


Model Representation Form for Local Plans

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

Medway Local Plan

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Alex"/>
Last Name	<input type="text"/>	<input type="text" value="Jones"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Planning Director"/>
Organisation (where relevant)	<input type="text" value="The Hoo Consortium"/>	<input type="text" value="Stantec UK Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="2 Kings Hill Avenue"/>
Line 2	<input type="text"/>	<input type="text" value="Kings Hill"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="ME19 2AQ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
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 Policy Policies Map

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 attached

(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 attached

(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 Hoo Peninsula, the soundness issues identified and modifications to remedy.

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.

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**Medway Local Plan 2041:
Proposed Submission Draft, Regulation 19
Representation on behalf of the Hoo Consortium**

On behalf of **Taylor Wimpey, Dean Lewis Estates, Redrow &
The Church Commissioners for England**

Document Control Sheet

Project Name: Hoo Consortium

Project Ref: 333102261

Report Title: Medway Local Plan 2041: Proposed Submission Draft, Regulation 19

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Date: 11 August 2025

	Name	Position	Date
Prepared by:	Alex Jones	Planning Director	29/07/2025
Reviewed by:	Huw Edwards	Planning Director	30/07/2025
Approved by:	Alex Jones	Planning Director	11/08/2025
For and on behalf of Stantec UK Limited			

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1 Introduction

- 1.1 These representations to Medway Council's Regulation 19 consultation on its emerging Local Plan are made on behalf of a consortium comprising of Taylor Wimpey, Dean Lewis Estates, Redrow and the Church Commissioners for England ('the Hoo Consortium').
- 1.2 The Hoo Consortium owns/ controls over 400ha of land on the Hoo Peninsula and has worked collaboratively with each other, Medway Council and stakeholders since 2017/18 on the coordinated delivery of new homes and infrastructure at Hoo St Werburgh, Chattenden and High Halstow (the three main villages on the Hoo Peninsula). This has included engagement in previous iterations of the emerging Local Plan including, the now withdrawn, Hoo Development Framework.
- 1.3 Medway's current Local Plan was adopted in 2003 and has been out of date for some time. It is imperative that a new Local Plan is put in place to re-establish a plan-led approach to development in Medway that delivers the homes and supporting infrastructure the community needs.
- 1.4 The Hoo Consortium's landholdings are of sufficient scale to accommodate the majority of social, economic, environmental and physical infrastructure to support transformational change at Hoo to create a more sustainable and self-sufficient community that will meet housing and other needs on the Peninsula during this Plan period and beyond.
- 1.5 The continued opportunity to engage in the preparation of Medway's Local Plan is welcome. As is the positive and proactive manner in which the Council has sought to bring forward this Local Plan. The Hoo Consortium supports the ambition of the emerging Local Plan, particularly in terms of growth on the Hoo Peninsula. The success of this Local Plan in delivering that growth requires a Local Plan with, inter alia, clear and focussed policies, a robust and proportionate evidence base and clear funding and delivery mechanisms for supporting infrastructure. This, in turn, will provide certainty and confidence to the Hoo Consortium and other developers on the Peninsula to enable them to bring forward the high-quality development the emerging Local Plan seeks to deliver in a timely manner to meet needs.
- 1.6 Whilst the emerging Local Plan goes some way to achieving the above, further consideration is required on a number of matters to ensure the Local Plan is found sound. These are expressed in these representations as '**technical**' **objections** alongside suggested modifications for the Council to consider prior to submission:
 - i. Development Needs & Spatial Strategy – strategic policies on development needs and spatial strategy required.

- ii. Housing Trajectory – a comprehensive housing trajectory is required that includes commitments, site allocations and windfall.
 - iii. Policy Format – clear and consistent format for policies required throughout that avoids explanatory text within the body of the policy, focuses on expectations/ requirements and includes numbering/ sub points for ease of referencing.
 - iv. Retail – avoid conflicting requirements across policies and disproportionate information requirements for applications. For example, requiring new local/ neighbourhood centres on the Hoo Peninsula in line with S22 and SA8 to support self-containment and reduce vehicle trips but only if it is demonstrated that no impacts will arise pursuant to T17 (which itself requires refinement to clarify that the floor area thresholds relate to net sales floorspace).
 - v. Streamlining Requirements – avoiding unnecessary additional layers of requirements that risk delaying delivery of development and add further burden to the information requirements.
 - vi. Infrastructure Delivery & Funding – providing details, costings and funding mechanisms for the items in the IDP currently marked as ‘TBC’; refinement of the current high-level costings for highway mitigation and inclusion of costs associated with the Bus Rapid Transit system to provide realistic estimate to improve developer confidence; further clarity needed on the phasing and coordination of infrastructure delivery.
 - vii. Viability – review of assumptions/ inputs and approach to ensure that this appropriately reflects costs so as to result in an accurate understanding of viability and assist in identifying ‘gaps’ in funding that cannot be met by developments without impacting the quantum of affordable homes that come forward.
 - viii. Monitor/ Manage – welcome the approach but query why small/ medium-scale allocations and those in urban centres are not included in vehicle trip credit when they will create trips/ impacts; further clarity needed on the mechanism for reallocation of trip credits.
 - ix. Site Allocations SA8 & SA9 – refinement required to the Concept Masterplan for Hoo St Werburgh and Chattenden (Figure 14) to reflect the extant applications and to Policies SA8 and SA9 to, inter alia, avoid unnecessary duplication, ensure deliverability and remove additional layers of approval.
- 1.7 It is the Hoo Consortium’s view that the emerging Local Plan is capable of being found sound with refinement and the preparation/ publication of further supporting information/ evidence.

- 1.8 The Hoo Consortium has worked with its consultants to prepare additional evidence and assessments to support the development aspirations for the Hoo Peninsula and inform the approach to transport/travel, infrastructure and understanding of viability. The Hoo Consortium will continue to engage with and support the Council in the next stage of work on the Local Plan.

2 Duty to Co-operate

- 2.1 The Localism Act 2011 places a legal duty on local planning authorities, county councils and prescribed public bodies 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. It is common at local plan examinations for legal compliance in respect of the Duty to Cooperate to be the initial matter considered. If not satisfied, it is challenging to rectify at examination. It is therefore imperative that local planning authorities clearly identify the strategic cross-boundary matters relevant to their area and document/evidence the work with relevant parties to positively plan to address these.
- 2.2 Medway has published a Duty to Cooperate Statement (June 2025) that summarises the strategic matters relevant to its area and which have formed the basis of engagement with neighbouring county and local authorities and other stakeholders. It is clear from this summary document that extensive engagement with relevant parties has taken place over a number of years and that this has covered a wide range of strategic matters. To fully evidence the engagement undertaken, and as commonly requested at local plan examinations, ***it is anticipated that Medway will collate and publish the records of discussions to demonstrate the proactive approach taken and its on-going nature.***
- 2.3 It is noted that Statements of Common Ground are under preparation with Duty to Cooperate parties. ***The Hoo Consortium would welcome the opportunity to agree a Statement of Common Ground in respect of its development interests on the Hoo Peninsula.***

3 Vision and Strategic Objectives

Vision (section 2.1; pages 16-18)

- 3.1 The emerging Local Plan 2041 sets out an aspirational 'Vision' for Medway where housing and economic needs are met in full through high quality, energy efficient development, supported by appropriately phased infrastructure and reducing reliance on private cars whilst strengthening distinctiveness and conserving and enhancing the natural and historic environment (pages 16-18). The Hoo Consortium supports the ambition of the Local Plan. Realising the Vision will require cooperation and collaboration across public, private and statutory bodies and significant funding/ investment.
- 3.2 ***Understanding the cost of achieving the Vision will be key in providing developer confidence to invest in Medway and facilitate the delivery of new homes and employment, improve quality of life and make this an attractive place to live and work.*** The emerging Local Plan is supported by a range of evidence base documents that have started to identify and cost infrastructure (Infrastructure Delivery Plan 2025; 'IDP'), considering this in the context of development viability (Viability Assessment 2025 Update; 'Viability Assessment'). It is understood that these are 'live' documents that will continue to evolve. The Hoo Consortium would welcome the opportunity to engage on future iterations of these documents and in particular the funding and delivery strategy for infrastructure which will be key to unlocking sustainable growth across the Plan period and beyond.

Strategic Objectives (section 2.2; pages 18-20)

- 3.3 A range of well-founded Strategic Objectives are set out in the emerging Local Plan (pages 18-20). The Hoo Consortium supports the Strategic Objectives, in particular:
- Supporting major shifts in modes of transport, improved choice for sustainable travel and reducing car dependency (1st, 2nd and 18th bullet points)
 - Providing homes to address local needs (5th bullet point)
 - Reducing health inequalities (6th bullet point)
 - Directing development to the most suitable locations (16th bullet point)
 - Meeting development needs in full with appropriately phased infrastructure (14th bullet point)
- 3.4 This is in addition to those seeking to conserve and enhance the natural and historic environment, respect local distinctiveness and promote climate change resilience.

- 3.5 The proposed growth on the Hoo Peninsula provides the opportunity to realise transformational change for the local community, delivering new homes, employment, retail and other services/ infrastructure alongside significant new publicly accessible open space and biodiversity enhancements, to improve self-containment, reduce the need to travel and provide increased patronage to facilitate improved public transport services as an alternative to the private car. This captures the Strategic Objectives of the emerging Local Plan in a location identified as a suitable location for growth.

4 Spatial Development Strategy

Chapter 3; pages 21-27

- 4.1 The Hoo Consortium supports 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 aspiration of the emerging Local Plan to meet development needs in full (see page 25) which the Hoo Consortium welcomes.
- 4.2 To provide clarity, ***the emerging Local Plan would benefit from a strategic policy that clearly articulates the full development needs that the Plan seeks to deliver and spatial distribution thereof.*** Paragraph 20 of the National Planning Policy Framework (2024: 'NPPF') requires local plans to include strategic policies that make provision for, inter alia, sufficient homes and non-residential forms of development. Whilst a spatial vision is articulated in the emerging Local Plan (pages 25-27), a strategic policy confirming development needs and where they will be met is currently absent. This is required to ensure compliance with the NPPF.
- 4.3 The number of homes the emerging Local Plan seeks to provide for is set out in the introduction to the Plan (paragraph 1.3.6) and introduction to the Housing chapter (paragraph 6.1.2) but does not feature in any of the specific policies. ***There would be merit in the first policy/ policies in the Plan being strategic policies relating to the scale of development the Plan seeks to deliver and spatial strategy.*** This should be a focussed and succinct policy identifying the full needs for homes, how many are expected to be delivered each year and the components of supply (including commitments, allocations and windfall). This would be either part of or alongside a policy on the spatial distribution of development, providing clarity on the expectations for growth in different locations, the basis for the site allocations (at Chapter 14) and introducing the development that will then need to comply with and deliver on the subsequent policies in the Plan.

Housing Trajectory

- 4.4 The phasing of infrastructure to support the growth the emerging Local Plan seeks to deliver will be fundamental in achieving the Vision and Strategic Objectives. Understanding the number of homes anticipated to come forward each year across the Plan period will be an integral element of such phased delivery. At present, the emerging Plan does not include a trajectory. There is site-specific housing trajectory appended to the Land Availability Assessment (June 2025; 'LAA'). ***A simplified trajectory including windfall allowance could helpfully be included in the Local Plan. This would assist the preparation of infrastructure delivery plans, including the Hoo-specific Infrastructure Delivery Plan and supporting funding strategies.***

Policies Map (page 27; separate maps)

- 4.5 In general, the Hoo Consortium has no comments on the draft Policies Maps for the Hoo Peninsula in terms of the type of information shown and its location/ extent.
- 4.6 This is with the exception of the ‘Safeguarded Land for Transport Scheme’ on Site HHH31. The extent of safeguarding relates specifically to a previous scheme explored to introduce passenger trains and associated infrastructure which was not taken forward. Whilst the Hoo Consortium would not wish to preclude the potential for this coming forward, although note that there is no certainty or evidence that this is feasible/ viable, the safeguarding is a very specific shape. It is the Hoo Consortium’s view that ***the Policies Map ought to be updated to remove the safeguarding from the Policies Map and indicate the potential location on the updated Concept Plan at Figure 14 as an aspiration rather than relate to a specific scheme that may be subject to change. Draft Policy DM17: Grain Branch requires modification to provide a clear release mechanism so as not to hinder/ slow delivery of Site HHH31.***

5 Natural Environment

Policy S1: Planning for Climate Change

- 5.1 The Hoo Consortium supports the intent of draft Policy S1 in seeking to direct development to sustainable locations, reducing the need to travel and improving active and low carbon transport choices as means of building resilience against climate change and improving air quality and environmental impacts.
- 5.2 The Hoo Consortium specifically supports the theme of reducing reliance on private cars that features throughout the emerging Local Plan. For the Hoo Peninsula, an improved bus service would provide an alternative to car usage to facilitate modal shift. The Bus Rapid Transit is noted as a key consideration in the Mode Share Strategy (Stage 3) (May 2025; see section 11.2). An extended bus service to the Hoo Peninsula is included as an item in the IDP (see page 101) but an estimated cost is not currently provided. ***The Hoo Consortium is keen to understand the likely cost of bus service improvements. Moreover, the strategy for delivery including any engagement with bus operators on the preferred delivery model, likely phasing of service improvements and other measures to enhance the attractiveness and patronage/ viability of buses to/ from Hoo.***

Policy S2: Conservation and Enhancement of the Natural Environment

- 5.3 This draft Policy introduces the Hoo Peninsula Strategic Environmental Programme ('the SEP'). A strategic approach to protecting designated sites is welcome as this offers improved outcomes and certainty to developers as to likely contributions. Whilst this element of the draft Policy is well-founded, the SEP has not yet been prepared and the scale of contributions from developments/ apportionment is as yet unknown. A cost estimate is included in the IDP for the SEP with some funding already identified but no funding mechanism. The overall cost is significant (£14m) and does not appear to have been considered in the Viability Appraisal. It is noted that further details of the SEP will inform an updated HRA prior to submission of the Local Plan (see Duty to Cooperate Statement paragraph 2.4.9). ***The Hoo Consortium would welcome the opportunity to review and comment further on the SEP once available.***
- 5.4 The Hoo Consortium supports biodiversity net gain of 10% in line with the statutory requirement.

Policy DM3: Air Quality

- 5.5 The Hoo Consortium does not make any specific comments on draft Policy DM3 but notes the relationship between air quality, improvements to sustainable transport modes (including improved bus services to the Hoo Peninsula) and reduced reliance on the private car. The Hoo Consortium's place-based vision for the Hoo Peninsula which seeks to facilitate a step-change in public transport will also have beneficial impacts on air quality.

6 Built Environment

6.1 No comments.

7 Housing

Policy T3: Affordable Housing

- 7.1 For the Hoo Peninsula strategic sites, 30% affordable housing is required. The draft Policy notes that this is in line with viability evidence in the form the Local Plan Viability Appraisal (2025). The Hoo Consortium is committed to the delivery of mixed and balanced communities with homes of different tenures that are accessible to a wide-ranging demographic and meet identified needs. A key consideration for development of the Hoo strategic sites will be balancing infrastructure delivery and contributions to support sustainable growth against development viability.
- 7.2 The Hoo Peninsula strategic sites currently have the highest s106 assumptions in the Viability Appraisal (2025) at c. £240m, equivalent to c. £35k per plot (see Table 8.11). The s106 assumptions are based on cost estimates from the IDP, some of which are high-level and presented as a wide range. There are also a number of listed items in the IDP that have not yet been costed. ***To support developer confidence/ certainty to bring forward development in line with the Local Plan and in a timely manner, the likely infrastructure costs would benefit from refinement. This will be important in ensuring that s106 contributions remain at a viable level and do not result in reduced levels of affordable housing, particularly as the Viability Appraisal shows that 30% is the maximum/ upper limit of affordable housing achievable with the current levels of s106 contributions on the Hoo Peninsula (see Appendix 14).***

Policy T9: Self-Build and Custom Housing

- 7.3 The Hoo Consortium supports a range of housing choices coming forward including self and custom build. Whilst the inclusion of a minimum percentage requirement for self/ custom build plots for developments in excess of 100 homes provides clarity/ certainty as to expectations, the need relates to the Register and there is a risk that this number of plots will significantly exceed demand over the Plan period. ***There would be merit in embedding flexibility in the draft Policy in the event that demand falls. For example, removing 'no less' and requiring a fixed 4% of plots for self/ custom build 'unless demand on the Self/ Custom Build Register falls below this level in which case a lesser percentage will be sought'.***

- 7.4 The 4th bullet point of the draft Policy aims for self/ custom build plots to be provided and serviced at the earliest stage possible. The justification for this is unclear. The 10th bullet points requires self/ custom build plots to be marketed for a period of at least 12 months. Providing these plots in an early phase risks land being left vacant for the marketing period and construction commencing when the market/ affordable homes within that phase have been completed and occupied, creating potential logistical and health and safety concerns. Moreover, the optimum location for the self/ custom build homes may be in a different part/ later phase. ***The draft Policy should be amended to require the phase within which the self/ custom build are to be located to be agreed but should not pre-determine that the optimum point of delivery is in an early phase.***
- 7.5 The approach of the final bullet point of draft Policy T9 is not justified. This would require unsold self/ custom build plots to be offered to the local authority for the provision of affordable housing before they would revert to the developer to build out as market housing or sell unrestricted. As set out above, 30% affordable housing for the Hoo Peninsula strategic sites is the upper limit of what is viable with the current level of assumed s106 contributions. The current approach of draft Policy T9 could have the effect of increasing the affordable housing requirement to 34%, a level at which the Viability Appraisal shows as being marginal and thus not appropriate. ***The requirement to offer unsold self/ custom build plots to the local authority ought to be removed.*** The alternative would be for the quantum of self/ custom build to be discounted from the affordable housing requirement with the relevant section of draft Policy T9 amended accordingly.

8 Economic Development

- 8.1 The Hoo Consortium supports the identification of the Hoo Peninsula as a location for new employment development and the allocation of land to facilitate this (see draft policy SA14). The Hoo Consortium queries the justification for phasing brownfield employment sites before greenfield. Flexibility in the draft policies is required to ensure this key employment location has the best prospects of success and that the aspiration to meet all employment needs over the Plan period is realised. It is widely acknowledged that brownfield sites can be challenging to bring forward and take longer than planned to deliver. Draft ***Policies S12 and SA14 should be amended to allow greenfield sites to come forward in parallel to brownfield.*** This would provide resilience in the approach to employment delivery and the opportunity to deliver employment floorspace at the right time to meet needs.

9 Retail and Town Centres

- 9.1 The emerging Local Plan includes a range of draft policies related to protecting and strengthening existing retail centres, alongside positively planning to expand the retail offer, including in strategic development locations such as the Hoo Peninsula. The Hoo Consortium is aligned with the principles of these policies but considers that ***refinement is required to remove ambiguity/ inconsistency so that it is clear to developers and decision-makers how proposals for retail will be considered (in line with NPPF paragraph 16(d)). Moreover, that consistent terminology is used throughout Chapter 8.***
- 9.2 Several policies make provision for new retail (for example, draft Policy S22: Hoo Peninsula and site allocation Policies SA8 and SA9) to, inter alia, improve self-containment and reduce the need to travel. However, there appears to be a conflict between the policies seeking to protect and assess impacts on existing retail and those for new/ expanded provision. For example:

9.2.1 Policy S16: Hierarchy of Centres

- a) Existing 'Local/ Rural Centres' are listed in draft Policy DM12. For ease of navigating the Local Plan, ***there would be merit in cross referring to this at Point 1c.***
- b) Are the new centres at Hoo/ Chattenden and High Halstow 'Local/ Rural Centres' and so fall within the hierarchy or 'Shopping Parades/ Neighbourhood Centres' which draft Policy T18 states fall outside of the hierarchy (Point 2)? ***It would be helpful to include the distinction between a Local/ Rural Centre and Shopping Parade/ Neighbourhood Centre early in the supporting text to this Chapter.***
- c) Point 3 talks about 'new centres' generally without defining whether this is all retail centres or just those within the hierarchy. Small retail centres that provide local shopping facilities ought not need to provide impact assessments. ***There would be merit in Point 3 cross-referring to the impact assessment thresholds in draft Policy T17.***

9.2.2 Policy T17: Impact Assessments

- a) Draft Policies S22, SA8 and SA9 require new retail provision on the Hoo Peninsula, but the planning applications for such would require impact assessments pursuant to draft Policy T17 if the floor area thresholds are exceeded. Given the wider benefits of localised retail provision at Hoo/ Chattenden and High Halstow (including community cohesion, reduced trips etc), it is the Hoo Consortium's view that ***the strategic developments ought to be exempt from the provisions of draft Policy T17.***

- b) A floor area measure for the impact assessment thresholds has not been included. This risks ambiguity as to which developments would fall within the remit of draft Policy T17. ***Net sales floorspace would be an appropriate measure to include in an update to draft Policy T17*** as this relates to trading floorspace from which impacts may arise.
- c) The impact assessment thresholds are very low in comparison to the NPPF (paragraph 94) default threshold of 2,500 sq.m gross. ***The Retail & Town Centres Study (2025) does not include Hoo in its consideration of impact assessment thresholds thus further evidencing that new retail provision on the Hoo Peninsula should be exempt from draft Policy T17.***

9.2.3 Policy S22: Hoo Peninsula

- a) ***Clarity is needed as to what is meant by a 'main centre' for the Hoo Peninsula and where this sits in the town centre hierarchy as this is not a term/ name that features in the hierarchy at Point 1 of draft Policy S16.***
- b) Draft Policy DM12: Local and Rural Centres includes new provision at Hoo, Chattenden and High Halstow within its remit but draft Policy S22 describes the other two retail centres on the Hoo Peninsula as 'neighbourhood centres'. Hoo, Chattenden and High Halstow new centres are also included in draft Policy T18: Shopping Parades and Neighbourhood Centres. ***Clarity is needed on which types of centres these are to be so that it is clear which policy they need to be considered against.***
- c) ***Shopping Parades/ Neighbourhood Centres are noted in draft Policy T18 as having a 'very localised' role/ function and not competing with defined centres in the hierarchy. These ought not then require impact assessments pursuant to draft Policy T17.***

10 Transport

- 10.1 The Hoo Consortium has instructed Pell Frischmann to provide transport planning and highway engineering advice in respect of its interests on the Hoo Peninsula. Pell Frischmann has reviewed the transport, travel and highways infrastructure aspects of the emerging Local Plan and evidence base and prepared separate representations on these specific matters. These are included at Appendix A of this report and should be read in full as they comprehensively consider the merit of the approach taken and set out recommended areas for further work/ refinement.
- 10.2 The following is a high-level summary:
- a) Support for the 2041 Vision and focus on public transport and active travel as the basis for sustainable growth; this aligns with the Hoo Consortium's place-based vision for the Hoo Peninsula.
 - b) Particular support for the Bus Rapid Transit as a means of providing a 'step-change' in bus provision between the Hoo Peninsula and interchange at Strood; welcome opportunity to further engage to ensure that this is deliverable and successful.
 - c) Vehicle trip credit approach of draft Policy DM15 welcome but vehicle trip budget not yet defined; further work required on the detail and to incorporate this into an Area-Wide Travel Plan that establishes a practical methodology for its implementation/ management moving forward. Query why small/ medium-scale allocations and those in urban centres are not included in vehicle trip credit when they will create trips/ impacts that will need to be mitigated.
 - d) Even with the vision-led approach the Council's Strategic Transport Assessment identifies some existing and forecast highway capacity constraints to be addressed. The Council has identified proposed mitigation schemes, some exceptionally large; these ought to be supported by optioneering and deliverability strategies that include funding at least part through alternative means to s106 as new developments can only be asked to contribute to the mitigation of 'new' impacts (i.e. not the known existing capacity issues).
 - e) The Bus Rapid Transit is not currently included in the package of highway improvements or costed in the IDP; this is a priority item to facilitate the 'vision' that the Hoo Consortium would welcome further detail on. Initial discussions between Pell Frischmann and the local bus operator indicate no substantive constraints to expansion as demand increases.

- f) Further work on 'cost apportionment' required that takes account of viability; this is understood to form part of a 'stage 2' that the Hoo Consortium would welcome engagement on.
- g) It is noted that the Lower Thames Crossing upgrades will remediate some but not all of the existing issues at Junction 1 of the M2; the Hoo Consortium would welcome confirmation as to the current position in respect of M2 J1.
- 10.3 In addition to the separate transport/ highway representations, Pell Frischmann has prepared:
- Draft Area-Wide Travel Plan
 - Sustainable Transport Strategy
- 10.4 The purpose of the Area-Wide Travel Plan ('AWTP') is to provide a strategic vision, objectives and baseline targets for reducing car and promoting sustainable travel across the Hoo Peninsula. Future Site-Specific Travel Plans would then be developed in line with the AWTP to facilitate a cohesive and coordinated approach to sustainable transport that avoids piecemeal interventions.
- 10.5 The AWTP will help to facilitate the Sustainable Transport Strategy ('STS'). The STS sets out the sustainable, place-based vision for the Hoo Peninsula which puts people at the forefront of development and sets out an aspirational but deliverable strategy for achieving a step-change in sustainable transport options for existing and new residents.

11 Health, Communities and Infrastructure

Policy T29: Community and Cultural Facilities

- 11.1 Draft Policy T29: Community and Cultural Facilities states that *'large scale residential developments will be required to provide community facilities to meet the needs of new residents'* (3rd paragraph) with all developments over 10 homes contributing to upgrading community facilities (5th paragraph). ***To avoid doubling up on requirements, it should be confirmed that this will either be provision of new community facilities OR contributions to upgrading existing, but not both.***
- 11.2 The IDP includes several community/ cultural items for the Hoo Peninsula including an 'Integrated Community Hub' and 'Hoo Visitor Centre'. Neither of these currently have costs estimates. ***The Hoo Consortium welcomes the provision of additional community infrastructure for the Peninsula and will comment further on this once further information and costings are available.***

Policy S24: Infrastructure Delivery

- 11.3 A key focus of the emerging Local Plan is on the delivery of infrastructure with paragraph 10.5.1 stating that it is a 'vital component' of the Plan. Re-establishing a plan-led approach to development in Medway will be fundamental in achieving its ambitions for infrastructure delivery aligned with growth. This places particular emphasis on infrastructure delivery and improvements in locations such as the Hoo Peninsula where infrastructure delivery has lagged behind other areas.
- 11.4 The Hoo Consortium is committed to investing in the Hoo Peninsula. To retain and attract committed developers to invest in Medway, the expectations on developments to contribute to and directly deliver infrastructure must be justified, proportionate and underpinned by robust evidence and assessment to ensure CIL regulation compliance. Those bringing forward new developments cannot be expected to 'fix' existing issues with/ shortfalls in infrastructure. Moreover, the scale of contributions sought through s106 must not undermine development viability (see Appendix B). Where additional ('gap') funding is required, this should be clearly set out and funding sources/ mechanisms identified. Also of relevance is the mechanism for funding phased delivery where the required level of s106 contributions may not be available at the point needed but will be available at a future date.

- 11.5 The IDP provides a starting point for understanding the infrastructure needs, funding and delivery strategy for Medway. For the Hoo Peninsula, it is understood that a separate Hoo Infrastructure Delivery Plan will be developed. This will seek to refine infrastructure requirements specific to the Hoo Peninsula and align these with planned housing growth. ***It will be important to ensure that any Hoo-specific IDP is clearly distinguished from the Medway-wide IDP to ensure ‘double counting’ of infrastructure items/ costs does not occur. The Council may wish to consider whether a separate IDP for the Hoo Peninsula is necessary to streamline the number of supporting documents/ plans developers and officers will need to consider.***
- 11.6 The IDP is noted as a ‘live’ document that will continue to evolve. ***It is assumed that this will be ‘live’ in the context of the Regulation 19 consultation but will be ‘fixed’ in advance of the examination to provide certainty to developers? The inclusion of all cost estimates will assist developers in understanding the likely level of s106 contributions and the Hoo Consortium would welcome the further opportunity to comment on the IDP once updates are available.***
- 11.7 A number of the cost estimates in the IDP are very high-level and/ or provide for a wide range. It is assumed that the approach has been to account for a ‘worst-case’ in respect of potential infrastructure costs. ***To provide developers with confidence to bring development forward, there would be merit in updating these estimates to provide more accurate/ refined costings.***
- 11.8 The Hoo Consortium has instructed cost consultants to review the estimates for the key highway mitigation schemes in the IDP based on working knowledge of works of the type indicated as necessary. In respect of highway works alone, this concludes that the cost estimates within the Local Plan evidence base exceed realistic costings by c. £65m (see Appendix C). This would have a significant (positive) impact on development viability for the Hoo Peninsula strategic sites based on the Local Plan Viability Assessment. This would provide an additional ‘buffer’ to development viability from, inter alia, fluctuations in construction costs and market conditions, and provide developers with greater confidence to bring forward development of the strategic sites to the high-quality the emerging Local Plan aspires to and in a timely manner.
- 11.9 Benchmark analysis has also been undertaken in respect of the additional education facilities identified for the Hoo Peninsula (see Appendix C). This compares the IDP cost estimates to BCIS (‘Building Cost Information Service’) and NSB (‘National Schools Benchmarking’) figures. This concludes that the IDP estimates exceed realistic likely costs for the majority of the identified education projects. Whilst there is a marginal difference for some (i.e. a new 2FE primary school), single form primary expansion in the benchmark analysis ranges from c. £5m to £6m against an IDP estimate of £10m. A new 3FE primary school and new 6FE secondary school also come in at several million pounds less than the IDP estimates. ***The Hoo Consortium would encourage the Council to review its IDP cost estimates in this context and consider a benchmarking approach moving forward.***

- 11.10 The Council will need to consider, as a next stage of works, the funding and delivery strategy for relevant infrastructure. Proportionate financial contributions from the Hoo Peninsula strategic sites will come forward at different times based on the trajectory of housing delivery. In listening to the local community, it is understood that the Council will be exploring ways in which to facilitate early delivery of some infrastructure items. This could include options for front-funding with costs recovered subsequently by s106 contributions. The Hoo Consortium would be pleased to engage in further discussions with the Council on options in this regard.

12 Minerals Supply

12.1 No comments.

13 Waste Management

13.1 No comments.

14 Energy

- 14.1 Section 13.3 of the emerging Local Plan provides context to the subsequent draft Policy T41: Heat Networks. This notes that Medway has received funding and commissioned initial feasibility studies to explore the potential for heat networks. However, these studies have not been published as part of the Regulation 19 evidence base. Supporting paragraph 13.3.7 notes that *'heat networks are often complex to deliver; they generally have initial high capital costs and long investment payback times'*. The potential role of 'anchor loads' is noted but in the absence of further evidence as to the feasibility of this, particularly on the Hoo Peninsula which does not benefit from notable 'public buildings' from which anchor loads can be drawn, it is difficult to comment on the soundness of the draft Policy. The Hoo Consortium is committed to the delivery of sustainable and energy efficient development. However, ***draft Policy T41 appears premature. Once further work has been undertaken, and published for review, the Hoo Consortium will provide further comment.***

15 Site Allocations

- 15.1 The Hoo Consortium supports the inclusion of site allocation policies for Hoo St Werburgh and Chattenden and High Halstow. The approach to collating individual sites on a settlement/ grouped settlement basis is welcomed and assists in providing a comprehensive set of policy considerations to be addressed at the appropriate scale.
- 15.2 Growth on the Hoo Peninsula will take place over the Plan period and beyond. The Hoo Consortium supports the provision of a policy framework to guide development and masterplanning. However, this needs to balance clarity of vision and requirements against the need for flexibility to allow it to evolve/ respond to, inter alia, changes in circumstance including the needs of the community. It should also not seek to duplicate policy provisions from elsewhere in the emerging Local Plan nor prescribe specific solutions that are undeliverable and/ or fetter the ability of a preferable approach being brought forward on the basis of detailed assessment/ evidence at the application stage. That said, clear links to other policies in the Plan and the consistent use of terminology assists in understanding how the wider Plan policies apply to the site allocations.
- 15.3 The site allocations should also avoid introducing additional layers of approvals between the Local Plan and applications. This places further burden on developments and risks delaying the delivery of much needed new homes and facilities for the Peninsula.
- 15.4 ***To achieve a sound policy basis for bringing forward development at Hoo St Werburgh/ Chattenden and High Halstow, the Hoo Consortium considers that modifications are required to Policies SA8: Hoo St Werburgh and Chattenden and SA9: High Halstow.*** These modifications are provided as tracked changes to the site allocation policies at Appendix E of these representations. An updated Composite Masterplan showing the Hoo Consortium sites/ proposals and others is enclosed at Appendix D to inform updates the Hoo St Werburgh/ Chattenden. Comments have been added to explain the Hoo Consortium's position and justification for the requested changes. These are summarised at a high level below (with reference to the relevant numbered objective or criteria of the respective site allocation policies):

Policy SA8: Hoo St Werburgh and Chattenden

- 15.5 Objective 1: Number of Homes – the Church Commissioners for England ('the Commissioners') own a substantial area of land to the east of Hoo St Werburgh identified as Sites HHH22 and HHH31 in the draft Local Plan. The Commissioners' housing trajectory provides for completion of c. 1,880 homes within the current Plan period to 2041 whereas draft Policy SA8 assumes only 1,700 homes from this site. This would increase the total number of homes provided for through Policy SA8 from c. 4,700 to c.

- 4,900 requiring updates to Criteria 1 and the Site-Specific Information schedule for Sites HHH22 and HHH31.
- 15.6 The Site-Specific Information schedule should also be updated to clarify that all c. 1,880 homes from Sites HHH22 and HHH31 will come forward in Years 1-15 of the Local Plan. It is currently stated that delivery will extend to 15 years plus. However, the homes beyond 2041 will be in addition to the number stated in the schedule to a total of c. 3,200 homes from these sites (i.e. 1,880 homes within the current Plan period and 1,320 in Years 15 plus). It is accepted that identifying total supply from these sites may assist in terms of, inter alia, infrastructure requirements/ funding/ delivery, in which case this could be included as footnote to Policy SA8.
- 15.7 The HBF comments in respect of the Plan period and housing requirement have been noted by the Hoo Consortium. As the delivery of homes at Hoo St Werburgh will extend beyond the current Plan period, this would assist in the event that the Council needs to identify sources of additional homes. For example, Sites HHH22 and HHH31 are anticipated to deliver around 180 homes a year beyond 2041.
- 15.8 Criteria 3: Maintaining Separation – the emerging Local Plan seeks to avoid coalescence of Hoo St Werburgh and Chattenden to maintain these as two distinct settlements. The Hoo Consortium supports the intent but considers draft Policy SA8 to currently be too prescriptive as to the means by which separation will be maintained. Moreover, the specific approach advocated is not deliverable owing to existing highways infrastructure.
- 15.9 Hoo St Werburgh and Chattenden are currently physically separated by the A228 which, at this point, is a four-lane dual carriageway with central reservation and additional carriageway buffer either side to create a wide highway corridor that has a notably severing effect between the two settlements. Main Road also contributes to physical separation between Hoo St Werburgh and Chattenden.
- 15.10 Criteria 3 provides for a ‘strategic landscape corridor’ between the settlements with the Figure 14 Concept Masterplan providing a green arrow in this location identified on the key as a ‘strategic green corridor’. Delivery of a continuous green/ landscaped corridor as currently shown is not possible given the presence of the A228. There does not appear to be any technical assessment or evidence that supports this as the optimum means of achieving the anti-coalescence objective. The draft Policy and the Concept Masterplan should be modified to set out the requirement to avoid physical and visual coalescence but not prescribe a specific and undeliverable means of achieving this.
- 15.11 Criteria 5 and 11, Subsequent Design Principles and Concept Masterplan – several planning applications have been submitted in respect of draft site allocations at Hoo St Werburgh. These are underpinned by technical assessment that provide for optimal solutions and demonstrate deliverability. Further initial works have been undertaken by those sites not yet at the application stage. In addition to the updates noted above in respect of maintaining separation between Hoo St Werburgh and

Chattenden, the Figure 14 Concept Masterplan requires modification to reflect the technically robust and deliverable development proposals submitted. To assist, an updated Composite Masterplan has been prepared by the Hoo Consortium and is enclosed at Appendix D.

- 15.12 Including a robust Concept Masterplan, reflective of deliverable developments and supported by the Hoo Consortium, would allow Criteria 5 and 11 to be modified to seek broad accordance with the Concept Masterplan as the framework to guide development at Hoo St Werburgh and Chattenden. This would avoid the need for a further masterplan to come forward ('Subsequent Design Principles'), thus removing an unnecessary 'layer' of works/ approvals that would slow the delivery of much needed homes, employment and infrastructure in this location.
- 15.13 The further masterplan is variously called a 'strategic masterplan', a 'strategic masterplan development framework', a 'strategic development framework and masterplan' and a 'Hoo Planning Framework, including a masterplan'. To confirm, the above comments refer to all variations on the area-wide masterplan, none of which are considered necessary or proportionate in this context.
- 15.14 In relation to Criteria 18, a 'strategic masterplan development framework' is not required in respect of historic landscapes or other heritage considerations. The site allocation itself is sufficient to establish the expectations in respect of heritage.
- 15.15 Criteria 6, 12, 14 and 15: Hoo IDP and Highway/ Transport Schemes – these criteria refer to an Infrastructure Delivery Plan for the Hoo Peninsula. Both Criteria 6 and 12 include different names for this document. A single, consistent name would be helpful. Criteria 12 then goes on to refer to the 'latest IDP'. Clarity is needed on the intention in this regard. If a Hoo-specific IDP is to be prepared, this will need to be clearly distinct from the wider Medway IDP to avoid 'double counting'.
- 15.16 This will be particularly important if highway mitigation schemes are to be included (which the Hoo Consortium considers should be for completeness and transparency on the full suite of infrastructure items) as these are not all only required to facilitate growth on the Hoo Peninsula.
- 15.17 The inclusion of Criteria 14 on the Bus Rapid Transit is welcome given the importance to the place-based vision for the Hoo Peninsula (see transport representations and supporting reports at Appendix A). It is recommended that this Criteria be modified to refer to the type of service provision (i.e. BRT) rather than a specific bus operator and that BRT is used consistently throughout all subsequent relevant site allocation policies (see below)
- 15.18 Criteria 20: Heat Networks – as set out in the Hoo Consortium's comments on draft Policy T41, no supporting evidence has been published on the feasibility and/ or viability of delivering a heat network on the Hoo Peninsula so it is not currently possible to comment on the technical basis/ evidence underpinning draft Policy T41. Criteria 20 seeks to place the burden of exploring the feasibility/ viability

of a heat network on the Hoo Peninsula on developers. This is not reasonable or justified given the absence of evidence. Moreover, draft Policy T41 sets out a hierarchy for developers to consider thus further duplication of requirements is not required in the site allocation Policy to ensure it aligns with the NPPF (paragraph 16(f)).

Policy SA9: High Halstow

- 15.19 Supporting Paragraph 14.10.2 and Criteria 6: Neighbourhood Plan and Local Housing Needs – reference is made in supporting paragraph 14.10.2 to the vision and aims of the High Halstow Neighbourhood Plan and a survey of housing needs. The emerging High Halstow Neighbourhood Plan was withdrawn from examination in 2022 and carries no weight in decision-making. It also does not appear that the housing needs survey is publicly available on either Medway or the Parish Council's websites. It is therefore not appropriate for the emerging Local Plan to include such specific details of a neighbourhood plan that does not exist and evidence base that is not in the public domain.
- 15.20 If/ when High Halstow brings forward a new neighbourhood plan and this proceeds to adoption, it will form part of the development plan for this area thus it is not necessary for the emerging Local Plan to include such details at this time.
- 15.21 Criteria 2 and Subsequent Design Principles: Combined Masterplan – the Hoo Consortium supports the intent of Criteria 2 for development proposals at high Halstow to come forward in a comprehensive manner but to achieve this does not require a single or combined masterplan. There are only two controlling parties who are part of the Hoo Consortium and so working collaboratively already. Moreover, the updated Composite Masterplan (Appendix D) shows how the two Sites work together to deliver a cohesive residential extension to High Halstow. Given this context, it is sufficient for each application to demonstrate how comprehensiveness with the other is achieved through individual site masterplans as already submitted for Site HHH26 (LPA reference MC/23/0855).
- 15.22 Unlike the majority of other areas covered by site allocation policies, the emerging Local Plan does not include a Concept Masterplan for High Halstow. The Hoo Consortium would support the inclusion of a Concept masterplan for Policy SA9 based on the updated Composite Masterplan (Appendix D).
- 15.23 Criteria 3: Village Centre – through masterplanning of the site allocations, connectivity to the existing Village Centre can be provided. It does not follow that viability of the existing centre will be improved as this depends on a range of factors outside of the control of the High Halstow developers thus this ought not be a requirement in the site allocation Policy.

- 15.24 Criteria 4: Landscape/ Separation – as with the approach taken in draft Policy SA8 for Hoo St Werburgh and Chattenden, draft Policy SA9 seeks to prescribe the means by which coalescence is to be mitigated. High Halstow is a significant distance from any neighbouring settlements and thus the risk of coalescence is non-existent. Flexibility is required to allow the optimum landscape enhancement strategies to be brought forward.
- 15.25 Criteria 11 and 12: Highway/ Transport Schemes – as above for draft Policy SA8, Criteria 11 should be amended to refer to the type of service rather than the service operator. Criteria 12 should be modified to make clear that developments will only be required to make proportionate contributions to the junction works listed and only then if impacts beyond the existing capacity constraints are identified to ensure CIL Regulation compliance.

Policies SA11: Rural Settlements, SA12: Other Sites & SA14: Employment Sites

- 15.26 Many of the sites covered by these draft site allocation policies would benefit from Bus Rapid Transport provision to/ from the Hoo Peninsula. As such, ***these policies should be modified to have the same expectation to facilitate/ support Bus Rapid Transit and funding of sustainable travel measures prioritised over general highway infrastructure*** to support the place-based vision for the Hoo Peninsula as a whole.

16 General Comments

- 16.1 The Hoo Consortium makes the following general comments on the format and detail contained within the draft Policies. Reference is made to specific draft policies to amplify the points made but these apply to the vast majority of policies within the draft Local Plan and the Hoo Consortium requests that the whole Local Plan is reviewed in this context.
- 16.2 The NPPF (paragraph 16(d)) requires Local Plans to:
- ‘(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’
- 16.3 The Planning Practice Guidance (‘PPG’) (paragraph: 002 Reference ID: 61-002-20190315) further provides that local plans should be ‘*focussed, concise and accessible*’.
- 16.4 A notable number of the draft Policies in Medway’s emerging Local Plan extend over two pages of text with no numbering/ sub-points. These policies contain a significant amount of explanatory text and justification for the policy approach. This is unnecessary and creates ambiguity as to the actual policy requirements/ expectations. ***Explanatory text and policy justification ought to be relocated to the supporting/ explanatory paragraphs.*** The policies themselves would then be more concise and focussed on the matters that developers will need to consider in bringing forward development proposals in Medway and upon which the decision-maker will make their assessment/ decision in line with the NPPF and PPG.
- 16.5 ***The Policies would also benefit from being broken in to clearly identified points/ sub-points that make clear the different elements/ expectations of the Policies.*** This will also allow developers and decision-makers to identify which parts of the Policies are relevant and how/ where they have been addressed by development proposals.
- 16.6 An example is draft Policy S2: Conservation and Enhancement of the Natural Environment. The policy wording is almost 900 words over more than two pages. This is the key Policy for conserving and enhancing the natural environment, but the current length of policy and approach risks these important messages therein being lost. The first two paragraphs are explanatory and can be omitted and moved to the supporting text. The third paragraph and others explaining what the Council is seeking to achieve through the Policy can also be taken out with the Policy then focussing on the expectations of developers/ developments. Each separate element/ requirement of the amended Policy should then have a number to make clear the different matters to consider/ address and allow for this to be easily referenced by developers and decision-makers.

Appendix A

Project	Medway Local Plan Regulation 19
Document Title or Subject	Hoo Consortium Transport Representations
Document Reference	109345-PEF-XX-XX-TN-TR-004002
Revision Reference	P02
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1 Introduction

1.1 Background

- 1.1.1 Pell Frischmann (PF) has been appointed by the Hoo Consortium (the Consortium) to provide transport planning and highways engineering advice, and to produce these Representations summarising the Consortium’s transport representations with regard to the Medway Local Plan (LP) which is currently at Regulation 19 consultation stage.
- 1.1.2 The Consortium is a group of developers and landowners with significant landholdings on the Hoo Peninsula (the Peninsula) in Medway and/or the capability to bring forward significant levels of development. It comprises Dean Lewis Estates, the Church Commissioners for England, Redrow, and Taylor Wimpey.
- 1.1.3 The Consortium 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. To that end, the Consortium is leading on a programme of sustainable transport strategy planning, and area-wide travel planning, with the expectation that this will feed into the Local Plan going forward.

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 TN sets out the representations of the Hoo Consortium with regard to the transport aspects of the LP, including:
 - Their collective view on the extent to which the LP is suitable to achieve its transport aims;
 - How the LP relates to the proposals on the Hoo Peninsula; and
 - A high-level review of the LP transport proposals.
- 1.2.3 The Consortium have reviewed the available evidence base and the updated Regulation 19 LP main document. These representations focus on the following:
 - 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)

2 Regulation 19 Transport Representations

2.1 Local Plan (Regulation 19 Version)

Vision for Medway

2.1.1 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. [...]"

2.1.2 The Consortium 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.

2.1.3 The Consortium notes that a lack of access to public transport is an issue cited by a 'vast majority' of existing residents in the Medway villages¹ 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 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.

2.1.4 The Consortium therefore welcomes the 2041 Vision for Medway which underpins and informs the emerging Medway Local Plan.

Policy S20: Strood District Centre

2.1.5 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."

2.1.6 The Consortium 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.

2.1.7 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 Consortium would welcome plans for improvements at Strood to come forward as early as possible in the Local Plan period.

2.1.8 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 Consortium strongly welcomes the inclusion of this item in the Policy

¹ Medway Village Infrastructure Audit (June 2025)

(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.

- 2.1.9 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 Consortium 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.
- 2.1.10 It is also noted that the potential routing indicated on a number of diagrams in the Local Plan Evidence Base for the BRT cross some proposed land allocations of the Consortium members. The Consortium would welcome further engagement with Medway on the proposed routing, with a view to ensuring that the potential routing(s) are properly captured at the earliest stage of the site masterplanning process.

Policy S22: Hoo Peninsula

- 2.1.11 The Consortium 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."

- 2.1.12 The Consortium 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.
- 2.1.13 The Consortium has a demonstrated record of cooperation with Medway Council and expects to continue to work closely with the Council (and others) to identify the issues at hand, and to develop a credible approach to dealing with the transport constraints of the Peninsula.

Section 9: Transport: Place-based Vision

- 2.1.14 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]

- 2.1.15 As noted above, the Consortium 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).

Section 9: Transport: Vehicle Trip Generation/Budget

- 2.1.16 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.”

- 2.1.17 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.

- 2.1.18 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 Consortium 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.”

- 2.1.19 The Consortium 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 Consortium 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.
- 2.1.20 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.
- 2.1.21 The Consortium 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.

- 2.1.22 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

- 2.1.23 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.”

- 2.1.24 The Consortium notes and welcomes the commitment to an Area-Wide Travel Plan. Informed by the Sustainable Transport Strategy, the Consortium has led in the preparation of the Area-Wide Travel Plan, which can achieve the aspirations of the 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.
- 2.1.25 The Consortium’s Area-Wide Travel Plan is currently in preparation but a draft version has been included alongside these Representations at Appendix A. The Consortium 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

- 2.1.26 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.”

- 2.1.27 The Consortium 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 Fasttrack 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).
- 2.1.28 The Consortium has engaged with the current major local bus operator (Arriva) to discuss the emerging proposals on the Peninsula. Feedback has been positive with the operators keen to expand commercial services as demand increases. The Operator notes 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

- 2.1.29 The Consortium 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.

2.2 Strategic Transport Assessment

- 2.2.1 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.
- 2.2.2 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 shift², analogous to but less ambitious than the Sustainable Transport Strategy being promoted by the 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.
- 2.2.3 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 to the south at Four Elms Roundabout, Main Road Roundabout and Sans Pareil Roundabout, a series of major schemes have been presented.
- 2.2.4 Notwithstanding the limited optioneering presented in some of the appendices to the STA, the Consortium 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 million³. 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 which developers are likely to be required to fund, which the initial presented evidence indicates may only just achieve the aims in traffic operation terms.
- 2.2.5 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.
- 2.2.6 Given that the burden of funding a significant proportion of these works is likely to fall to the Consortium, 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.
- 2.2.7 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.
- 2.2.8 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 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 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.

³ Mid-point estimate (IDP Table 14-1)

- 2.2.9 Overall, whilst the Consortium 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 Consortium and Medway's Vision.

2.3 Infrastructure Delivery Plan

- 2.3.1 The Consortium welcomes the commitment to a range of transport (and non-transport) infrastructure elements through the IDP.
- 2.3.2 The Consortium 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.
- 2.3.3 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.
- 2.3.4 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

- 2.3.5 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.
- 2.3.6 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.

- 2.3.7 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.
- 2.3.8 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.
- 2.3.9 More generally, the above costs also exclude BRT infrastructure, which is likely to have a substantive cost 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.
- 2.3.10 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]
- 2.3.11 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.
- 2.3.12 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 Consortium (and others) have achieved significant trip rate reductions such that 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.
- 2.3.13 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.
- 2.3.14 The Consortium is committed to working closely with Medway Council and considers that there is more to do on this matter.

2.4 Proportionality Assessment (July 2025; r2)

- 2.4.1 The Consortium 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.
- 2.4.2 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.

2.4.3 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.

2.4.4 The Proportionality Assessments notes that a potential "Method 2" shall be further developed which (among other considerations) will also consider viability. The Consortium welcomes this commitment and looks forward to working with Medway on this item.

2.5 M2 Motorway

2.5.1 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

2.5.2 Given that the M2 is the statutory responsibility of National Highways (NH), the Consortium would welcome confirmation of NH's current position.

2.5.3 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.

2.5.4 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.

2.5.5 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 Consortium 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.

2.5.6 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 Hoo Consortium (the Consortium) to provide transport planning and highways engineering advice, and to produce these Representations summarising the Consortium's transport representations with regard to the Medway Local Plan (LP) which is currently at Regulation 19 consultation stage.

- 3.1.2 The Consortium has been working in collaboration with Medway 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. To that end, the Consortium is leading on a programme of sustainable transport strategy planning, and area-wide travel planning, with the expectation that this will feed into the Local Plan going forward.
- 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 Consortium with regard to the transport aspects of the LP.

3.2 Summary

- 3.2.1 The Consortium 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 Consortium looks forward to working with Medway to further develop these proposals to ensure they are both deliverable and successful.
- 3.2.2 The Consortium's demonstrated record of taking a place-based vision approach to the Peninsula is aligned with Medway's LP approach and the incorporation of the Consortium's proposed vehicle trip budget approach is welcomed. There is more work to do on this and the Consortium expects to work with Medway on incorporating this into the Area-Wide Travel Plan and establishing the practical methodology of this going forward.
- 3.2.3 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.
- 3.2.4 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 Consortium 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.
- 3.2.5 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 Consortium looks forward to further discussion with Medway Council on the determination of a second methodology which accounts for viability.
- 3.2.6 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 Consortium looks forward to further discussion with Medway Council and all relevant Stakeholders on this matter.

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Appendix A Draft Area-Wide Travel Plan

P e l l F r i s c h m a n n

Land at the Hoo Peninsula

Area Wide Travel Plan

August 2025

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Prepared for

Hoo Consortium

Prepared by

Pell Frischmann

5th Floor, 85 Strand
London
WC2R 0DW

Pell Frischmann

Pell Frischmann

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Appendices

Appendix A: Hoo Peninsula Sustainable Transport Strategy

1. Introduction

- 1.1.1. Pell Frischmann (PF) has been commissioned by the Hoo Consortium (the 'Client') to provide transport planning and highways consultancy services and to prepare this place-based Area Wide Travel Plan (AWTP) to provide a Travel Planning Framework for which future developments across the Hoo Peninsula should adhere.
- 1.1.2. An AWTP is a strategic, overarching framework designed to coordinate and guide the development and implementation of Site-Specific Travel Plans (SSTPs) within a defined geographical area. The AWTP sets the strategic vision, objectives and baseline targets for reducing car and promoting sustainable travel. It will also guide the development of the SSTPs within its boundary to achieve cohesion and avoid piecemeal approaches to sustainable transport.
- 1.1.3. Medway Council (MC) is a unitary authority located in the north of Kent, encompassing the Medway towns of Strood, Chatham, Rochester, Gillingham and Rainham, in addition to the Hoo Peninsula and Isle of Grain. Medway Council is both the Local Planning Authority and the Local Highway Authority. The nearby Strategic Road Network (SRN), managed by National Highways (NH), includes the A2 (London to Dover) and the M2 (Medway to Faversham).
- 1.1.4. Whilst this work has been commissioned by the Hoo Consortium, it is intended to be utilised across the Hoo Peninsula. An effective sustainable transport strategy has to be truly holistic, considering contextualised development throughout the region. Therefore, the scope of this AWTP is to consider place-based sustainable transport solutions across the Hoo Peninsula and to feed into the emerging Medway Local Plan. This work has been undertaken with the knowledge of and in discussion with MC.

1.2. Location and Description

1.2.2. Medway

- 1.2.1. Located in north Kent, the towns of Chatham, Rochester, Gillingham, Rainham and Strood collectively form the conurbation of Medway. The River Medway is a key local asset, providing a strong sense of place and identity. However, the river bisects the region forming the Hoo Peninsula; movement south is constrained leaving the Hoo Peninsula to three principal crossings. The severance caused by the river, past commuting flow patterns and travel behaviour, the legacy development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. Crucially, new development must not reinforce historic travel patterns or car dependency; rather, it will support a sustainable, place-based vision for access and movement.
- 1.2.2. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, in particular the proposed Lower Thames Crossing (LTC). The LTC would provide a new road that would link to the A2 and M2 and a tunnel crossing located to the east of Gravesend. New destinations supported by additional infrastructure and technologies are emerging within and around Medway, along with increasing prominence of the decarbonisation agenda.

1.2.3. Hoo Peninsula

- 1.2.3. The Hoo Peninsula is set to see much change in the future with a substantial amount of housing and employment proposed for the area. At the heart of the new development sits the village of Hoo St Werburgh, which is proposed to be a flourishing settlement supported by a transport network that provides fast and effective services that are accessible to all. It is proposed that an improved transport network will extend outwards to connect into existing services, whilst improving connectivity to remote parts of the Peninsula.
- 1.2.4. The study area for the Area Wide Travel Plan is shown in Figure 1-1 below.

Figure 1.1: Strategic Location Map



Source: OpenStreetMap contributors with Pell Frischmann annotations

1.3. Hoo Peninsula Sustainable Transport Strategy

- 1.3.1. Previously, a multi-faceted Sustainable Transport Strategy (STS) was developed by PF for the Hoo Peninsula, in conjunction with MC and NH.
- 1.3.2. This AWTP helps facilitate the STS in order to achieve a sustainable, place-led vision for the Hoo Peninsula which puts people at the forefront of development. The principles and approaches outlined in the STS have been embedded throughout this AWTP. The STS is provided in **Appendix A** and will be referred to throughout this AWTP.

1.4. Scope of Work

- 1.4.1. Travel Plans are important management tools and, when implemented as part of a comprehensive transport strategy, make it possible to achieve modal shift away from private vehicles towards more sustainable forms of travel.
- 1.4.2. Individual, SSTPS are to be produced during the planning process for each new proposed development on the Hoo Peninsula, including residential, employment and school developments.
- 1.4.3. Site-specific Travel Plans are to use this AWTP as the starting point for their own travel and transport strategies. The core principles of this AWTP should be embedded throughout each site-specific Travel Plan, with this AWTP taking a holistic approach to people-orientated travel to, from and on the Hoo Peninsula. It is intended that each site will ambitiously use the core principles of this document alongside emerging strategies in order to respond to the unique travel and transport challenges of each site. Each Travel Plan should be frequently updated and reviewed, reflecting the change in travel habits and demand.

1.5. Report Scope and Structure

1.5.1. This report is structured as follows:

- **Chapter 1: Introduction**
- **Chapter 2: Policy Context.** Review of national, regional and local policy which has shaped the creation of this AWTP
- **Chapter 3: Travel Plans: An Overview.** A summary of the purpose and benefits of Travel Plans.
- **Chapter 4: Travel Plan Development Thresholds.** Thresholds above which Travel Plans should be considered for a site on the Hoo Peninsula
- **Chapter 5: Travel Plan Aims, Objectives and Targets.** Outlined for the AWTP. Site-specific Travel Plans should investigate the possibility of meeting or exceeding this framework.
- **Chapter 6: Travel Plan Content.** Essential content for all Travel Plans outlined.
- **Chapter 7: Travel Plan Measures.** Examples of physical and soft measures applicable to the Hoo Peninsula outlined.
- **Chapter 8: Travel Plan Management Implementation and Enforcement.** Management structures and sanction procedure summarised.
- **Chapter 9: Conclusion**

2. Policy Context

- 2.1.1. This Chapter reviews the local, regional and national policies that have been considered as part of the AWTP. This policy and guidance form a basis for the sustainable transport strategy and informs the design of development on the Hoo Peninsula.

National Policy

- National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, December 2024)
- Department for Transport (DfT) Policy Paper: Strategic Road Network and the Delivery of Sustainable Development (2022)
- Decarbonising Transport – A Better, Greener Britain (DfT, 2021)
- Bus Back Better: National Bus Strategy for England (DfT, 2021)
- Cycle Infrastructure Design Local Transport Note 1/20 (LTN1/20) (DfT, 2020)

Regional Policy

- Emerging Regional Transport Strategy for the South East (Transport for the South East (TfSE), 2024)
- Strategic Investment Plan for the South East (TfSE, 2020)

Local Policy

- Emerging Medway Local Plan 2019-2041 (MC, 2024)
- Hoo St Werburgh and Chattenden Neighbourhood Plan (2023)
- Medway Rights of Way Improvement Plan (MC, 2020)
- Medway Third Local Transport Plan 2011-2026 (MC, 2011)
- Medway Third Local Transport Plan Sustainable Appraisal (MC, 2010)

2.2. National Policy

National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, December 2024)

- 2.2.1. The National Planning Policy Framework is a governmental planning policy document which outlines how planning policies should be applied. The latest version of the Framework was published in December 2024, and it replaces the previous edition of the NPPF.
- 2.2.2. The NPPF acts as guidance for local councils on defining their own neighbourhood and local plans, and this approach allows specific needs and priorities to be delivered (subject to individual communities and neighbourhoods).
- 2.2.3. The underlining focus of the NPPF is to promote 'sustainable development' which is summarised as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.5).
- 2.2.4. The delivery of sustainable developments can be achieved through three objectives (p.5) as highlighted in the NPPF. These are:
- Economic objectives
 - Social objectives
 - Environmental objectives
- 2.2.5. Chapter 9 of the NPPF primarily focuses on the promotion of sustainable developments such that Paragraph 109 (p.31) states:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- a) making transport considerations an important part of early engagement with local communities;
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
- c) understanding and addressing the potential impacts of development on transport networks;
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

2.2.6. Furthermore, paragraph 115 (p.32-33) states that when considering development proposals:

“It should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”

2.2.7. Paragraph 116 (p.33) states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

2.2.8. Within this context, paragraph 117 notes that

“Applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

2.2.9. Paragraph 118 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

2.2.10. In accordance with paragraphs 109 and 118, this AWTP presents the vision-led opportunities of sustainable development on the Hoo Peninsula, in line with the strategies outlined in the STS of **Appendix A**. As per paragraph 117, developments will be principally designed around pedestrians and cyclists whilst maximising access for bus services; developments will be led by people not vehicles.

Strategic Road Network and the Delivery of Sustainable Development (DfT Circular 01/2022, December 2022)

2.2.11. Updated in December 2022, this replaced a 2012 Department for Transport (DfT) circular of the same name.

2.2.12. The purpose of this document is described at Paragraph 9, which states:

“This circular also sets out the way in which the company will engage with the development industry, public bodies and communities to assist the delivery of sustainable development.”

2.2.13. This document states at Paragraph 12 that:

“New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.”

2.2.14. It also states at Paragraph 40, within Section “Statutory requirements”, that

“When consulted on an application for planning permission, the company will issue a formal response to the relevant local planning authority within statutory timeframes. Where appropriate, planning conditions will be recommended to mitigate any unacceptable impacts on the SRN that are identified through the assessment process.”

2.2.15. In Paragraph 47, in the Section “Assessment of Development Proposals”, it states

“Where the company is requested to do so, it will engage with local planning authorities and development promoters at the pre-application stage on the scope of transport assessments/statements and travel plans. This process should determine the inputs and methodology relevant to establishing the potential impacts on the SRN and net zero principles that will inform the design and use of the scheme. Development promoters are strongly encouraged to engage with the company to resolve any potential issues and maximise opportunities for walking, wheeling, cycling, public transport and shared travel, as early as possible.”

2.2.16. And at Paragraph 50:

“An opening year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport impacts of a proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.”

Department for Transport (DfT) Policy Paper: Strategic Road Network and the Delivery of Sustainable Development (2022)

- 2.2.17. This paper discusses how National Highways will collaborate with developers, public bodies, and communities to support sustainable development across the UK. One of the primary goals is achieving net-zero emissions for maintenance and construction by 2040 and net-zero road user emissions by 2050. To meet these targets, new developments should reduce reliance on private car travel and focus on locations that are or can be made sustainable.
- 2.2.18. National Highways is allocated a national budget to prioritise investment in major road projects through the Road Investment Strategy (RIS). This strategy plans investment for a five-year period, and National Highways works with government and key stakeholders to identify future investment needs on the Strategic Road Network (SRN). Within Medway, this will be pertinent to the A2 and M2. Additionally, National Highways collaborates with local authorities to explore alternative funding mechanisms, including public funding and developer contributions, secured through local plans or spatial development strategies.

Bus Back Better: National Bus Strategy for England (DfT, 2021)

- 2.2.19. This strategy outlines a long-term commitment to improving bus services, making them more frequent, reliable, and accessible to increase passenger numbers, reduce congestion, and lower carbon emissions. The vision includes fully integrated services, multi-modal ticketing, enhanced bus priority, reliable real-time information, and frequent service schedules. A key challenge is funding, but the strategy supports LTAs in accessing franchising powers and expects them to create Enhanced Partnerships and a BSIP to secure ongoing central funding. Local policies should reflect the BSIP and integrate housing and employment with enhanced public transport services.

Decarbonising Transport – A Better, Greener Britain (DfT, 2021)

- 2.2.20. This document emphasizes the need to cut greenhouse gas emissions, with transport being the largest contributor, accounting for 27% of emissions in 2019. The UK government aims to achieve a net-zero transport system by 2050 and outlines policies to eliminate fossil fuel use in road transport. Key priorities include shifting to public and active transport and introducing zero-emission buses to connect communities, town centres, and the wider transport network.
- 2.2.21. The strategy also allocates £3 billion to support the National Bus Strategy, focusing on lower fares, more frequent buses, easier-to-use services, more bus priority lanes, and thousands of zero-emission buses. Local authorities were asked to submit BSIPs by October 2021, and related initiatives began in April 2022.

Local Transport Note 1/20 Cycle Infrastructure (2020)

- 2.2.22. Local Transport Note (LTN) 1/20 is a national government document used to “provide guidance and good practice for the design of cycle infrastructure, in support of the Cycling and Walking Investment Strategy.”
- 2.2.23. LTN 1/20 replaces previous guidance provided by LTN 2/08. Chapter 1: Introduction sets out the ambition of the Local Transport Note 1/20 as follows:
- “The statutory Cycling and Walking Investment Strategy (CWIS) sets a clear ambition to make cycling and walking the natural choices for short journeys or as part of a longer journey with supporting objectives to increase cycling and walking levels. This guidance supports the delivery of high-quality cycle infrastructure to deliver this ambition and objective; and reflects current good practice, standards and legal requirements.” (pg. 5)
- 2.2.24. In Paragraph 1.1.1, the summary goes on to set out expectations regarding cycle infrastructure provision:

“Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on five overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and, in particular, when applying for Government funding that includes cycle infrastructure.” (pg. 6)

2.2.25. Chapter 14: Integrating cycling with highway improvements and new developments

“covers the delivery of new and improved cycle infrastructure as an integral part of general highway improvement and maintenance work and in new developments.” (pg. 154)

2.2.26. In addition to this, paragraph 14.1.2 states:

“Appropriate cycle facilities should be provided within all new and improved highways in accordance with the guidance contained in this document, regardless of whether the scheme is on a designated cycle route, unless there are clearly-defined and suitable alternatives.” (pg. 154)

2.2.27. Chapter 4 discusses the ‘Design Principles and Processes’ which are vital as

“Cycle traffic has its own characteristics that are distinct from motor traffic and pedestrian traffic. These should be recognised and incorporated from the outset of the planning and design process.” (pg. 28)

2.2.28. In Paragraph 4.2.2, the five core design principles as a basis for designing for cyclists are:

- “Coherent;
- Direct;
- Safe;
- Comfortable; and
- Attractive.” (pg. 30)

2.3. Regional Policy

Emerging Regional Transport Strategy for the South East (Transport for the South East (TfSE), 2024)

2.3.1. TfSE is the sub-national transport body for the south east of England encompassing 46 district and borough authorities (including Medway Council and Kent County Council). It aims to create a sustainable and integrated transport system that boosts productivity, enhances quality of life, and protects the environment and identifies what regional transport infrastructure is required to unlock the region’s economic growth. Their strategy sets economic, social, and environmental goals, with priorities for each to ensure success. Four primary missions are outlined to deliver this – strategic connectivity, resilience, inclusion and integration, decarbonisation and sustainable growth.

2.3.2. The sustainable growth mission aims to ‘kick start economic growth in the region’, with a key challenge identified as affordable housing in the regions. Transport is seen as a tool which can unlock job and housing growth, especially through third-party investment, as well as enhance place-making.

Strategic Investment Plan for the South East (TfSE, 2020)

2.3.3. TfSE's Strategic Investment Plan (SIP) identifies key investment areas, including decarbonization, supporting left-behind communities, driving regeneration and growth, creating world-class urban transport systems, and enhancing transport network resilience. Their funding model is mixed, with contributions from local authorities and annual grants from the Department for Transport. TfSE is also working on becoming a statutory sub-national transport body to strengthen their case for future investment.

2.4. Local Policy

Emerging Medway Local Plan 2019-2041 (MC, 2024)

- 2.4.1. MC is producing a new LP covering Medway up until 2041. This sets out a vision for future development in the Medway towns and the Hoo Peninsula, ensuring that the needs of the area are met through a number of policies and proposals. This new LP will replace the existing 2003 Local Plan. Hoo Parish Council will continue to make representations at the various stages of the LP's development.
- 2.4.2. There are various potential impacts of the emerging LP for residents on the Hoo Peninsula, as outlined on Medway Council's website¹:
- New Community facilities providing social clubs and activities
 - Improved and updated sports facilities in Hoo
 - Improved transport services for better access around the Peninsula and into other areas in Medway
 - Maintaining the local heritage of the Peninsula, including creating access to green spaces for walking and cycling
 - More options for high quality houses on the Peninsula.
- 2.4.3. Improving the transport connectivity of Medway is a key opportunity, acting as a catalyst for future local development, growth and improved living standards.

Hoo St Werburgh and Chattenden Neighbourhood Plan (MC, 2023)

- 2.4.4. The Hoo St Werburgh and Chattenden Neighbourhood Plan (HSW&CNP) aims to provide the necessary framework to achieve sustainable growth in the area, whilst still considering other factors important to the community. One of five Neighbourhood Plans (NP) instigated by MC, all NPs must meet legal requirements set out in national planning legislation. This NP will be in force until the end of 2040.
- 2.4.5. Paragraph 1.1 states the purpose of the NP:
- “The Hoo Neighbourhood Plan provides a positive strategy for growth, but also helps to ensure that such growth is sustainable, against the context of climate change. This plan does not make additional site allocations, but does make provisions for growth in its policies, including for employment, residential and community facilities. At the same time, there are policies on design, environment and transport to ensure that development is sustainable, environmentally, socially, and economically.” (HSW&CNP, 2023, pg. 6)
- 2.4.6. The planning aims of the Neighbourhood Plan are stated in paragraph 3.2:
- “The Vision will be achieved through the following aims and the policies later in the Plan. The planning aims are:
- A. To ensure that development in the parish and in Hoo St Werburgh village and the hamlet of Chattenden is sustainable and retains their distinctive identities and separation.
 - B. To ensure that development takes account of climate change and biodiversity.
 - C. To maintain or expand the range of community facilities and employment, to create more sustainable work/life patterns and meet the diverse needs of the community.
 - D. To ensure that housing development is well-designed, sustainable and meets a range of local needs.
 - E. To preserve or enhance the natural and historic environments of Hoo St Werburgh and Chattenden Parish.

¹ https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1825/what_the_local_plan_means_for_residents
(last accessed 04/07/2024)

F. To promote sustainable forms of transport and active travel, including cycling and walking.” (HSW&CNP, 2023, pg. 15)

2.4.7. Chapter 8 ‘Travel Infrastructure’ states the aims for the development of Sustainable Transport and increasing incentives to walk by improving pathways in the Hoo. Policy Hoo 11 provides the specific framework for sustainable transport and active travel in Hoo St Werburgh. It states that:

“1. Development that is likely to generate journeys must support a balanced range of transport options, including active travel and sustainable forms of transport, meeting the requirements of this policy proportionate to the scale and nature of the scheme.

2. Parking provision for development should include:

- a. Covered and secure storage for cycles, with electric charging points;
- b. Electric charging points for motor vehicles.

3. Development must be supported by adequate road infrastructure to safely support additional traffic movements, with additional pedestrian crossings where necessary.

4. Development layouts must create a convenient, safe and attractive environment for pedestrians with differing levels of mobility, linking to surrounding paths, community facilities and public transport, and creating good linkages within the site, also meeting the requirements of Policy HOO6.

5. Each new home should include adequate parking provision for the size of property and garages and parking spaces should be adequate to accommodate modern vehicles.

6. New roads should be of sufficient width to allow for easy passage of service vehicles and emergency vehicles and, where appropriate, public transport.” (HSW&CNP, 2023, pg. 66)

Medway Rights of Way Improvement Plan (MC, 2020)

2.4.1. The Medway Rights of Way Improvement Plan (ROWIP) is a strategy document that sets out the Council’s public rights of way (PROW) and access from 2020 to 2030. Medway currently has a network of 438 paths and 186.1 miles. Most of the PROWs are footpaths, which can only be used by people walking. There are also public bridleways, which can be used by pedestrians, horse riders and cyclists, restricted byways, which can be used by all of the above and horse drawn carriage drivers, and byways open to all traffic, including motor vehicles.

2.4.2. PROWs help support the needs of Medway’s residents and ensure residents have a high quality of life. PROWs aid active travel as they can link with roadside pavements and cycle lanes in urban areas. Other PROWs leading from towns to the countryside provide ways for people to make longer journeys. The Council is seeking to increase the role of PROWs in delivering strategic active travel routes and connecting new developments to the surrounding network.

Medway Third Local Transport Plan (2011-2026) (MC, 2010)

2.4.3. Medway’s Local Transport Plan outlines sustainable transport strategies for 2011-2026, aiming to support economic growth through an efficient transport network, improve air quality, and tackle climate change. It focuses on improving public transport, including bus services, and encouraging active travel to reduce reliance on cars especially on local journeys.

Medway Third Local Transport Plan Sustainable Appraisal Report (MC, 2010)

2.4.4. This Sustainable Appraisal evaluates the goals of Medway’s Third Local Transport Plan. This includes the promotion of active transport, the reduction of traffic-related air pollution, and the mitigation of greenhouse gas emissions through a shift to more sustainable modes of transport alongside traffic management strategies.

Other Emerging Documents

- 2.4.5. MC is in the process of finalising a Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP) for the Medway region. As well as the emerging Local Plan, the outcomes of this report are expected to feed into and complement the emerging BSIP and LCWIP

3. Travel Plans: An Overview

3.1. General

- 3.1.1. Travel Plans are important transport management tools and, when implemented as part of a comprehensive transport strategy, make it possible to achieve modal shift away from private vehicles towards more sustainable forms of travel.
- 3.1.2. A Travel Plan can be provided as part of a development proposal to reduce private car-based travel to and from the site. Implementing Travel Plans result in several benefits for the Hoo Peninsula's residents, employees, school children and visitors. Examples of these benefits include:
- Better accessibility for residents and visitors by public and sustainable travel modes;
 - An improved environment for pedestrians and cyclists;
 - Increasing the health and fitness of residents and visitors by encouraging walking and cycling more, leading to an improved quality of life;
 - Reduced travel costs for residents and visitors;
 - Better relations with neighbours and nearby properties, by helping to alleviate congestion around the development;
 - Reduced parking and/or traffic congestion around the Hoo Peninsula;
 - More satisfied and happier residents, workers and visitors increasing the attractiveness of the development;
 - Reducing emissions and improving air quality around developments;
 - The potential to reduce the need for expenditure on new transport infrastructure and
 - Tackling climate change by reducing emissions.

Policy Compliance

- 3.1.3. Travel Plans are consistent national planning policy, which prioritise and promotes the active management of growth patterns to maximise the use of sustainably-orientated forms of transport (including, but not limited to, public transport, walking, and cycling), while concentrating major development in areas that are, or can be made, sustainable.
- 3.1.4. Paragraph 118 of the NPPF states that:
- "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored".

3.2. Planning Submission

Pre-Application / Scoping

- 3.2.1. The need for and requirement of a Travel Plan should be identified at the earliest possible opportunity, with active engagement with MC and other local stakeholders sought in order to maximise its possible effectiveness. Embedding sustainable transport opportunities from the outset of a project is crucial to the overall sustainable success of a scheme.
- 3.2.2. Applicant should look to agree the content of the Travel Plan any suggested measures prior to submission.

Planning Application Submission

- 3.2.3. A Draft Travel Plan should be submitted to MC as part of any planning application, which meets the thresholds set out in Section 4. Any Travel Plan submitted should investigate the potential to be in line with sustainable procedures, principles and/or strategies presented in this AWTP.

3.3. Post Determination

Occupation

- 3.3.1. Each applicant should agree an appointed Travel Plan Co-Ordinator (TPC) with MC prior to occupation and to provide the relevant contact details to MC. The TPC should arrange a baseline travel survey within a previously-agreed specified period of time following occupation (usually 6 months unless agreed otherwise). Further surveys should be arranged at an agreed fixed interval in line with the submitted Travel Plan. These surveys should be undertaken over a five-year monitoring period for years 1,3 and 5.
- 3.3.2. It should also be the responsibility of the TPC to implement and update the action plans identified within the Travel Plans. Travel Plan Monitoring Reports (TPMR) should be submitted to MC, with remedial measures to be possibly implemented if targets are unlikely to be met.

Monitor, Review and Enforcement

- 3.3.3. MC should audit and review the TPMRs submitted by the applicants, with the possibility of enforcement action to be taken if TPMRs are not received in the agreed timeframe, or if targets are not met. Active engagement between MC and the applicant should be undertaken prior to enforcement and/or remedial action.

Travel Plan Working Groups

- 3.3.4. Travel Plan Working Groups (TPWG) should be established in order to identify travel issues and measures that can be implemented in order to promote local active travel and public transport utilisation. These should be established at the earliest relevant opportunity in order to maximise local engagement, and can continue during occupation where required.
- 3.3.5. TPWG for residential developments should comprise of:
- A representative from the developer
 - A resident group
 - Members from the local community
- 3.3.6. TPWG for commercial developments should comprise of:
- Senior management
 - Employees from relevant teams
 - Members from the local community
- 3.3.7. TPWG for schools should comprise of:
- Parents
 - Governors
 - Students
 - Teachers
 - Residents

4. Travel Plan Development Thresholds

- 4.1.1. It is proposed that Travel Plans should be produced for development on the Hoo Peninsula which meet the thresholds outlined below. It is proposed that these thresholds act as a guidance for MC and the applicant, and Travel Plans should be implemented regardless of scale where a development is likely to have a notable impact on the Hoo Peninsula's existing highway network, air quality and/or noise quality.
- 4.1.2. Where Travel Plans are deemed necessary by MC and the applicant to not be relevant, consideration should be given to the provision of measures that can be used to continue to promote the up-take of sustainable travel on site, locally and/or across the Hoo Peninsula.
- 4.1.3. Development under the thresholds stated below which are not required to produce a Travel Plan, will still be expected to contribute via S106 money to ensure that there is a consistent approach to S106 agreements and to mitigate the effect of cumulative smaller schemes coming forward.

4.2. Residential

- 4.2.1. A Travel Plan should be implemented where 80 dwellings or more are proposed.

4.3. Commercial and Retail

- 4.3.1. A Travel Plan should be implemented where developments of quantum exceed the figures set out in the Table below.

Table 4-1 Commercial Threshold

Landuse	Threshold
B2 General industrial	>4,000sqm
B8 Storage or distribution	>5,000sqm
E (a) Display or retail sale of goods, other than hot food	>800sqm
E(b) Sale of food and drink for consumption (mostly) on the premises	>2,500sqm
E(c) Provision of Financial services, professional services (other than health or medical services), or other appropriate services in a commercial, business or service locality	>2,500sqm
E(d) Indoor sport, recreation, or fitness (not involving motorised vehicles or firearms)	>1,500sqm
E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)	>1,000sqm
E(f) Creche, day nursery or day centre (not including a residential use)	>1,000sqm
E(g) Uses which can be carried out in a residential area without detriment to its amenity: (i) Offices to carry out any operational or administrative functions, (ii) Research and development of products or processes (iii) Industrial processes	>2,500sqm

*sqm relates to Gross Floor Area

- 4.3.2. Expansions of existing commercial units which results in a notable increase in employees should also consider the implementation of a Travel Plan.
- 4.3.3. The potential use of Travel Plans should also be investigated for developments located in sustainable locations with restricted car parking, in close proximity to existing or planned sustainable infrastructure and/or services.

4.4. Schools

- 4.4.1. A Travel Plan should be provided for all new schools, and for existing schools applying for a substantial increase in admission numbers due to expansion.
- 4.4.2. Consideration of a Travel Plan should also be given when new facilities are added to a school which are likely to generate additional traffic unrelated to education activities, particularly for those intended for use by the wider community.
- 4.4.3. Modeshift Stars is the UK's Centre of Excellence for the delivery of effective Travel Plans in education, commercial and residential settings. In line with existing MC guidance, Modeshift STARS is approved to help to create Travel Plans for schools.

5. Travel Plan Aims, Objectives and Targets

- 5.1.1. This chapter sets out the overarching aims and objectives for the overall AWTP. Ambitious but appropriate sustainable targets are also outlined.
- Objectives are the high-level aims of Travel Plans. They help to give a Travel Plan direction and provide a clear focus.
 - Targets are the measurable goals by which progress will be assessed. Targets should be reviewed and updated when appropriate.
- 5.1.2. The targets set out in this AWTP are intended as a guide for developments on the Hoo Peninsula. Site-specific Travel Plans should determine their own, individual unique to each development's location, scale and form.
- 5.1.3. During the process of creating a site-specific Travel Plan, the applicant should investigate the potential to be compliant with the aims, objectives and spirit of this AWTP. Applicants should, where possible, investigate the feasibility of reaching and/or exceeding the targets set out in this AWTP.

5.2. Place-Based Vision for the Hoo Peninsula

- 5.2.1. As outlined in the latest update to the NPPF, a vision-led approach is fundamental to the promotion of sustainable development. The core sustainable place-based vision, as outlined in the STS of **Appendix A**, is outlined below.

THE CORE VISION

Achieve economically prosperous and inclusive low-carbon development on the Hoo Peninsula by integrating sustainable, active, and public transport into new developments. This people-focused, modern approach shifts away from traditional, vehicle-centric urban design, prioritising people at the top of the street user hierarchy.

5.3. Travel Plan Aims

- 5.3.1. The aim of this AWTP is to:
- Provide a vision-led guidance framework for site-specific Travel Plans in order to facilitate sustainable, people-orientated development across the Hoo Peninsula. Each site-specific Travel Plan is to form part of the validation for the core sustainable place-based vision.

5.4. Travel Plan Objectives

- 5.4.1. The objective of the ATWP is to:
- Engage with and encourage residents, employees and visitors of the Hoo Peninsula to use more sustainable ways of travelling to / from and across the Hoo Peninsula through effective promotion of active modes and public transport services. This is in order to minimise the impact of developments on the local highway network.
- 5.4.2. This is to be achieved through the following sub-objectives:
- Sub-objective 1: To increase resident, employee and visitor awareness of the advantages and availability of sustainable, public transport and active travel modes transport;
 - Sub-objective 2: To promote the health and fitness benefits of active travel to all users;
 - Sub-objective 3: To introduce a package of physical and management measures that will facilitate resident, employee and visitor travel by sustainable modes; and

- Sub-objective 4: To reduce unnecessary use of cars when travelling to / from the Hoo Peninsula, particularly by utilising enhanced bus networks with connections into railheads via Bus Rapid Transit (BRT).
- Sub-objective 5: To reduce unnecessary use of cars when across the Hoo Peninsula, particularly by utilising enhanced local bus networks, cycle facilities and walking infrastructure, cohesively linked together.

5.5. Travel Plan Targets

5.5.1. Targets are measurable goals by which the progress of the plan will be assessed. Targets are essential for monitoring the progress and success of the Plan and have been designed to be 'SMART' (Specific, Measurable, Achievable, Realistic and Time-bound).

- Specific – the targets will aim to specifically promote walking and cycling to those residents working within a reasonable distance of the site. Those that can combine public transport travel will be actively encouraged. The targets will be set using the travel mode results from the baseline travel survey.
- Measurable – the targets would be measurable, based on the results of the baseline travel survey and review surveys thereafter, to be carried out at key milestones over the lifecycle of the Travel Plan.
- Achievable and Realistic – the targets should be achievable and not unrealistic, they should be set in relation to the results of the baseline travel survey.
- Time-bound – The lifetime of the Travel Plan will be continuous through the construction and completion of the proposed development, with monitoring expected on a biennial basis for five years.

5.5.2. Targets come in two forms – 'Action' and 'Aim' targets. Action targets are non-quantifiable actions that need to be achieved by a certain milestone, whereas aim targets are quantifiable and generally relate to the degree of modal shift the Travel Plan seeks to achieve.

5.5.2. Action Targets

5.5.3. The key action targets proposed for site-specific Travel Plans are set out below:

- To appoint the TPC prior to occupation.
- To install physical/hard Travel Plan measures as appropriate (that form part of the proposed development e.g. cycle parking, car sharing bays).
- To agree the scope of the multi-modal site-wide baseline travel survey with MC prior to the first one being undertaken and undertake that survey within one month of 75% occupation of the site.
- To undertake monitoring surveys on or around the anniversary of the baseline travel survey at one, three and five years after that initial baseline survey.
- To collate and submit monitoring survey results to MC, within a specified time of survey date, for review and consideration.
- To set up a Working Group by a specified date agreed with MC.

5.5.3. Aim Targets

5.5.4. The initial targets aimed for the development on the Hoo Peninsula is proposed as follows:

- To reduce the level of car trips which will be established following baseline surveys;
- To promote the use of Ultra Low Emission Vehicles (ULEVs);
- To promote car club and car share;
- To ensure minimal negative impact on air quality or congestion occurs as a result of the proposed development;
- To increase the number of people walking or cycling;
- To increase the number of people using local public transport;
- To implement and increase patronage of BRT networks where applicable;

- To increase the number of people using the regional rail network; and
- To increase sustainable, multi-modal trips in conjunction with different modes of public transport and active travels.

5.5.5. It should be noted that the above targets are provisional and subject to refinement and confirmation following baseline surveys.

5.5.6. Targets will be monitored through the baseline surveys as part of the Travel Plan monitoring process, and at one, three and five years after baseline travel surveys whereby the reduction target should be achieved, if not, further Travel Plan measures may need to be implemented.

5.5.7. Specific numerical targets will be defined in each Travel Plan, as different targets for each company type are needed. This will allow targets to be ambitious and realistic for each company rather than applying the same targets to all.

6. Travel Plan Content

6.1. Essential Content

6.1.1. As a minimum, all site-specific Travel Plans should include:

- The proposed development, location and relevant transport links;
- Details of any associated highway schemes, public transport improvements or any other transport mitigations to be provided as part of the planning application;
- Approximate number of employees, residents and/or visitors anticipated to access the proposed development;
- Details of proposed facilities to encourage the uptake of sustainable travel;
- Details of the TPC's role;
- Details of promotion and marketing;
- Clear and achievable aims, objectives and targets. Think SMART (Specific, Measurable, Achievable, Relevant and Time-bound);
- Who the measures are targeted towards;
- An action plan, with timescales and the implementation responsibility outlined;
- Details of monitoring and management procedures; and

6.1.2. School travel plans on the Hoo Peninsula should be produced in line using the Modeshift STARS Education scheme where possible. Special Educational Needs and Disability (SEND) schools may require bespoke Travel Plans for their own unique travel demands.

6.2. Travel Plan Management

6.2.1. Each site-specific Travel Plan is to be implemented and managed by a Travel Plan Co-Ordinator (TPC). The TPC, with relevant contact details, are to be clearly identified in every site-specific Travel Plan. The appointed TPC is also responsible for reviewing and where necessary updating the site-specific Travel Plan.

6.2.2. The responsibility for appointing and funding the TPC is the developer's; site-specific Travel Plans must therefore describe who has responsibility for implementation at each stage of the site-specific Travel Plan. For sites in which the final occupier will be someone other than the developer, details of this handover period should be specified.

6.2.3. To maximise the effective implementation of Travel Plan, the TPC must be in place and actively engaged throughout the life of the Travel Plan.

7. Travel Plan Measures

- 7.1.1. The following section outlines a range of measures that may be implemented so that a variety of suitable, easily accessible alternatives to car travel are available to the Hoo Peninsula's residents, employees and visitors. With the suggested measures in place, development on the Hoo Peninsula can contribute towards national and local sustainability objectives, ensuring residents, employees and visitors are aware of the choice of sustainable travel options available to them on the Hoo Peninsula.
- 7.1.2. To encourage sustainable, the measures used must be considered attractive and convenient. Every effort has been made to include measures appropriate to the Hoo Peninsula and the initiatives provided are by no means exhaustive. Travel Plans are evolving documents in response to new travel and transport opportunities that may arise, and as such, future reviews may result in an update of current measures.
- 7.1.3. These measures can be split into two types:
- 'Hard' or 'Physical' Measures - engineering / architectural measures incorporated into the design of the proposed development e.g. cycle parking provision; and
 - 'Soft' Measures - marketing and management measures implemented as part of the proposed development on an on-going basis in order to maximise the uptake of sustainable travel measures and in order to reduce dependency on private cars, particularly single occupancy trips.
- 7.1.4. The developers will retain responsibility for the provision of 'hard' measures until the site is completed, ready for occupation. The hard measures, such as pedestrian and cycle infrastructure and its network reach throughout the development, will be developed concurrently with the proposed layout. Site-specific Travel Plans will identify the specific hard measures and ensure their incorporation within the site.

7.2. Physical Measures

- 7.2.1. Specific physical measures, unique to each site's location, size and form, should be determined for each site. Each site should investigate the possibility of providing a range of incentives and/or money towards particular sustainable transport measures. Examples of measures applicable for the Hoo Peninsula which need to be considered include:
- Changing facilities, such as showers, lockers, changing rooms and drying areas for wet clothing at employment developments;
 - Green sustainable travel corridors with active travel routes alongside BRT routes;
 - Dedicated cycle routes between employment and residential areas;
 - Cycle maintenance equipment stations, e.g. tyre pumps and puncture repair kits;
 - Storage areas for buggies and pushchairs in nurseries and primary schools;
 - Information noticeboards, detailing sustainable travel information;
 - Car club vehicles;
 - Real-time passenger information;
 - Car parking spaces allocated to lift share only use; and
 - Use of Mobility Hubs.
- 7.2.2. It is noted that not all these measures will be appropriate to all new development sites and all measures should be considered on a case-by-case basis.

7.3. Soft Measures

- 7.3.1. Specific soft measures, unique to each site's location, size and form, should be determined for each site. Each site should investigate the possibility of providing a range of incentives and/or money towards particular sustainable transport measures. Examples of measures applicable for the Hoo Peninsula include:
- Promotion of cycle training;
 - Introduction of Cycle to Work scheme for employees;
 - Introduction of interest free season ticket loans for employees;
 - Active travel event participation in schools and places of work. E.g. Bike Week;
 - Guaranteed lift home scheme for employees;
 - High-speed internet provision; and
 - The promotion of sustainable travel through travel information packs, webpages and social media. Could include local bus and rail maps, bus and rail timetables, maps showing local walking and cycling routes, maps showing local cycle parking, information regarding lift-sharing, local car clubs schemes, map showing local electric charging facilities, information on the benefits of active travel.
- 7.3.2. Further detail is provided in the Sustainable Transport Strategy for the Hoo Peninsula as shown in **Appendix A**; it should be used in conjunction with this document.

7.4. Action Plan

- 7.4.1. An action plan, specifying at least the action, target, target date, funding originator, responsibility and performance indicator for each measure, should be outlined in each site-specific Travel Plan.

8. Travel Plan Management, Implementation and Enforcement

8.1. Monitoring and Review

- 8.1.1. The hard measures will begin to be implemented as the sites on the Hoo Peninsula are built out and prior to occupation. Travel Plan soft measures should begin to be implemented within one month of first occupation of each site in order to capture sustainable travel modes prior to habit forming. Remaining measures will be implemented gradually as more of the site is built-out and occupied.
- 8.1.2. With regards to the baseline travel surveys, the TPC for each site should arrange an initial TRICS UK Standard Assessment Methodology (SAM) compliant multi-modal survey or comparable to be undertaken within one month of 75% occupation of the site. Further, the full multi-modal travel surveys will then be undertaken on or around the first anniversary of the initial survey and biennially thereafter (for up to five years from the date of the baseline survey). These subsequent surveys will include the additional users that have moved into the site in the meantime. Therefore, the survey sample will increase year-on-year and in turn become more representative of the site population as a whole.
- 8.1.3. The specification and scope of the multi-modal surveys will be agreed with MC prior to the first one being undertaken, with consideration given to the consistency of each subsequent survey (in order that they remain comparable when monitoring takes place). The surveys are likely to comprise the following components:
- TRICS UK Standard Assessment Methodology (SAM) compliant multi-modal survey (or comparable survey);
 - Questionnaire surveys– including open questions focusing on reasons for car use and barriers / constraints to using sustainable travel modes, awareness of alternative modes and incentives;
 - Cycle parking utilisation survey; and
 - Car parking utilisation survey.

8.2. Reporting

- 8.2.1. The TPC of each site should report the monitoring survey results to MC after each survey. As appropriate, key survey and/or monitoring findings and associated sustainability messages will also be disseminated amongst residents potentially via each site's Working Group.

8.3. Enforcement

- 8.3.1. The enforcement of the site-specific Travel Plans is essential to ensure that targets are met and the impact of development at a site-level and Peninsula-level is managed, monitored and mitigated successfully.
- 8.3.2. Site-specific Travel Plans should clearly demonstrate the sanctions that will apply in the event that targets are not met. Examples of penalties that might apply include:
- Funding of additional annual surveys until such time as the targets are met; and
 - Implementation of additional mitigation measures, which may be held in reserve. Such measures could be implemented either on or off site (or both) and would be costed and agreed with MC prior to the Travel Plan being approved.

9. Conclusion

- 9.1.1. Pell Frischmann (PF) has been commissioned by the Hoo Consortium (the 'Client') to provide transport planning and highways consultancy services and to prepare this place-based Area Wide Travel Plan (AWTP) to accompany proposals relating to developments across the Hoo Peninsula, Medway, Kent.
- 9.1.2. Medway Council (MC) is a unitary authority located in the north of Kent, encompassing the Medway towns of Strood, Chatham, Rochester, Gillingham and Rainham, in addition to the Hoo Peninsula and Isle of Grain. Medway Council is both the Local Planning Authority and the Local Highway Authority. The nearby Strategic Road Network (SRN), managed by National Highways (NH), includes the A2 (London to Dover) and the M2 (Medway to Faversham).
- 9.1.3. Whilst this work has been commissioned by the Hoo Consortium, it is intended to be utilised across the Hoo Peninsula. An effective sustainable transport strategy has to be truly holistic, considering contextualised development throughout the region. Therefore, the scope of this AWTP is to consider place-based sustainable transport solutions across the Hoo Peninsula and to feed into the emerging Medway Local Plan. This work has been undertaken with the knowledge of and in discussion with MC.
- 9.1.4. Relevant national, regional and local policy has been reviewed and has informed the creation of this AWTP. This AWTP forms part of the vision-led sustainable transport strategy for the Hoo Peninsula, with the aims, objectives and measures outlined in the AWTP forming part of the validation for the vision.
- 9.1.5. The purpose and benefits of Travel Plans has been outlined, with a threshold proposed above which all developments should consider the utilisation of a Travel Plan.
- 9.1.6. This AWTP aims to provide a vision-led guidance framework for site-specific Travel Plans in order to facilitate sustainable, people-orientated development across the Hoo Peninsula. Each site-specific Travel Plan is to form part of the validation for the core sustainable place-based vision. A range of objectives, sub-objectives and measurable targets deemed necessary to facilitate both the AWTP's aim and the wider place-led vision are also outlined. Every site should create their own sustainable aims, objectives and targets, however the principles outlined in this AWTP should be investigated where possible.
- 9.1.7. Content essential to each site-specific Travel Plans has been listed, with detailed measures specific to the Hoo Peninsula proposed. A range of example 'soft' and 'hard' measures, applicable to residential and commercial development are specified; site-specific Travel Plans can use these examples as a starting point, but should determine measures appropriate unique to their site.

Appendix A: Hoo Peninsula Sustainable Transport Strategy

P e l l F r i s c h m a n n

Land at the Hoo Peninsula

Sustainable Transport Strategy

August 2025

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.						
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Prepared for

Hoo Consortium

Prepared by

Pell Frischmann

First Floor
55 Baker Street
London
W1U 8EW

Pell Frischmann

Pell Frischmann

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Appendix A - Multi-Modal TRICS Data

Appendix B - Geospatial Analysis

1. Introduction

- 1.1.1. Pell Frischmann (PF) has been commissioned by the Hoo Consortium (the 'Client') to provide transport planning and highways consultancy services and to prepare this place-based Sustainable Transport Strategy (STS) to accompany proposals relating to developments at Hoo St Werburgh on the Hoo Peninsula, Medway, Kent.
- 1.1.2. Medway Council (MC) is a unitary authority located in the north of Kent, encompassing the Medway towns of Strood, Chatham, Rochester, Gillingham and Rainham, in addition to the Hoo Peninsula and Isle of Grain. Medway Council is both the Local Planning Authority and the Local Highway Authority. The nearby Strategic Road Network (SRN), managed by National Highways (NH), includes the A2 (London to Dover) and the M2 (Medway to Faversham).
- 1.1.3. Whilst this work has been commissioned by the Hoo Consortium, it is intended to have implications across the Hoo Peninsula. An effective STS has to be truly holistic, considering contextualised development throughout the region. Therefore, the scope of this work is to consider place-based sustainable transport solutions across the Hoo Peninsula and to feed into the emerging Medway Local Plan. This work has been undertaken with the knowledge of and in discussion with MC and NH.
- 1.1.4. The data related to the local plan and allocations has been provided by Medway and may need refining following the publication of the Reg 19 material.

1.2. Location and Description

1.2.2. Medway

- 1.2.1. Located in north Kent, the towns of Chatham, Rochester, Gillingham, Rainham and Strood collectively form the conurbation of Medway. The River Medway is a key local asset, providing a strong sense of place and identity. However, the river bisects the region forming the Hoo Peninsula; movement is constrained leaving the Hoo Peninsula by three principal crossings. The severance caused by the river, past commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. Crucially, new development must not reinforce historic travel patterns or car dependency; rather, it will support a place-based vision for access and movement.
- 1.2.2. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, in particular the proposed Lower Thames Crossing (LTC). The LTC would provide a new road that would link to the A2 and M2 and a tunnel crossing located to the east of Gravesend. New destinations supported by additional infrastructure and technologies are emerging within and around Medway, along with increasing prominence of the decarbonisation agenda.

1.2.3. Hoo Peninsula

- 1.2.3. The Hoo Peninsula is set to see much change in the future with a substantial amount of housing and employment proposed for the area. At the heart of the new development sits the village of Hoo St Werburgh, which is to be a flourishing settlement supported by a transport network that provides fast and effective services that are accessible to all. It is proposed that an improved transport network will extend outwards to connect into existing services, whilst improving connectivity to remote parts of the Peninsula.
- 1.2.4. The study area for the document is shown in the Figure below and covers the three main Middle Super Output Areas on the Hoo Peninsula.

Figure 1.1: Strategic Local Map



Source: OpenStreetMap contributors with Pell Frischmann annotations

1.3. Previous Work to Date

1.3.1. This STS builds on previous work undertaken by PF and MC. Specifically, this STS builds on the following work:

- Medway Local Plan Forecasting Methodology Technical Note, Medway Council, January 2024
- Medway Local Plan Validation Report, Medway Council, January 2024
- Medway Local Plan Transport Model Forecasting Report (MTMFR), Medway Council, May 2024
- Hoo STS: Sustainable Transport Methodology Technical Note, Pell Frischmann, August 2024 (doc ref. 109345-XX-XX-DR-TR-000001)
- Hoo STS: Sustainable Transport Mode Share Methodology, Pell Frischmann, January 2025 (doc ref. 109345-XX-XX-RP-TR-000002)

1.3.2. It should be emphasised that this STS builds on and is supplementary to, not replacing of, previous work undertaken by MC and KCC. Namely, where the previous modelling and the MTMFR focuses on vehicle trip generation, this STS focuses on multi-modal trip generation and considers the feasibility of sustainable modal shifts, as recommended in Paragraph 7.2 of the MTMFR.

1.4. Report Scope and Structure

1.4.1. The report is structured as follows:

- **Chapter 1 - Policy Review.** Summary of relevant transport and planning policies
- **Chapter 2 - Baseline Transport Conditions.** Existing highway, public transport and active travel infrastructure in the region
- **Chapter 3 - Place-based Vision for the Hoo Peninsula.** Place-led vision, strategic objectives and sustainable principles outlined.
- **Chapter 4 - Sustainable Transport Modelling – Baseline.** Multi-modal modelling baseline
- **Chapter 5 - Sustainable Transport Strategies.** Achievable strategies to fulfil the place-led vision.

- **Chapter 6 - Sustainable Transport Modelling – Fulfilled Vision.** Multi-modal mode shares following strategic sustainable interventions and realisation of the vision-led strategy
- **Chapter 7 - Realised Vision for the Hoo Peninsula.** The tangible, everyday realities of the fulfilment of the sustainable transport strategy on the Hoo Peninsula
- **Chapter 8 - Summary and Conclusions**

2. Policy Review

2.1. Introduction

- 2.1.1. This Chapter reviews the local, regional and national policies that have been considered as part of the STS. This policy and guidance form a basis for the sustainable transport strategy and the design of development on the Hoo Peninsula.
- 2.1.2. The following policy has been reviewed and considered as part of this strategy:

National Policy

- National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, December 2024)
- Department for Transport (DfT) Policy Paper: Strategic Road Network and the Delivery of Sustainable Development (2022)
- Decarbonising Transport – A Better, Greener Britain (DfT, 2021)
- Bus Back Better: National Bus Strategy for England (DfT, 2021)
- Cycle Infrastructure Design Local Transport Note 1/20 (LTN1/20) (DfT, 2020)

Regional Policy

- Emerging Regional Transport Strategy for the South East (Transport for the South East (TfSE), 2024)
- Emerging Kent Local Transport Plan 5 (Kent County Council (KCC), 2024)
- Sustainable Transport Strategy for Gravesham (Gravesham Borough Council, 2024)
- Kent Bus Service Improvement Plan (BSIP) (KCC, 2021)
- Strategic Investment Plan for the South East (TfSE, 2020)
- Kent Active Travel Strategy (KCC, 2016)

Local Policy

- Emerging Medway Local Plan 2019-2041 (MC, 2024)
- Hoo St Werburgh and Chattenden Neighbourhood Plan (2023)
- Medway Rights of Way Improvement Plan (MC, 2020)
- Medway Third Local Transport Plan 2011-2026 (MC, 2011)
- Medway Third Local Transport Plan Sustainable Appraisal (MC, 2010)

2.2. National Policy

National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, December 2024)

- 2.2.1. The National Planning Policy Framework is a governmental planning policy document which outlines how planning policies should be applied. The latest version of the Framework was published in December 2024, and it replaces the previous edition of the NPPF.
- 2.2.2. The NPPF acts as guidance for local councils on defining their own neighbourhood and local plans, and this approach allows specific needs and priorities to be delivered (subject to individual communities and neighbourhoods).
- 2.2.3. The underlining focus of the NPPF is to promote ‘sustainable development’ which is summarised as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’ (p.5).
- 2.2.4. The delivery of sustainable developments can be achieved through three objectives (p.5) as highlighted in the NPPF. These are:

- Economic objectives
- Social objectives
- Environmental objectives

2.2.5. Chapter 9 of the NPPF primarily focuses on the promotion of sustainable developments such that Paragraph 109 (p.31) states:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

- a) making transport considerations an important part of early engagement with local communities;
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
- c) understanding and addressing the potential impacts of development on transport networks;
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

2.2.6. Furthermore, paragraph 115 (p.32-33) states that when considering development proposals:

“It should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”

2.2.7. Paragraph 116 (p.33) states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

2.2.8. Within this context, paragraph 117 notes that

“Applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

- 2.2.9. Paragraph 118 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”
- 2.2.10. In accordance with paragraphs 109 and 118, this STS presents a vision-led assessment of the conditions and opportunities on the Hoo Peninsula. As per paragraph 117, developments will be principally designed around pedestrians and cyclists whilst maximising access for bus services; developments will be led by people not vehicles.

Strategic Road Network and the Delivery of Sustainable Development (DfT Circular 01/2022, December 2022)

- 2.2.11. Updated in December 2022, this replaced a 2012 Department for Transport (DfT) circular of the same name.
- 2.2.12. The purpose of this document is described at Paragraph 9, which states:
“This circular also sets out the way in which the company will engage with the development industry, public bodies and communities to assist the delivery of sustainable development.”
- 2.2.13. This document states at Paragraph 12 that:
“New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.”
- 2.2.14. It also states at Paragraph 40, within Section “Statutory requirements”, that
“When consulted on an application for planning permission, the company will issue a formal response to the relevant local planning authority within statutory timeframes. Where appropriate, planning conditions will be recommended to mitigate any unacceptable impacts on the SRN that are identified through the assessment process.”
- 2.2.15. In Paragraph 47, in the Section “Assessment of Development Proposals”, it states
“Where the company is requested to do so, it will engage with local planning authorities and development promoters at the pre-application stage on the scope of transport assessments/statements and travel plans. This process should determine the inputs and methodology relevant to establishing the potential impacts on the SRN and net zero principles that will inform the design and use of the scheme. Development promoters are strongly encouraged to engage with the company to resolve any potential issues and maximise opportunities for walking, wheeling, cycling, public transport and shared travel, as early as possible.”
- 2.2.16. And at Paragraph 50:
“An opening year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport impacts of a proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.”

Department for Transport (DfT) Policy Paper: Strategic Road Network and the Delivery of Sustainable Development (2022)

- 2.2.17. This paper discusses how National Highways will collaborate with developers, public bodies, and communities to support sustainable development across the UK. One of the primary goals is achieving net-zero emissions for maintenance and construction by 2040 and net-zero road user emissions by 2050. To meet these targets, new developments should reduce reliance on private car travel and focus on locations that are or can be made sustainable.
- 2.2.18. National Highways is allocated a national budget to prioritise investment in major road projects through the Road Investment Strategy (RIS). This strategy plans investment for a five-year period, and National Highways works with government and key stakeholders to identify future investment needs on the Strategic Road Network (SRN). Within Medway, this will be pertinent to the A2 and M2. Additionally, National Highways collaborates with local authorities to explore alternative funding mechanisms, including public funding and developer contributions, secured through local plans or spatial development strategies.

Bus Back Better: National Bus Strategy for England (DfT, 2021)

- 2.2.19. This strategy outlines a long-term commitment to improving bus services, making them more frequent, reliable, and accessible to increase passenger numbers, reduce congestion, and lower carbon emissions. The vision includes fully integrated services, multi-modal ticketing, enhanced bus priority, reliable real-time information, and frequent service schedules. A key challenge is funding, but the strategy supports LTAs in accessing franchising powers and expects them to create Enhanced Partnerships and a BSIP to secure ongoing central funding. Local policies should reflect the BSIP and integrate housing and employment with enhanced public transport services.

Decarbonising Transport – A Better, Greener Britain (DfT, 2021)

- 2.2.20. This document emphasizes the need to cut greenhouse gas emissions, with transport being the largest contributor, accounting for 27% of emissions in 2019. The UK government aims to achieve a net-zero transport system by 2050 and outlines policies to eliminate fossil fuel use in road transport. Key priorities include shifting to public and active transport and introducing zero-emission buses to connect communities, town centres, and the wider transport network.
- 2.2.21. The strategy also allocates £3 billion to support the National Bus Strategy, focusing on lower fares, more frequent buses, easier-to-use services, more bus priority lanes, and thousands of zero-emission buses. Local authorities were asked to submit BSIPs by October 2021, and related initiatives began in April 2022.

Local Transport Note 1/20 Cycle Infrastructure (2020)

- 2.2.22. Local Transport Note (LTN) 1/20 is a national government document used to “provide guidance and good practice for the design of cycle infrastructure, in support of the Cycling and Walking Investment Strategy.”
- 2.2.23. LTN 1/20 replaces previous guidance provided by LTN 2/08. Chapter 1: Introduction sets out the ambition of the Local Transport Note 1/20 as follows:
- “The statutory Cycling and Walking Investment Strategy (CWIS) sets a clear ambition to make cycling and walking the natural choices for short journeys or as part of a longer journey with supporting objectives to increase cycling and walking levels. This guidance supports the delivery of high-quality cycle infrastructure to deliver this ambition and objective; and reflects current good practice, standards and legal requirements.” (pg. 5)

2.2.24. In Paragraph 1.1.1, the summary goes on to set out expectations regarding cycle infrastructure provision:

“Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on five overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and, in particular, when applying for Government funding that includes cycle infrastructure.” (pg. 6)

2.2.25. Chapter 14: Integrating cycling with highway improvements and new developments

“covers the delivery of new and improved cycle infrastructure as an integral part of general highway improvement and maintenance work and in new developments.” (pg. 154)

2.2.26. In addition to this, paragraph 14.1.2 states:

“Appropriate cycle facilities should be provided within all new and improved highways in accordance with the guidance contained in this document, regardless of whether the scheme is on a designated cycle route, unless there are clearly-defined and suitable alternatives.” (pg. 154)

2.2.27. Chapter 4 discusses the ‘Design Principles and Processes’ which are vital as

“Cycle traffic has its own characteristics that are distinct from motor traffic and pedestrian traffic. These should be recognised and incorporated from the outset of the planning and design process.” (pg. 28)

2.2.28. In Paragraph 4.2.2, the five core design principles as a basis for designing for cyclists are:

- “Coherent;
- Direct;
- Safe;
- Comfortable; and
- Attractive.” (pg. 30)

2.3. Regional Policy

Kent Emerging Local Transport Plan 5 (Kent County Council (KCC), 2024)

2.3.1. Whilst MC is a unitary authority with KCC having no direct authority in planning matters in Medway, the scale of the developments on the Hoo Peninsula and the high-level strategic thinking used in the development of this STS means that wider regional context should be considered for completeness. Long term planning should complement this context.

2.3.2. Kent’s emerging Local Transport Plan, currently under development, will include policy outcomes based on public consultations and will likely reflect sustainable transport priorities in the region. The following policy outcomes are expected:

Figure 2.1: Proposed Policy Outcomes, KCC Draft Local Plan



Source: Figure 7, Local Transport Plan 5 (KCC)

Emerging Regional Transport Strategy for the South East (Transport for the South East (TfSE), 2024)

- 2.3.3. TfSE is the sub-national transport body for the south east of England encompassing 46 district and borough authorities (including Medway Council and Kent County Council). It aims to create a sustainable and integrated transport system that boosts productivity, enhances quality of life, and protects the environment and identifies what regional transport infrastructure is required to unlock the region's economic growth. Their strategy sets economic, social, and environmental goals, with priorities for each to ensure success. Four primary missions are outlined to deliver this – strategic connectivity, resilience, inclusion and integration, decarbonisation and sustainable growth.
- 2.3.4. The sustainable growth mission aims to 'kick start economic growth in the region', with a key challenge identified as affordable housing in the regions. Transport is seen as a tool which can unlock job and housing growth, especially through third-party investment, as well as enhance place-making.

Draft Sustainable Transport Strategy for Gravesham (Gravesham Borough Council (GBC), 2024)

- 2.3.5. Bordering MC to the west, large scale development in Gravesham is anticipated to impact the local highway network and is shown to be a key local trip attractor with onward connections also possible to London; there must be consideration of Gravesham's wider strategic framework. The strategy aims to help reduce the borough's contribution to climate change and prioritises an increased use in low-carbon transport, including walking, cycling and public transport. High-quality public transport to a variety of employment, residential and tourist destinations is required, alongside enhanced network of public rights of way and an expanded safe and welcoming cycle network.

Kent Bus Service Improvement Plan (BSIP) (KCC, 2021)

- 2.3.6. KCC, working with 39 bus operators, developed the Kent BSIP to align with the National Bus Strategy. The BSIP aims to reduce journey times, increase service reliability, boost passenger numbers and satisfaction, and lower vehicle emissions. A central goal is placing buses at the heart of transport planning for new road schemes and developments to improve journey times on key routes.

Strategic Investment Plan for the South East (TfSE, 2020)

- 2.3.7. TfSE's Strategic Investment Plan (SIP) identifies key investment areas, including decarbonization, supporting left-behind communities, driving regeneration and growth, creating world-class urban transport systems, and enhancing transport network resilience. Their funding model is mixed, with contributions from local authorities and annual grants from the Department for Transport. TfSE is also working on becoming a statutory sub-national transport body to strengthen their case for future investment.

Kent Local Transport Plan 4 2016 – 2031 (KCC, 2016)

- 2.3.8. KCC Council adopted their Local Transport Plan (LTP) in 2016, superseding their previous LTP of 2011. It contains strategic transport policies for the county, implementation plans and a methodology for prioritising funding. It details key transport priorities and longer-term transport objectives.
- 2.3.9. In the section 'Outcomes for Transport', KCC aims:
- "to deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported."
- 2.3.10. KCC has five objectives to achieve this:
- "Economic growth and minimised congestion. Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.
 - Affordable and accessible door-to-door travel. Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.
 - Safer travel. Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.
 - Enhanced environment. Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.
 - Better health and wellbeing. Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.
- 2.3.11. This shows that the LTP prioritises economic growth, alongside balancing good road management, reduced congestion and improving the environment.
- 2.3.12. Outlined in the LTP there are ten KCC strategic transport policies intended to "deliver Growth without Gridlock" (LTP, 2016, pg. 10). A further six countywide priorities are identified:
- "Road Safety
 - Highway Maintenance and Asset Management
 - Home to School Transport
 - Active Travel
 - Public Rights of Way
 - Aviation".

Kent Active Travel Strategy (KCC, 2016)

- 2.3.13. This Active Travel Strategy document (ATS) was introduced in 2016 by KCC, aiming to make active travel an attractive and realistic choice for short term journeys. It aims to make Kent a "pioneering county" in active travel (ATS, 2016, pg. 3) and forms a basis on which KCC can prioritise internal resources, influence how new communities are developed and inform external funding bids.

- 2.3.14. It outlines the benefits of active travel (namely physical activity, improved air quality, economic benefits) and the current barriers to active travel in Kent:

“A perceived lack of suitable continuous routes between homes and community services, workplaces or schools, and not enough promotion of existing routes. Other issues include a lack of facilities such as lockers and secure bicycle parking, obstacles in cycle lanes and in footways, and perception of safety when walking and cycling. Another barrier to active travel is the convenience of using a car, especially to carry heavy or bulky loads, and the need to make linked trips such as a school drop-off on the way to work”. (ATS, 2016, pg. 5)

- 2.3.15. In ‘Section 8 – Our ambition’, three actions are outlined to deliver their ambitions:

“Action 1: Integrate active travel into planning

Action 2: Provide and maintain appropriate routes for active travel

Action 3: Support active travel in the community” (ATS, 2016, pg. 11)

- 2.3.16. The integration of active travel into planning is expanded on in ‘Section 10 – Delivering the actions’:

“Inform the development and application of the County Council’s transport policies through the Local Transport Plan

Support district and borough councils to ensure that active travel is used to deliver sustainable growth and development through local plans and in determining planning applications

Use the principles and ambitions of KCC’s Active Travel Strategy to influence partner policies and strategies

Work with developers to ensure active travel routes are a priority, both within developments and linking Site to other services, community facilities and transport hub

Work with developers to secure sufficient areas within developments for green spaces and attractive routes and environments that encourage active travel

Work with strategic transport providers to deliver infrastructure that supports active travel.” (ATS, 2016, pg. 12)

- 2.3.17. For compliance, this STS will prioritise active travel infrastructure across the Hoo Peninsula, linking new routes and infrastructure on the Site to existing routes and public transport facilities. The relevant guidance in the KCC Transport Plan and Medway Local Plan has been followed

2.4. Local Policy

Emerging Medway Local Plan 2019-2041 (MC, 2024)

- 2.4.1. MC is producing a new LP covering Medway up until 2041. This sets out a vision for future development in the Medway towns and the Hoo Peninsula, ensuring that the needs of the area are met through a number of policies and proposals. This new LP will replace the existing 2003 Local Plan. Hoo Parish Council will continue to make representations at the various stages of the LP’s development.
- 2.4.2. There are various potential impacts of the emerging LP for residents on the Hoo Peninsula, as outlined on Medway Council’s website¹:
- New Community facilities providing social clubs and activities
 - Improved and updated sports facilities in Hoo
 - Improved transport services for better access around the Peninsula and into other areas in Medway
 - Maintaining the local heritage of the Peninsula, including creating access to green spaces for walking and cycling

¹ https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1825/what_the_local_plan_means_for_residents
(last accessed 04/07/2024)

- More options for high quality houses on the Peninsula.

2.4.3. Improving the transport connectivity of Medway is a key opportunity, acting as a catalyst for future local development, growth and improved living standards.

Hoo St Werburgh and Chattenden Neighbourhood Plan (MC, 2023)

2.4.4. The Hoo St Werburgh and Chattenden Neighbourhood Plan (HSW&CNP) aims to provide the necessary framework to achieve sustainable growth in the area, whilst still considering other factors important to the community. One of five Neighbourhood Plans (NP) instigated by MC, all NPs must meet legal requirements set out in national planning legislation. This NP will be in force until the end of 2040.

2.4.5. Paragraph 1.1 states the purpose of the NP:

“The Hoo Neighbourhood Plan provides a positive strategy for growth, but also helps to ensure that such growth is sustainable, against the context of climate change. This plan does not make additional site allocations, but does make provisions for growth in its policies, including for employment, residential and community facilities. At the same time, there are policies on design, environment and transport to ensure that development is sustainable, environmentally, socially, and economically.” (HSW&CNP, 2023, pg. 6)

2.4.6. The planning aims of the Neighbourhood Plan are stated in paragraph 3.2:

“The Vision will be achieved through the following aims and the policies later in the Plan. The planning aims are:

- A. To ensure that development in the parish and in Hoo St Werburgh village and the hamlet of Chattenden is sustainable and retains their distinctive identities and separation.
- B. To ensure that development takes account of climate change and biodiversity.
- C. To maintain or expand the range of community facilities and employment, to create more sustainable work/life patterns and meet the diverse needs of the community.
- D. To ensure that housing development is well-designed, sustainable and meets a range of local needs.
- E. To preserve or enhance the natural and historic environments of Hoo St Werburgh and Chattenden Parish.
- F. To promote sustainable forms of transport and active travel, including cycling and walking.” (HSW&CNP, 2023, pg. 15)

2.4.7. Chapter 8 ‘Travel Infrastructure’ states the aims for the development of Sustainable Transport and increasing incentives to walk by improving pathways in the Hoo. Policy Hoo 11 provides the specific framework for sustainable transport and active travel in Hoo St Werburgh. It states that:

“1. Development that is likely to generate journeys must support a balanced range of transport options, including active travel and sustainable forms of transport, meeting the requirements of this policy proportionate to the scale and nature of the scheme.

2. Parking provision for development should include:

- a. Covered and secure storage for cycles, with electric charging points;
- b. Electric charging points for motor vehicles.

3. Development must be supported by adequate road infrastructure to safely support additional traffic movements, with additional pedestrian crossings where necessary.

4. Development layouts must create a convenient, safe and attractive environment for pedestrians with differing levels of mobility, linking to surrounding paths, community facilities and public transport, and creating good linkages within the site, also meeting the requirements of Policy HOO6.

5. Each new home should include adequate parking provision for the size of property and garages and parking spaces should be adequate to accommodate modern vehicles.

6. New roads should be of sufficient width to allow for easy passage of service vehicles and emergency vehicles and, where appropriate, public transport.” (HSW&CNP, 2023, pg. 66)

Medway Rights of Way Improvement Plan (MC, 2020)

- 2.4.1. The Medway Rights of Way Improvement Plan (ROWIP) is a strategy document that sets out the Council's public rights of way (PROW) and access from 2020 to 2030. Medway currently has a network of 438 paths and 186.1 miles. Most of the PROWs are footpaths, which can only be used by people walking. There are also public bridleways, which can be used by pedestrians, horse riders and cyclists, restricted byways, which can be used by all of the above and horse drawn carriage drivers, and byways open to all traffic, including motor vehicles.
- 2.4.2. PROWs help support the needs of Medway's residents and ensure residents have a high quality of life. PROWs aid active travel as they can link with roadside pavements and cycle lanes in urban areas. Other PROWs leading from towns to the countryside provide ways for people to make longer journeys. The Council is seeking to increase the role of PROWs in delivering strategic active travel routes and connecting new developments to the surrounding network.

Medway Third Local Transport Plan (2011-2026) (MC, 2010)

- 2.4.3. Medway's Local Transport Plan outlines sustainable transport strategies for 2011-2026, aiming to support economic growth through an efficient transport network, improve air quality, and tackle climate change. It focuses on improving public transport, including bus services, and encouraging active travel to reduce reliance on cars especially on local journeys.

Medway Third Local Transport Plan Sustainable Appraisal Report (MC, 2010)

- 2.4.4. This Sustainable Appraisal evaluates the goals of Medway's Third Local Transport Plan. This includes the promotion of active transport, the reduction of traffic-related air pollution, and the mitigation of greenhouse gas emissions through a shift to more sustainable modes of transport alongside traffic management strategies.

Other Emerging Documents

- 2.4.5. MC is in the process of finalising a Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP) for the Medway region. As well as the emerging Local Plan, the outcomes of this report are expected to feed into and complement the emerging BSIP and LCWIP.

2.5. Policy Summary

- 2.5.1. Relevant local, regional and national planning and transport policy has been considered to form the basis for the design of the proposed development on the Hoo Peninsula. KCC and GBC policy, whilst not directly relevant to the planning of the developments on the Hoo Peninsula, provides a wider strategic policy context. In accordance with these principles and MC policy, a vision-based sustainable transport strategy has been developed by PF. This provides MC with the opportunity for aspirational and achievable sustainable employment, living and growth on the Hoo Peninsula.

3. Baseline Transport Conditions

- 3.1.1. This section of the report outlines the existing baseline conditions in the Hoo Peninsula. The current highway network, public transport provision and active travel infrastructure is detailed here.

3.2. Existing Highway Network

3.2.2. Local Routes

A228 (Four Elms Hill / Main Road / Peninsula Way)

- 3.2.1. This is the primary route between the Hoo Peninsula and wider Medway. It is a dual carriageway with two lanes in each direction connecting the Hoo St Werburgh and Chattenden to the northeast with Wainscott and Strood to the south. This is a common route used by HGVs and local buses accessing the Hoo Peninsula.
- 3.2.2. Four Elms Hill is connected to Wulfere Way and Hasted Road at the Four Elms Roundabout. This is an unsignalised roundabout of ICD 80m; it is known to be congested during peak hours.

A228 (Ratcliffe Highway / Sharnal Street / Malmaynes Hall Road / Grain Road)

- 3.2.3. Located to the northeast of Hoo St Werburgh, this is primary local traffic route which connects into Peninsula Way via a roundabout with Ropers Lane and Ratcliffe Highway. At this point, the A228 transitions from a dual carriageway to the west into a single carriageway to the east. During this extent, the A228 has a wide single carriageway with speed limit varying between national and 40mph.
- 3.2.4. A series of roundabouts connect this route with the local villages of Sharnal Street, High Halstow, Fenn Street, Middle Stoke and the Isle of Grain.

A289 (Hasted Road / Wulfere Way)

- 3.2.5. The A289 is located to the south of the Hoo Peninsula at Four Elms Roundabout. It is a dual carriageway of national speed limit with two lanes in each direction. Northeast of Four Elms Roundabout, it connects into the A2 and M2 at M2 J1. Southeast of Four Elms Roundabout, the A289 crosses the River Medway via the Medway Tunnel, linking into Chatham.

3.2.3. Strategic Road Network (SRN)

M2

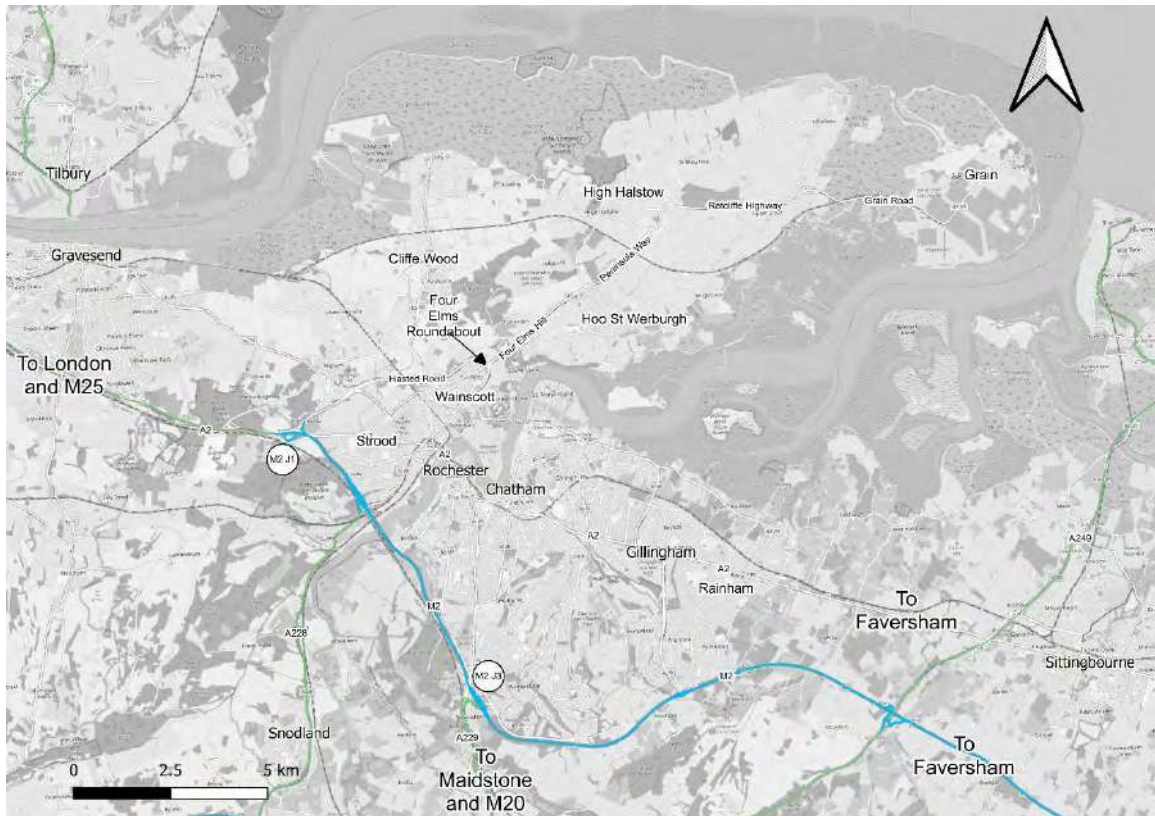
- 3.2.6. The M2 originates 6km to the southwest of the Hoo Peninsula. The M2 is a national route connecting the Medway region southwest to Faversham and Canterbury (via the A2).
- 3.2.7. M2 J3 connects to the A229 at the Taddington Roundabout, which in turn serves Maidstone and leads to the M20 towards Ashford, Folkestone and Dover (via the A20).

A2

The A2 leads northwest bound to Ebbsfleet, Dartford, London and the M25 where it serves as a dual carriageway forming part of the national SRN. To the east, the A2 runs through Strood, Rochester, Chatham and Rainham and is operated by KCC. It is primarily a dual carriageway with two lanes in each direction with stretches of single carriageway with one lane in each direction. The speed limit reduces from 50mph down to 30mph as traffic flows east from the M2 J1 to Chatham. East of Rainham, the A2 is a single carriageway of varied speed limit, leading towards Sittingbourne and Faversham.

- 3.2.8. Figure 3.1 illustrates the local and strategic road network.

Figure 3.1: Highway Network Map



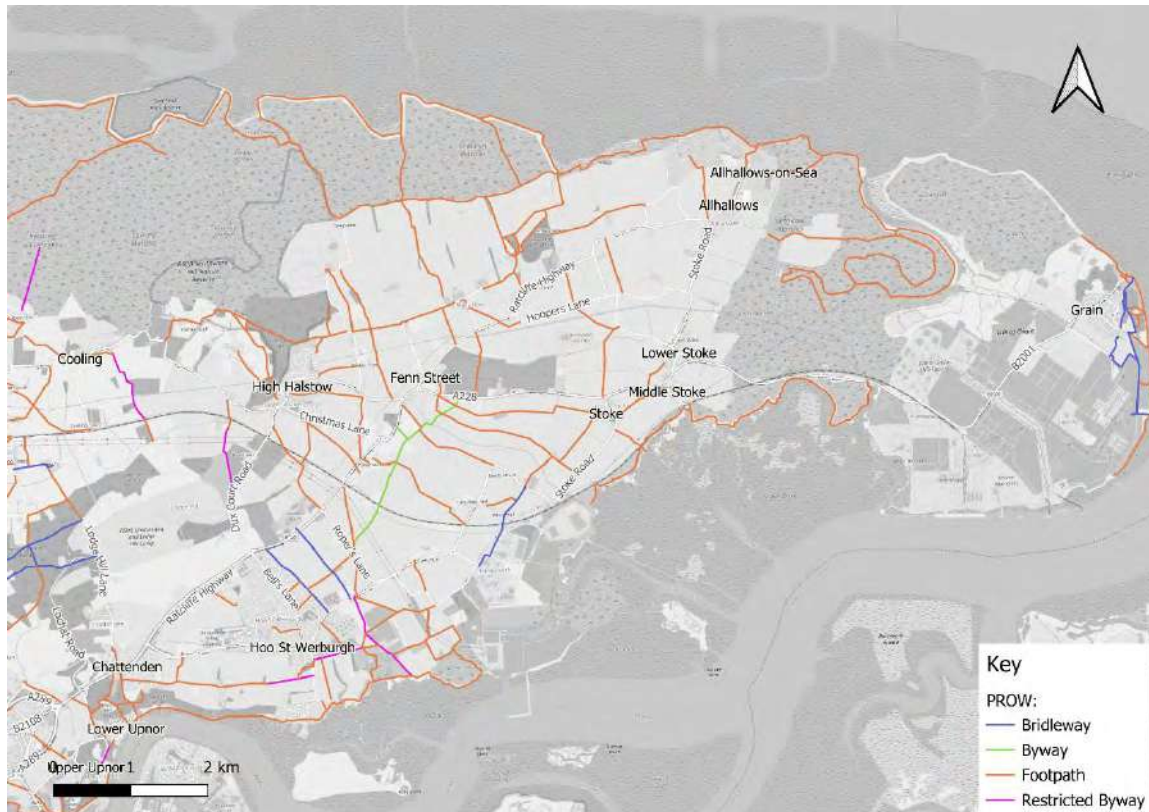
Source: OpenStreetMap contributors with Pell Frischmann annotations

3.3. Active Travel Infrastructure

3.3.4. Public Rights of Way

- 3.3.1. MC's 'Rights of Way Improvement Plan 2020-2030' sets out in objective T2C '*to ensure that the network evolves to meet current and future needs and that connectivity is improved.*'
- 3.3.2. Specifically objective T2C.3 notes the objective to: "*Seek to resolve dead-end routes and provide better connected access, particularly on the Hoo Peninsula*".
- 3.3.3. The wider PROW is fractured in parts due to the previous military land use; as well as the marshes and creeks to the periphery of the Peninsula and industrial installations that have been developed out over the years.
- 3.3.4. The Saxon Shore Way is a coastal walking route running from Gravesend to Hastings and following the line of the coastal path as it was approximately 1,500 years ago. Across the Hoo Peninsula, it runs from Cliffe in the west, continuing north of Cooling and High Halstow before looping south towards Hoo St Werburgh.
- 3.3.5. It runs in a southerly direction past the east of Hoo St Werburgh before connecting to the village of Upnor and eventually down into Rochester. The Saxon Shore Way has an alternative inland route when the high tide prevents walking along the beach.
- 3.3.6. The England Coast Path is a planned National Trail, which follows the coastline of England. At Hoo, it will connect the existing Saxon Shore Way and Kingsnorth Employment Area with the wider coastline in Kent, Essex, London and beyond. This is an action in MC's 'Rights of Way Improvement Plan 2020-2030' It's noted that this is largely a recreational route and not a utility transport route.
- 3.3.7. Figure 3.2 shows the PROW network across the Hoo Peninsula. A network of PROWs is centred around Hoo St Werburgh with additional routes spread throughout the Peninsula.

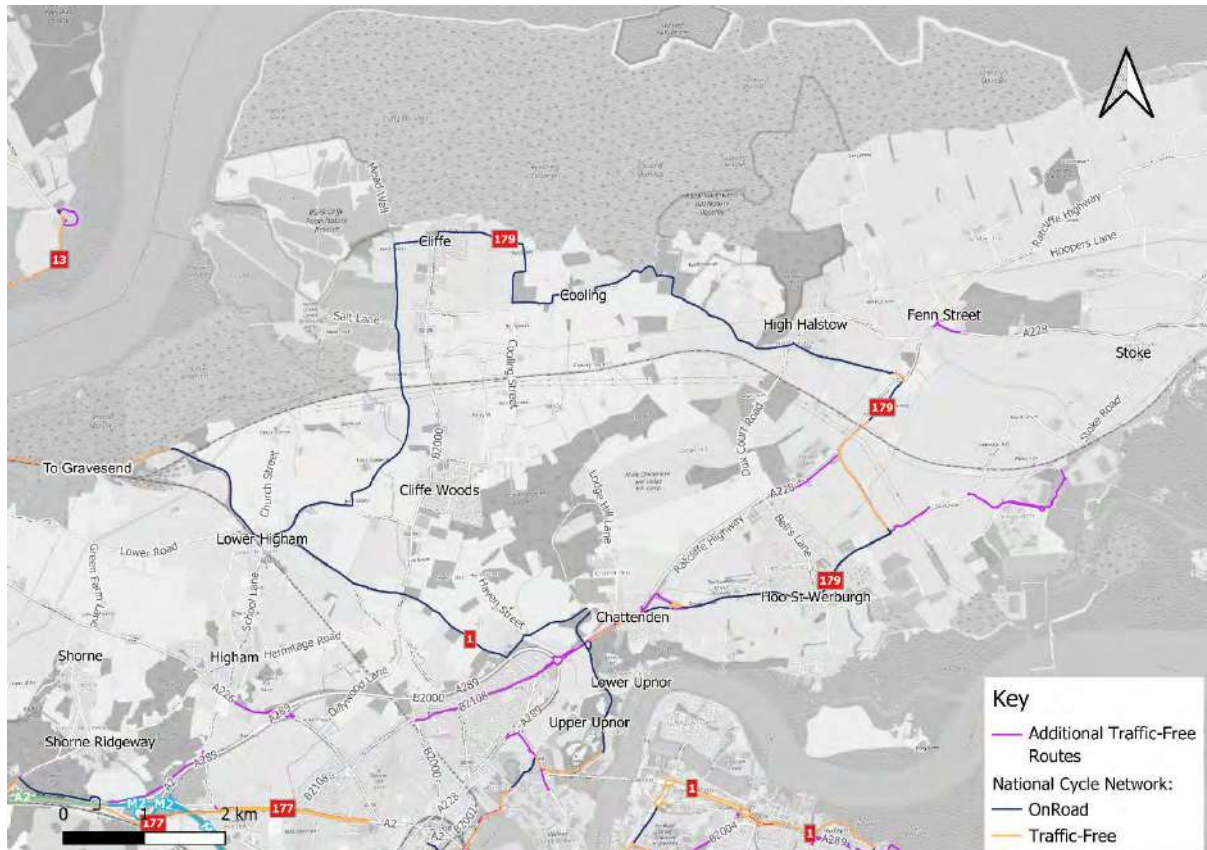
Figure 3.2: Existing PROW Network



3.3.5. Cycling Infrastructure

- 3.3.8. The National Cycle Network (NCN) Route 179 connects Chattenden, Cliffe Woods, Cliffe, High Halstow and Hoo St Werburgh via Ratcliffe Highway and Roper's Lane. NCN Route 1 connects Chattenden with Rochester and Chatham via NCN 178 to the east and to Gravesend via the traffic-free old North Kent Line to the west. The majority of the NCN routes are predominantly on the carriageway along lightly trafficked routes, with stretches of traffic-free sections.
- 3.3.9. There are additional traffic free routes running parallel to the A228 that do not form part of the NCN. Shared walking/cycling routes are located along Ratcliffe Highway, Peninsula Way and Main Road, with wayfinding throughout. Wide shared walking-cycling routes have also recently been constructed at the development at Kingsnorth.
- 3.3.10. Figure 3.3 illustrates the existing cycle network on the Hoo Peninsula.

Figure 3.3: Existing Cycle Infrastructure



Source: OpenStreetMap with Pell Frischmann annotations

3.4. Existing Bus Network

3.4.6. Isle of Grain and Hoo Peninsula

- 3.4.1. Buses in Hoo and Medway are primarily operated by Arriva Kent and Surrey, specifically by subsidiary operator Arriva Medway Towns. It forms part of the Arriva Medway Ticket Zone Boundary. Other operators in the area include Redroute Buses and Nu Venture.
- 3.4.2. Figure 3.4 shows the existing bus network on the Isle of Grain and the Hoo Peninsula, incorporating Lodge Hill, Cliffe, Hoo, Grain and Allhallows.

Figure 3.4: Existing Bus Network - Hoo Peninsula



Source: Medway Council

- 3.4.3. Most services from the Isle of Grain and Hoo Peninsula terminate at Chatham Waterfront Bus Station via Strood and Rochester town centres. Chatham Waterfront Bus Station is a key bus interchange providing direct links to neighbouring key Kent destinations such Maidstone, Gravesend and Ebbsfleet.
- 3.4.4. Table 3.1 shows a summary of routes from the Isle of Grain and the Hoo Peninsula and corresponding frequencies.

Table 3.1: Existing Bus Services from the Isle of Grain and Hoo Peninsula

Service	Operator	Route	Operating Hours	Frequency
191	Arriva Kent & Surrey	Grain – Chatham via Hoo and Rochester	06:30/06:18 – 23:48/18:39 (Hoo/Grain) (Mon-Fri) 07:14/08:05- 23:48/18:30 (Hoo/Grain) (Sat) 09:35-17:55 (Sun)	Up to every 20 minutes (Mon-Fri) Up to every 20 mins (Sat) Every 2 hours (Sun)
133	Arriva Kent & Surrey	Cliffe – Chatham via Frindsbury, Strood and Rochester	06:45-19:10 (Mon-Fri) 08:00-19:10 (Sat) No Sunday service	Hourly (Mon-Fri) Hourly (Sat)
193	Arriva Kent & Surrey	Cliffe – Chatham via Hoo, Chattendham and Rochester	07:39-17:53 Sunday only	Every 2 hours
173/197	Nu Venture	Lodge Hill – Chatham via Findsbury and Strood	07:07-16:28 (Mon-Fri) 09:00-16:34 (Sat) No Sunday service	Up to every hour (Mon-Fri) Up to every 2 hours (Sat)
417	Redroutes Buses	Cliffe – Gravesend via Higham Railway Station	07:24-13:44 (Mon-Fri) 09:24-17:00 (Sat) No Sunday service	3 services daily (Mon-Fri) 3 services daily (Sat)

Source: Arriva, Redroutes Buses and nu-Venture (May 2024)

- 3.4.5. Arriva routes 191, 193 and 133 terminate at Chatham Waterfront Bus Station via Chatham Railway Station and Rochester Railway Station. Redroutes Buses 417 stop at Higham Railway Station and Gravesend Railway Station with no Sunday service. From these locations, local train services are available to key destinations such as London, Ebbsfleet and Margate.
- 3.4.6. All routes shown above are currently capped at £2 single fares. The Discovery bus ticket is also available and compatible with all the operators above and allows unlimited daily travel across West Sussex, East Sussex, East Hampshire, Surrey, Kent and Medway (£10 adult, £20 family up to five per day).
- 3.4.7. Table 3.2 summarises the key destinations directly available by bus from the Hoo Peninsula.

Table 3.2: Hoo Peninsula Bus Services Origin-Destination Summary

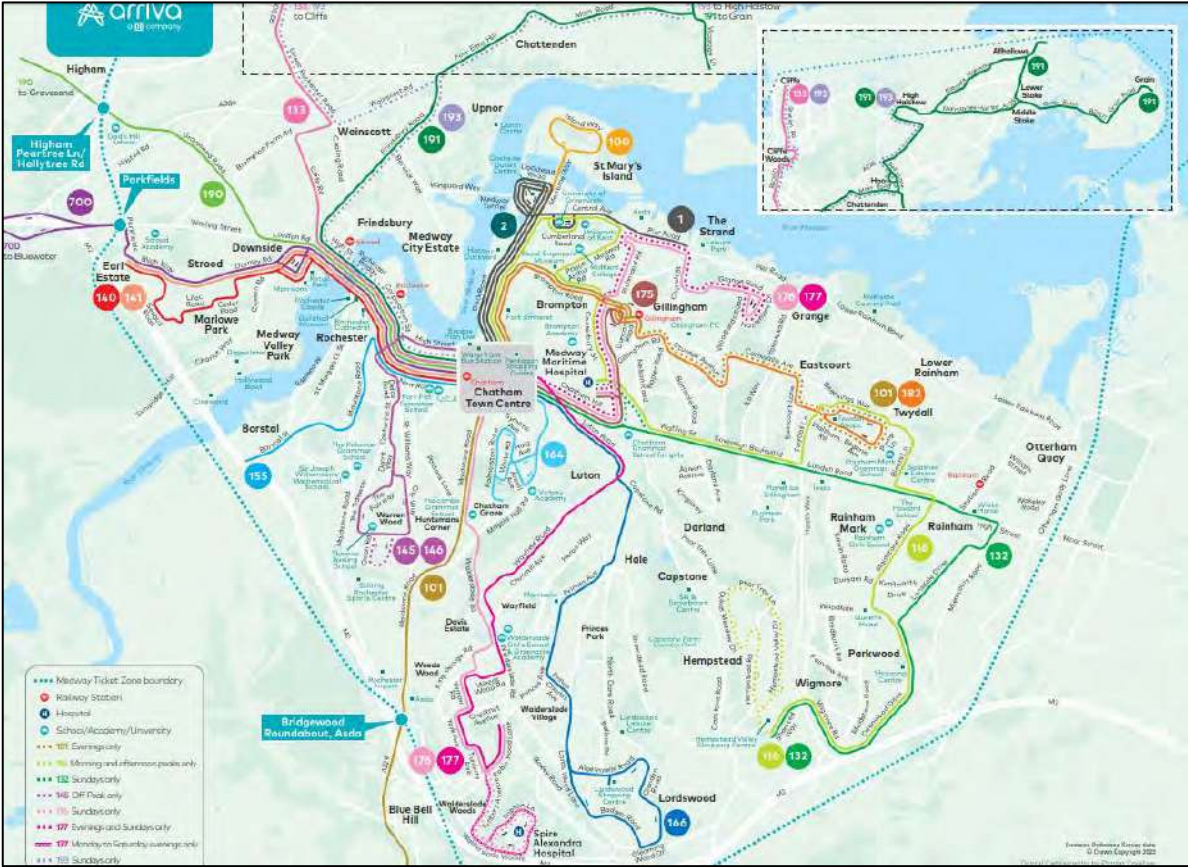
Origin	Destination	Total Number of Services	First/Last Service	Peak Journey Time
Grain	Strood, Rochester and Chatham	12 (Mon-Fri) 11 (Sat) 5 (Sun)	06:18/18:39 (Mon-Fri) 08:05/18:30 (Sat) 08:30/16:50 (Sun)	73 minutes (Strood) 77 minutes (Rochester) 84 minutes (Chatham)
Hoo St Werburgh	Strood, Rochester and Chatham	39 (Mon-Fri) 35 (Sat) 11 (Sun)	06:30/23:48 (Mon-Fri) 07:14/23:48 (Sat) 09:03/17:23 (Sun)	23 minutes (Strood) 27 minutes (Rochester) 35 minutes (Chatham)
Cliffe	Strood, Rochester and Chatham	14 (Mon-Fri) 11 (Sat) 6 (Sun)	06:45/19:10 (Mon-Fri) 08:00/19:10 (Sat) 07:39/17:53 (Sun)	31 minutes (Strood) 35 minutes (Rochester) 41 minutes (Chatham)
Lodge Hill	Strood	9 (Mon-Fri) 9 (Sat) 0 (Sun)	07:07/16:28 (Mon-Fri) 09:00/16:28 (Sat)	27 minutes
Lodge Hill	Rochester and Chatham	8 (Mon-Fri) 6 (Sat) (0) Sunday	07:07/16:28 (Mon-Fri) 09:24/17:00 (Sat) 08:45/18:45 (Sun)	31 minutes (Rochester) 36 minutes (Chatham)
Cliffe	Gravesend and Higham Station	3 (Mon-Fri) 3 (Sat) 0 (Sun)	07:24/13:44 (Mon-Fri) 09:24/17:00 (Sat)	11 mins (Higham) 46 mins (Gravesend)

Source: Traveline (January 2025)

- 3.4.8. In summary, existing local bus services from the Hoo Peninsula and the Isle of Grain connect almost exclusively into the Medway towns only, with an extremely limited alternative service to Gravesend from Grain. Chatham is currently the key travel terminus with local and regional onward connections. Direct, 7-day-a-week bus access to Chatham Railway Station is provided by Arriva, with the Chatham Waterfront Bus Station a key local bus interchange accessible from across the Hoo Peninsula and the Isle of Grain.
- 3.4.9. Alternative public transport hubs directly accessible by bus are Gravesend and Higham Railway Stations (extremely limited weekday service of three daily buses, no Sunday service) and Rochester Railway Station. Hoo St Werburgh has frequent bus access to the Medway towns, but the other local origin points of Lodge Hill, Cliffe and Grain have a markedly reduced service. Lodge Hill is also not accessible by public transport on Sundays, with slightly reduced Saturday services.
- 3.4.7. Medway Region
- 3.4.10. Arriva Kent and Surrey is the primary bus operator in the Medway Region, which captures Chatham, Rochester, Gillingham, Rainham and Strood, as well as the Hoo Peninsula and the Isle of Grain. Figure

3.5 below provides an overview of the primary local and regional routes in Medway operated by Arriva. Nu Venture, Chalkwell Coach Hire and RedRoutes supplement this network with a range of additional local and regional routes.

Figure 3.5: Existing Bus Network - Medway Region (Arriva)



Source: Arriva Kent and Surrey (2024)

3.4.11. Table 3.3 provides a summary of all routes from all bus operators in Medway originating at key local destinations. It can be seen that Chatham and Rochester are the key destinations with the greatest level of public transport accessibility in the Medway region.

Table 3.3: Existing Medway Bus Services

Origin	Key Destinations (Direct Services)	Routes
Strood	Chatham, Grain, Cliffe, Lodge Hill, Rochester, Medway City Estate, Snodland, Cuxton, Wainscott, Hoo, Higham	133, 140, 141, 149, 151, 170, 172, 173, 174, 190, 191, 193, 197
Chatham	Maidstone, Gillingham, Hempstead, Rochester, Cliffe, Gravesend, Bluewater, Strood, King's Hill, West Malling, Snodland, Wainscott, Hoo, Grain, Sittingbourne	1, 2, 100, 101, 102, 113, 116, 120, 121, 132, 133, 135, 140, 141, 142, 145, 146, 149, 151, 155, 156, 164, 166, 169, 170, 172, 173, 174, 175, 176, 177, 179, 182, 185, 190, 191, 193, 197, 326, 327, 700
Rochester	Maidstone, Gillingham, Hempstead, Chatham, Cliffe, Gravesend, Bluewater, Strood, King's Hill, West Malling, Snodland, Wainscott, Hoo, Grain	101, 132, 133, 135, 140, 141, 142, 145, 146, 149, 151, 155, 156, 170, 172, 173, 174, 185, 190, 191, 193, 197, 700
Rainham	Chatham, Hempstead, Maidstone, Sittingbourne, Gillingham,	116, 120, 121, 130, 131, 132, 326, 327, 659, 783, M1
Gillingham	Chatham, Hempstead, Rainham, Maidstone, Sittingbourne,	1, 101, 102, 116, 120, 121, 131, 132, 175, 176, 177, 182, 183, 326, 327, M1

Higham	Chatham, Cliffe, Gravesend, London, Strood, Rochester	111, 133, 190, 193, 311, 417, 736
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Source: Traveline (January 2025)

3.4.12. The National Highway and Transport Public Satisfaction (NHTPS) Survey found that the bus service in Medway was at best average, and substantially below national averages in a number of categories including bus quality and cleanliness of fares. The Medway Bus Service Improvement Plan (2021 – 2026) identified the following bus service categories in which Medway underdelivers nationally, based on the NHTPS survey:

Table 3.4: Medway BSIP Satisfaction

Indicator Number	Satisfaction with:	Medway Satisfaction	National Satisfaction
PTIB07	Bus fares	40%	50%
PTIB04	Whether buses arrive on time	49%	56%
PTIB05	How easy buses are to get on/off	59%	63%
PTIB08	Quality and cleanliness of buses	69%	73%

Source: Medway Bus Service Improvement Plan, Medway Council (2021)

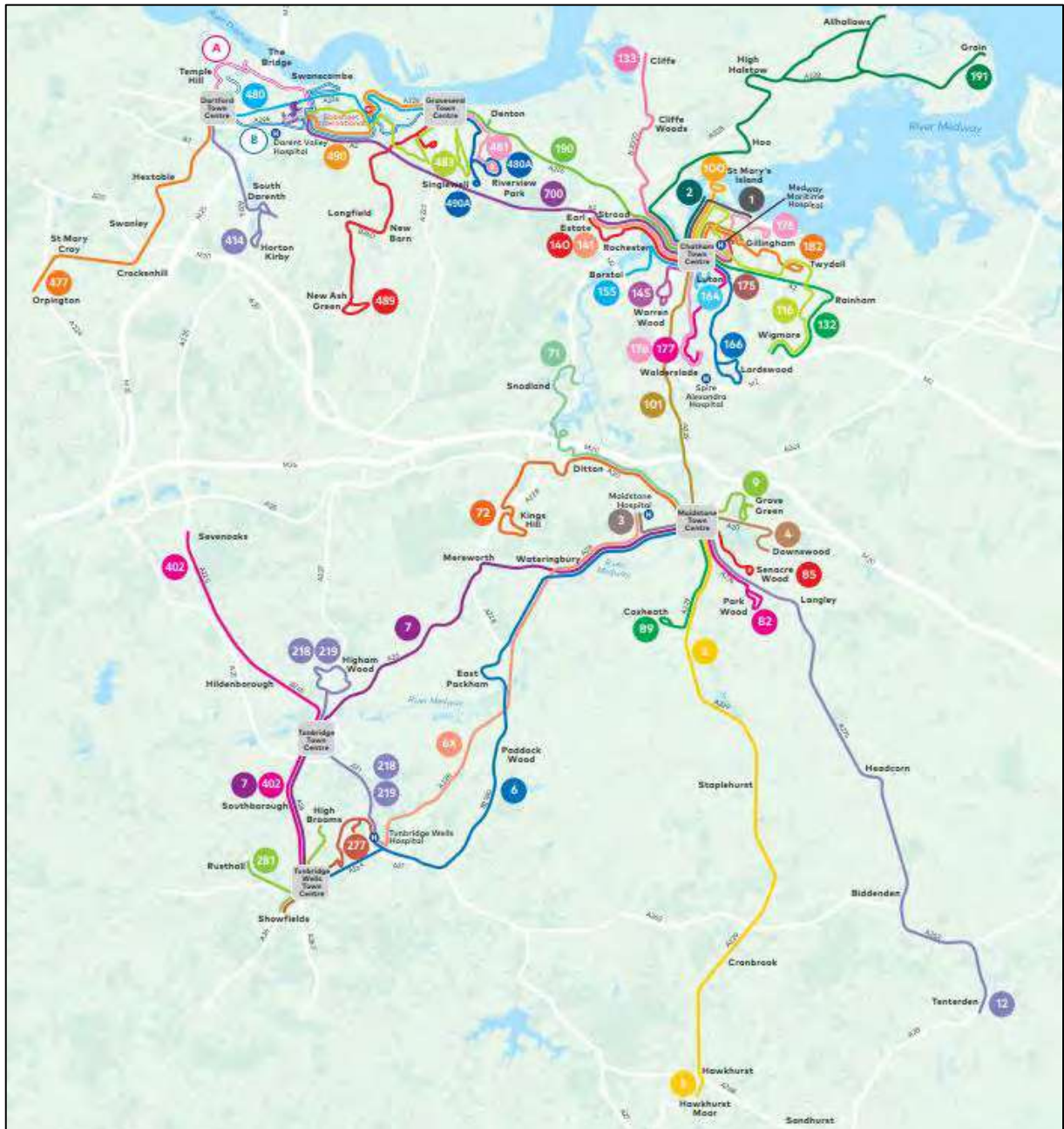
3.4.13. Bus priority lanes provide a fast connection on the A2 between Chatham and Bridgewater Shopping Centre, Ebbsfleet, served by Route 700. Within Medway, there are currently seven bus priority lanes:

- A2 Chatham Hill (Westbound) – 405m
- A2 Chatham Hill (Eastbound) – 437m
- A2 Corporation Street (Westbound) – 212m
- Canal Road Riverside Link (Camera enforced) – 125m
- A2 Rainham Mark Bowaters (Eastbound) – 145m
- A2 Rainham Mark Bowaters (Westbound) – 55m
- Chatham Waterfront Bus Station and Waterfront Way – 522m

3.4.8. Regional Bus Connections

3.4.14. Arriva Kent and Surrey continues to be the primary operator of the bus network in northern Kent, as shown in Figure 3.6. Arriva’s network covers Medway, Gravesend, Dartford, Maidstone, Tonbridge and Tunbridge Wells. Often, these networks operate on a local basis with direct connections between some of these destinations. From Medway, direct connections are available to Maidstone, Gravesend and Dartford; there are no directions routes from Medway to Tonbridge and Tonbridge Wells (change at Maidstone required).

Figure 3.6: Existing Bus Network – North East Kent (Arriva)



Source: Arriva Kent and Surrey (2024)

- 3.4.15. In the wider region, Stagecoach South East is the primary bus operator in southern Kent, covering Canterbury, Margate, Medway, Dover, Folkestone and Tunbridge Wells.

Dartford, Ebbsfleet and Gravesend

- 3.4.16. Dartford, Ebbsfleet and Gravesend are primarily served by the Arriva network. These towns are large employment centres with frequent and reliable onward connections to London by road and rail, including by High Speed 1. Located to the west of the Hoo Peninsula, there currently exists no direct connection between Dartford or Ebbsfleet and the Hoo Peninsula, with the limited 417 route providing an infrequent service from Cliffe to Gravesend.
- 3.4.17. Gravesend is a primary multi-modal transport interchange point. The Gravesend Bus Hub at Barrack Row, opened in 2022, integrates bus and rail facilities, including the half hourly High Speed 1 services to London St Pancras. Bus 190 is the primary route from Medway to Gravesend providing a thrice hourly peak time service from Chatham Waterfront to Gravesend Barrack Row via Rochester Railway

Station and Strood town centre, taking 45 minutes at peak hours. The 417 bus provides an infrequent and limited direct route from the Hoo Peninsula to Gravesend Barrack Row.

- 3.4.18. There is no direct bus connection from Medway to Dartford or Ebbsfleet. Ebbsfleet International Railway Station has direct bus services to Gravesend, Bluewater, Dartford and adjoining suburbs only, operated by Arriva Kent Thameside. Bus 700 provides a twice hourly service between Chatham Waterfront Bus Station to Bluewater Shopping Centre via Rochester Railway Station and Strood town centre.

Maidstone, Tonbridge and Tunbridge Wells

- 3.4.19. Maidstone, Tonbridge and Tunbridge Wells are served by Arriva Kent and Surrey routes with additional Stagecoach routes connecting southward.
- 3.4.20. Maidstone is connected directly from Medway by the 101 Maidstone to Gillingham bus service via Chatham and Rochester. This service runs every 12 minutes, taking 31 minutes (from Chatham) and 43 minutes (from Medway). At Maidstone there are frequent onward connections to Tunbridge Wells and Tonbridge via bus routes 6 (hourly), 6X (every 45 minutes) and 7 (every 30 minutes). There are no direct connections from the Hoo Peninsula to Maidstone.

Discovery Bus Ticket

- 3.4.21. The Discovery bus ticket is a bus-only integrated ticketing service providing extensive daily travel across the South East including areas within Kent, East Sussex, West Sussex and East Hampshire. The daily ticket is cross-compatible with a total of 31 bus operators in the region, including:
- Arriva Surrey, East Sussex and West Sussex, Kent & Medway
 - ASD Transport
 - Brighton & Hove
 - Compass Travel
 - Cuckmere Buses
 - Diamond Bus South East
 - Eastbourne Coachways Ltd
 - Emswoth
 - Metrobus
 - Nu-Venture Coaches
 - RedRoute Buses
 - Stagecoach South East
- 3.4.22. Whilst some services or operators are excluded from this ticket, such as Winchester and Guildford Park & Rides, KCC and Medway contracted local bus services are required to accept this ticket.
- 3.4.23. The current fare structure is outlined in Table 3.5.

Table 3.5: Discovery Ticket Pricing (2024)

Category	Daily Price
Adult	£10.00
Child	£8.00
Family (up to five, one/two adults required)	£20.00

Source: Metrobus (January 2025)

3.4.9. Fastrack Services

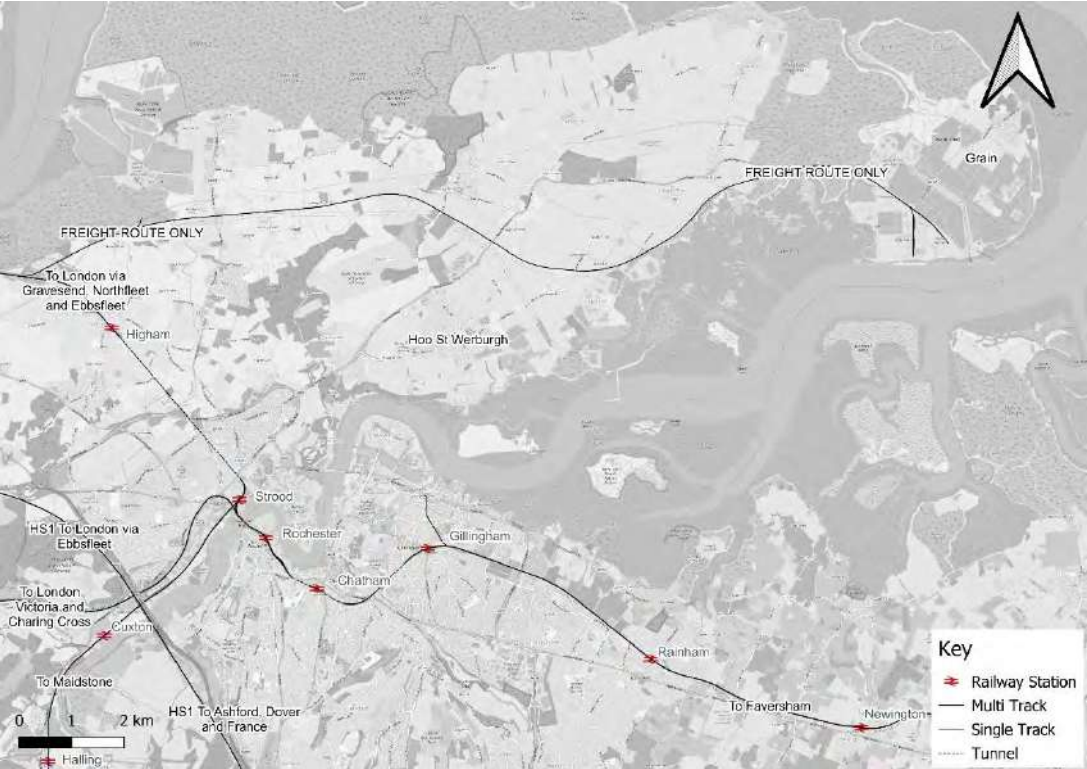
- 3.4.24. Fastrack is Kent's Bus Rapid Transit (BRT) system, designed to provide fast, reliable, and affordable public transport across the region. It operates in two primary areas: Kent Thameside (Ebbsfleet, Gravesend, Dartford and Bluewater) and Dover. Fastrack consists of dedicated bus lanes, bus priority

signals, regular and predictable services, low-emission bus fleet, level boarding, real-time passenger information, high quality bus stops and shelters and recognisable branding.

3.5. Existing Rail Network

3.5.1. There are no passenger rail services or stations on the Hoo Peninsula. One single track freight line runs through the Peninsula from Medway to the Isle of Grain; a previous study concluded that this line is not suitable for realising the development on the Hoo Peninsula due to the limited future capacity of this line compared to the scale of proposed development. A variety of stations with a range of local and regional services are accessible within 10km of the Hoo Peninsula, as summarised in Figure 3.7 and throughout this chapter.

Figure 3.7: Local Rail Network



Source: OpenStreetMap contributors with Pell Frischmann annotations

3.5.10.Strood Railway Station

- 3.5.2. Located 7km from Hoo St Werburgh, Strood Railway Station is accessible by public transport in 29 minutes via the 191-bus route from Five Bells to Station Road/Frindbury Road.
- 3.5.3. 112 car parking spaces (three accessible) and 40 sheltered cycling spaces are located here.
- 3.5.4. There is a direct connection to Stratford International and London St Pancras (33-minute journey) primarily on HS1, with alternative slower services to London Bridge, London Blackfriars and Farringdon also available on Southeastern and Thameslink services. Outside of Greater London, additional destinations include Maidstone, Paddock Wood and Faversham. A summary of services is provided in Table 3.6.

Table 3.6: Summary of direct railway services from Strood

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
London St Pancras	33 minutes	Two per hour	Hourly	Hourly
Luton via				
London Bridge	1 hour 10 minutes	Two per hour	Two per hour	Two per hour
London Blackfriars	1 hour 17 minutes			

London St Pancras	1 Hour 26 minutes			
Ramsgate	1 hour 17 minutes	Hourly	Hourly	Hourly
Paddock Wood	47 minutes	Two per hour	Two per hour	Hourly
Faversham	33 minutes	Two per hour	Hourly	Hourly

Source: National Rail Enquiries (July 2024)

3.5.11.Ebbsfleet International Station

- 3.5.5. Ebbsfleet International Station is not easily accessible from the Hoo Peninsula, or from the Medway region, by existing bus services. Bus services connect Ebbsfleet International to the Bluewater shopping centre on the edge of Ebbsfleet, which in turn is accessed from Medway via the express 700 bus route; there is no direct bus connection between Ebbsfleet International and the Medway region.
- 3.5.6. Facilities available at this station include 4,945 car parking spaces (84 accessible spaces) spread across four car parks. 44 cyclist spaces and car hire facilities are also provided.
- 3.5.7. Ebbsfleet International Station is located on HS1, with direct high-speed access to Stratford International (11 minutes) and to London St Pancras (18 minutes), as well as south to Medway International (19 minutes). Alternative destinations include Ramsgate, Faversham and Margate.

Table 3.7: Summary of direct railway services from Ebbsfleet International Station

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
London St Pancras	18 minutes	Four per hour	Three per hour	Three per hour
Sandwich	1 hour 14 minutes	Two per hour	Hourly	Hourly
Ramsgate	58 minutes – 1 hour 32 minutes	Three per hour	Three per hour	Three per hour
Faversham	48 minutes	Two per hour	Hourly	Hourly
Margate	1 hour 20 minutes	Two per hour	Two per hour	Two per hour

Source: National Rail Enquiries (July 2024)

3.5.12.Gravesend Railway Station

- 3.5.8. Gravesend Railway Station is situated in the heart of Gravesend town centre, adjacent to the Gravesend Bus Hub. It is accessible from the Medway towns via the 190-bus route, taking up to 53 minutes from Chatham town centre. Highly infrequent weekday and Saturday services are also available from Cliffe to Gravesend Bus Hub on the 417 (operated by Redroutes Buses).
- 3.5.9. Gravesend Station has 94 car parking spaces (5 accessible spaces) and 280 sheltered cycling spaces.
- 3.5.10. A direct service primarily using HS1 is available from Gravesend Railway Station to Stratford International and London St Pancras (23 minutes). Additional slower stopping services are available to London Bridge, London Blackfriars (Thameslink) and London Victoria (Southeastern). Alternative destinations include the Medway towns, Ramsgate and Faversham. A summary of direct services is shown in Table 3.8.

Table 3.8: Summary of direct railway services from Gravesend Railway Station

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
London St Pancras	23 minutes	Two per hour	Two per hour	Two per hour
Luton via		Two per hour	Two per hour	Two per hour
London Bridge	57 minutes			
London Blackfriars	1 hour 4 minutes			
London St Pancras	1 hour 13 minutes			
London Charing Cross via	1 hour 1 minute	Two per hour	Two per hour	Two per hour
London Bridge	53 minutes			

London Victoria	1 hour 5 minutes	Two per hour	Does not run	Does not run
Ramsgate	1 hour 27 minutes	Hourly	Hourly	Hourly
Faversham	46 minutes	Hourly	Hourly	Hourly
	43 minutes	Hourly	Does not run	Does not run

Source: National Rail Enquiries (July 2024)

3.5.13.Northfleet Railway Station

- 3.5.11. Northfleet Station is located adjacent to Ebbsfleet International, with limited existing connectivity to Medway. Bus services connect Northfleet via Ebbsfleet International to the Bluewater shopping centre on the edge of Ebbsfleet, which in turn is accessed from Medway via the express 700 bus route. High speed services are not accessible from Northfleet Station.
- 3.5.12. Northfleet Station has access to a wide variety of London stations via stopping services only, with Thameslink services to Luton (via London Bridge (54 minutes), London Blackfriars (61 minutes), London St Pancras (70 minutes) and Southeastern services to London Charing Cross and London Cannon Street (both via London Bridge).
- 3.5.13. There are no parking facilities at Northfleet Station. It is likely that users of this station park at one of the four car parks at the adjacent Ebbsfleet International Station.

Table 3.9: Summary of direct railway services from Northfleet Railway Station

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
Luton via		Two per hour	Two per hour	Two per hour
London Bridge	54 minutes			
London Blackfriars	1 hour 1 minutes			
London St Pancras	1 hour 10 minutes			
London Cannon Street via	1 hour 3 minutes	Daily	Does not run	Does not run
London Bridge	59 minutes			
London Charing Cross via	56 minutes	Two per hour	Two per hour	Two per hour
London Bridge	48 minutes			
Gravesend	5 minutes	Four per hour	Two per hour	Two per hour
Rainham (Kent)	33 minutes	Two per hour	Two per hour	Two per hour

Source: National Rail Enquiries (July 2024)

3.5.14.Rochester Railway Station

- 3.5.14. Rochester Railway Station is accessible from the Hoo Peninsula by public transport via the 191-bus route from Five Bells to the Railway Station (Stop D), taking 30 minutes. This is a frequent service operating every 20 minutes at peak times.
- 3.5.15. Additional facilities include 110 car parking spaces and 19 sheltered cycling spaces.
- 3.5.16. There is a direct connection to Stratford International and London St Pancras (33-minute journey) primarily on HS1, with alternative slower services to London Bridge and London Blackfriars (Thameslink) and to London Victoria (Southeastern) also available. There are also frequent

connections to Strood, Chatham and the other Medway towns via the Faversham line. A summary of services is provided in Table 3.10.

Table 3.10: Summary of direct railway services from Rochester Station

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
London St Pancras	33 minutes	Two per hour	Hourly	Hourly
Luton via				
London Bridge	1 hour 14 minutes	Two per hour	Two per hour	Two per hour
London Blackfriars	1 hour 20 minutes	Two per hour	Two per hour	Two per hour
London St Pancras	1 Hour 29 minutes	Two per hour	Two per hour	Two per hour
Ramsgate	1 hour 15 minutes	Two per hour	Two per hour	Two per hour
London Victoria	45 minutes	Two per hour	Two per hour	Does not run
	1 hour 7 minutes	Two per hour	Hourly	
Dover Priory	1 hour 16 minutes	Hourly	Hourly	Hourly
Faversham	32 minutes	Four per hour	Two per hour	Three per hour

Source: National Rail Enquiries (July 2024)

3.5.15.Higham Railway Station

- 3.5.17. High speed services are not accessible from Higham Station; a regular Thameslink service to Luton (via London Bridge (65 minutes), London Blackfriars (72 minutes) and London St Pancras (81 minutes)) and daily Southeastern service to London Charing Cross (via London Bridge) providing the only direct services to London.
- 3.5.18. Facilities at Higham Railway Station include 90 car parking spaces (5 accessible spaces) and 14 cycle spaces.

Table 3.11: Summary of direct railway services from Higham Station

Destination	Journey Times	Peak Hour One-Way Frequency		
		Monday – Friday	Saturday	Sunday
Luton via		Two per hour	Two per hour	Two per hour
London Bridge	1 hour 5 minutes			
London Blackfriars	1 hour 12 minutes			
London St Pancras	1 hour 21 minutes			
London Charing Cross via	1 hour 11 minutes	Twice daily	Does not run	Does not run
London Bridge	59 minutes			
Gravesend	7 minutes	Two per hour	Two per hour	Two per hour
Rainham (Kent)	22 minutes	Two per hour	Two per hour	Two per hour

Source: National Rail Enquiries (July 2024)

- 3.5.19. In summary, a range of local and regional services are accessible within the Medway region. A variety of London stations are accessible on Thameslink, HS1 and traditional services. Strood Station is the closest station to the Hoo Peninsula and is likely to be the station most used by future residents and employees on the Hoo Peninsula due to the variety of services accessible (including high speed services to London), existing infrastructure and the proximity to the Hoo Peninsula.

3.6. Emerging Transport Improvements

- 3.6.1. The Kent Bus Service Improvement Plan (Kent BSIP) aims to strategically improve the bus provision in Kent in line with requirements of the National Bus Strategy. In order to deliver the strategies outlined in

this BSIP, enhanced partnerships have been established across Kent (excluding Medway). Additional delivery initiatives include:

- NDI 1: KCC to secure funding and prioritise its use to support services that have become unsustainable at reduced passenger levels until such time as other National Bus Strategy initiatives drive growth.
- NDI 2: KCC and Kent's bus operators will deliver a range of Year 1 service initiatives based on feedback gathered through engagement activity with operators, stakeholders and the general public. Initiatives will be prioritised based on evaluation criteria which takes into account factors such as network gap analysis (e.g. accessibility to town centres, sustainability, value for money and deliverability)
- NDI 3: KCC and Kent's bus operators will deliver a range of Year 2 and 3 service initiatives which address areas with poorer accessibility levels identified through our Network Gap Analysis. In these areas more detailed analysis will be undertaken which will consider changes to the commercial and subsidised bus network, taking account of over and underserved corridors, the use of DRT and other alternative solutions and the Total Transport Concept, including the relationship with other layers of transport provision such as home to school and patient transport services.
- NDI 4: KCC and Kent's bus operators will seek to increase the proportion of the population within the 15, 30 and 45-minute catchment of the closest defined town centre for their district by improving corridor performance, service levels, speed and integration, including during off-peak hours.
- NDI 5: KCC will review its criteria for the support of council-funded socially necessary bus services to ensure it continues to reflect the travel needs of the community and is in line with the changing requirements of the NBS.
- NDI 6: KCC and Kent's district councils will produce a Memorandum of Understanding (MOU), to ensure that improvements to bus services are fully considered and delivered with consideration of new planning developments.

3.6.2. Strood Interchange is a proposed enhanced integration of Medway local bus network and National Rail services, instigated by Transport for the South East. Additional changes to the station and platform layout in order to facilitate a change in rail services, as well as changes to the public realm to increase bus accessibility are being investigated. It is currently being progressed with at the feasibility stage.

3.6.3. The Lower Thames Crossing (LTC) is a proposed crossing of the River Thames, connecting Essex to the north with Kent to the south. The planned route is expected to run from the M25 near North Ockendon (south of J29), cross the A13 at Orsett before crossing under the Thames east of Tilbury and Gravesend. A new link road will then take traffic to the A2 near Shorne, close to where the route becomes the M2 in Kent.

3.6.4. This crossing will be delivered by National Highways. In March 2025, the Secretary of State for Transport granted a Development Consent Order (DCO) for the LTC, following the submission of a Recommendation Report in March 2024.

3.7. Baseline Conditions Summary

3.7.1. Existing highway, public transport and active travel infrastructure has been outlined on the Hoo Peninsula and across the wider Medway region.

3.7.2. The A228 is the primary traffic route on the Hoo Peninsula, connecting into the M2 and the A2 via the A289. Four Elms Roundabout, at the southern tip of the Hoo Peninsula, connects the A289 and the A228 and is commonly known to be a point of congestion in both the AM and PM network peaks.

3.7.3. An extensive PROW network is located across the Hoo Peninsula, primarily consisting of footpaths. NCN and other traffic-free cycle routes are located in the western portion of the Hoo Peninsula. NCN routes on the Peninsula are predominantly on-carriageway, lightly trafficked routes; traffic-free routes are provided adjacent to busier routes along the A228. Hoo St Werburgh is connected to the wider Medway region by NCN Route 179; however, cycle connections further east towards Grain are limited.

- 3.7.4. There is a range of Network Rail stations located across Medway, but there are none on the Hoo Peninsula. The closest rail station to the Hoo Peninsula – Strood Station – is served by a variety of high speed and regular train services and is currently accessible from the Hoo Peninsula by Arriva bus 191. A feasibility study into the expansion of Strood Station, with public realm changes and greater integration with bus services, is being undertaken at the time of writing.

4. Place-Based Vision for the Hoo Peninsula

- 4.1.1. As outlined in the latest update to the NPPF, a vision-led approach is fundamental to the promotion of sustainable development. Traffic, and in particular peak commuter traffic, has historically been the main focus for transport planning assessments. Forecasts were made relating to the number of vehicle trips expected to be generated by a new development, which were then assessed using traffic models, which in turn dictated the level of highway mitigation required. The outcome of this form of transport planning was the design of bigger junctions and roads to enable convenient private travel by car. This approach was commonly referred to as 'Predict and Provide'.
- 4.1.2. However, evidence and experience has led us to the understanding that traffic is a function of the available road space, and that the more highway capacity is created, the more traffic increases to fill the available road space. With the emergence of the climate crisis and a presumption against reliance on private cars, a new methodology has been adopted to replace 'Predict and Provide'.
- 4.1.3. This updated methodology is designed to accelerate the delivery of active and sustainable travel and is termed a 'Vision and Validate' approach to transport planning. This is a tested approach in planning, with the concept adopted by National Highways and other Local Authorities.
- 4.1.4. This chapter of the TN summarises and explains the core vision, strategic aims and visioning principles which underpin the sustainable transport strategy for the Hoo Peninsula.

THE CORE VISION

Achieve economically prosperous and inclusive low-carbon development on the Hoo Peninsula by integrating sustainable, active, and public transport into new developments. This people-focused, modern approach shifts away from traditional, vehicle-centric urban design, prioritising people at the top of the street user hierarchy.

4.2. Strategic Transport Objectives

- 4.2.1. The core vision for sustainable development across the Hoo Peninsula is outlined above. In order to realise this vision, the following strategic transport objectives are outlined:
- Promote healthy lifestyles through the provision of high quality integrated active travel infrastructure which is accessible to the widest possible range of users and prioritises people over vehicle movement.
 - Reduce emissions by providing for existing and future trips to be undertaken by walking, cycling and on high frequency public transport routes to a range of destinations, reducing the need to use a car.
 - Make more efficient use of existing and new infrastructure, avoiding the need to build environmentally harmful and costly new roads, ensuring resource-efficient sustainable growth for Medway.
 - Provide a range of credible and realistic alternatives to private car use for a range of integrated journeys to a range of destinations, available when and where people want to travel, with convenient, quick and easy interchange opportunities between modes accessible at prominently located mobility hubs in the heart of neighbourhoods.
 - Design new self-sufficient communities in which people are proud to live, and which provide for day-to-day needs within 15-minutes of their home, with neighbourhoods centred around multi-modal mobility hubs which provide direct links to key destinations.

4.3. Sustainable Transport Principles

4.3.1. The strategic transport objectives outlined above can only be achieved through the integration of sustainable principles embedded at each phase of planning, construction, occupation and beyond. The strategic transport objectives are shaped through the following fundamental principles:

- A street user hierarchy that prioritises active travel;
- High level of accessibility to goods and services;
- Access to high quality public transport
- Self-sufficient place making;
- Suitable connectivity into the wider area;
- Future-proofing developments with incorporated micromobility – ‘Last mile journeys’; and
- Innovative strategies to tackle refuse, delivery and servicing vehicles – ‘Last mile deliveries’.

4.3.2. These sustainable transport principles will assist sites in achieving the trip and modal split targets prescribed in this document and ensure sufficient capacity is provided across public transport, walking and cycling infrastructure to cater for the predicted level of non-vehicle trips across the Hoo Peninsula. These underlying philosophies are to be embedded within an area wide travel plan, with site specific travel plans expected to sign up to, and where possible exceed, these minimum requirements.

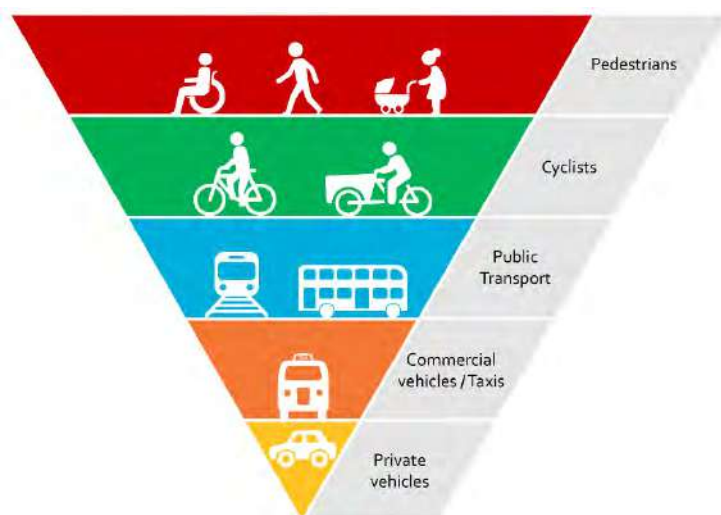
4.3.2. Street User Hierarchy

4.3.3. Motor vehicles detract from the local environment through noise, pollution and a perception of safety on streets. In order to ensure that people can safely access facilities within a 20-minute walk of their house, other forms of transport need to be encouraged over and above motor vehicles.

4.3.4. Development proposals should adhere to the prioritisation of pedestrians, cyclists and public transport. Streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

4.3.5. Almost all journeys start and end on foot and therefore the pedestrian should be the focus of street design. The design of streets should prioritise users in the order illustrated below:

Figure 4.1: Street User Hierarchy



Source: Surrey Design Code – Create Streets

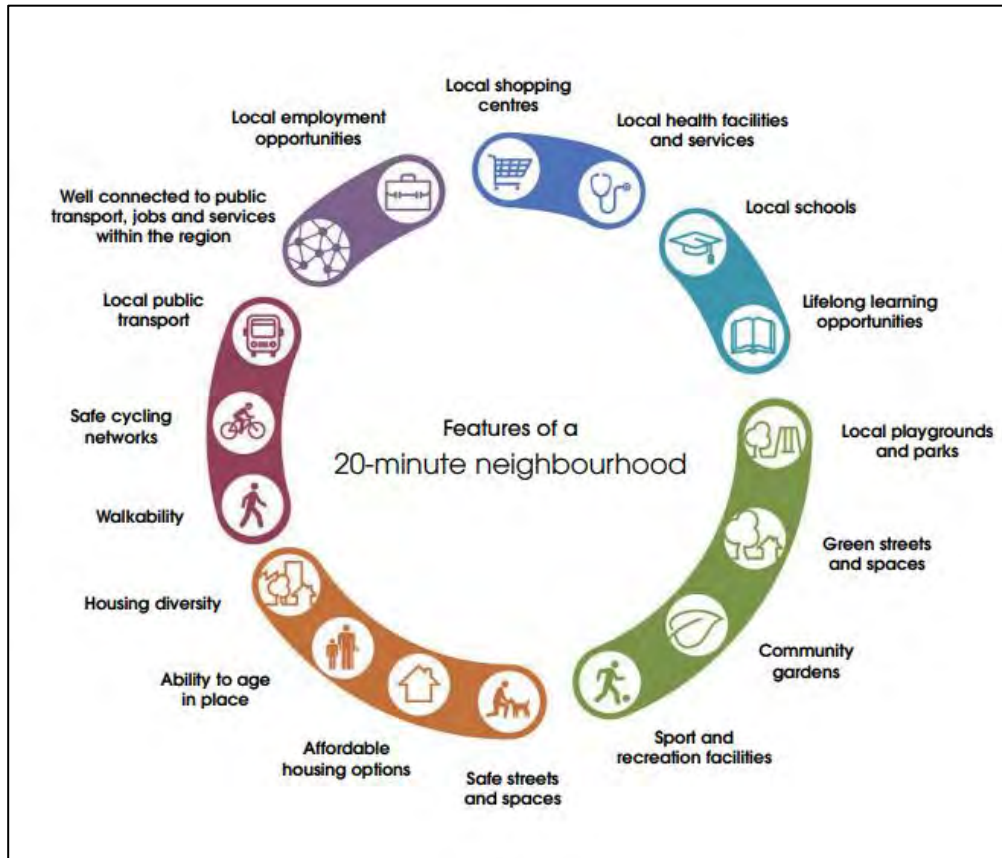
4.3.6. A development, depending on its scale and the context, will require a range of streets and spaces with differing characteristics. Planning applications require a Design and Access Statement to be submitted and this should show how street design has been considered in the context of user hierarchy.

- 4.3.7. Site Transport Assessments, Travel Plans and Design and Access Statement should be informed by best practice guidance, such as Local Transport Note 1/20 (Cycling Infrastructure Design) and CIHT's 'Streets and Transport in the Urban Environment' series.
- 4.3.8. In addition, Active Travel England guidance promotes active travel through the design and layout of the built environment.
- 4.3.9. The proposed developments should be designed in accordance with a healthy streets approach to prioritise active modes of transport, such as walking and cycling. Streets within the proposed developments will provide cycle lanes, cycle paths, mixed pedestrian and cycle routes or shared surfaces. Any street that is not a shared surface should provide safe pedestrian routes.
- 4.3.10. To ensure that people not cars are prioritised in developments, the street hierarchy should consider:
- The design of streets to low vehicle speeds, with areas of 20mph being the preferred starting point.
 - High-quality provision for walking and cycling is required to ensure these remain the main choice of travel mode.
 - Space efficient car parking could be provided in 'car barns' so that residents and workers who need to occasionally use cars can access private or shared cars.
- 4.3.11. Primary routes throughout the proposed developments should provide the main vehicular routes and, alongside secondary streets, will where possible:
- Include high quality segregated paths and cycle paths for all non-vehicular users, including micro-mobility;
 - Provide access to public transport services;
 - Have key destinations / facilities located in close proximity; and
 - Give priority to active sustainable modes at and across junctions using primary streets and side roads.
- 4.3.12. Tertiary streets will be designed to:
- Provide access to the wider area for essential emergency vehicles, as well as servicing commercial, community and residential properties, off-plot car parking in car barns (including car-pool hire schemes) and to provide access for people with mobility issues. These will be designed to:
 - Provide full permeability and priority for active sustainable modes.
 - No through routes for non-essential traffic, with filtered permeability to enable access for essential vehicles.
 - Public realm designed for low traffic volumes and speeds below 20 mph.
 - Any loading bays, drop-off/pick-up points and vehicle parking for people with mobility issues, will be integrated into the public realm. Innovative solutions will be considered to 'manage the kerb'.

4.3.3. Accessibility to Goods and Services

- 4.3.13. *Planning for Walking* (March 2015) notes that 80% of journeys shorter than 1 mile (or approximately 20-minute journey time) are on foot. The journey time quoted above ties in with the concept of the '15-minute city' or '20-minute neighbourhood'.
- 4.3.14. The '15-minute city' or '20-minute neighbourhood' concept enables people to 'live local'. This means people can meet most of their everyday needs within a 15–20-minute walk or cycle from their home, such as schools, grocery shopping and places to socialise and exercise.
- 4.3.15. Ensuring that new developments adhere to the 20-minute Neighbourhood requires this philosophy to be embedded into new masterplans for areas of growth, which identify any gaps in key services or amenities that are required to achieve the standard. The hallmarks of a 20-minute neighbourhood outlined in Plan Melbourne 2017-2050 is shown below as an example.

Figure 4.2: Features of a 20-minute Neighbourhood



Source: TCPADepartment of Environment, Land, Water and Planning, Victoria State Government

4.3.4. Self-Sufficient Place-Making

- 4.3.16. The geography of the Hoo Peninsula and its position in relation to the River Medway means that development in on the Hoo Peninsula can be contained and its impact on the wider road network minimised, if the ambitions for sustainable development can be achieved. The full scale of growth is considered to form a critical mass in supporting local services and facilities, along with an improved public transport and active travel offer. This negates the need for residents to travel off the Hoo Peninsula for work and leisure, instead bringing the services to within easy access of both new and existing residents.
- 4.3.17. Accessibility will be a key element in the design and planning of new housing, with an aspiration to incorporate all key services to be within 20 minutes walking / cycling distance. In line with guidance set out in '*Buses in Urban Developments*' published by CIHT in January 2018, transport nodes such as bus stops should be located within a 3-6-minute walk time depending on service type.
- 4.3.18. Infrastructure improvements and sustainable measures will need to be considered for all future developments to enhance connectivity through the principle of walkable neighbourhoods and healthy towns. Measures will also be included to reduce the need to travel through embracing technology. Approaches to internalise and reduced motor vehicle use within and between development which should be considered include:
- Digital infrastructure (journey planning applications for mobile phones).
 - Online information for journey planning.
 - Installation of high-speed internet to allow working from home.
 - Mobility as a service (Maas).
 - Micromobility.
 - Real time bus information.

- Demand responsive transport and ride sharing.
- Smart / mobile ticketing.
- Electric Car Clubs.
- Last mile deliveries and Amazon lockers (or similar).
- Future proofing for technological improvements (e.g. autonomous vehicles).

4.3.19. These measures would aim to make sustainable travel possible for everyone, particularly on a localised basis. Discouraging the use of cars by providing sustainable and more attractive alternatives to car travel is key.

4.3.5. Micromobility and Cycle Parking – ‘Last Mile’ Journeys

4.3.20. In 2022, 26% of trips nationally were less than 1 mile (DfT, 2023). E-scooters provide an alternative for first and last mile travel and provide a great alternative to ride hailing, as 40% of ride-hailing trips are currently for distances below four kilometres.

4.3.21. To reflect the planned low car usage, the sites will need to consider how to encourage and accommodate cycling. Providing appropriate cycle parking and cycle infrastructure to meet the needs of development will be fundamental to delivering the sustainable transport principles of the area. Each site should consider the following:

- Providing cycle parking infrastructure that is convenient to new and adjacent residential and business communities that is flexible, safe, secure and integral to the public realm.
- Providing covered and secure long stay cycle parking.
- Providing innovative solutions to cycle parking infrastructure.
- Integration between housing, destinations and mobility hubs.
- Accommodating non-standard cycles and provision for electric charging points.

4.3.22. All proposed developments on the Hoo Peninsula will consider cycle parking at the master planning stage to ensure it is conveniently located and integrated into the development as well as the public realm. The use of a mobility hub will be explored to integrate cycle-rail trips and enhance the interchange potential.

4.3.6. Deliveries, Refuse Strategy and Servicing – ‘Last Mile’ Deliveries

4.3.23. To reduce commercial or residential delivery trips, the following ‘last mile’ concepts could be explored:

- Site delivery hubs to enable consolidation of deliveries.
- Last-mile deliveries to be provided by sustainable modes (such as cargo bikes) and bulkier items to use electric vehicles within sites
- Innovative solutions and technology to be considered to further reduce the number of delivery trips and manage onward ‘last-mile’ deliveries.

4.3.24. As a recent example, a ‘last mile’ logistics hub has been opened in central London using an area of an underused car park (39 car parking spaces). Operated by Amazon parcel deliveries are conducted via pedestrian porters (i.e. on foot) or e-cargo bikes to all residents within a 2 kilometre radius. This will take a projected 85 vehicles off the road daily, equating to 23,000 vehicle journeys annually.

4.3.25. A delivery hub would fit in with the surrounding employment sites which have links to logistics. Common features of delivery hubs include:

- Internal storage of goods;
- External storage of goods;
- Short- & long-term storage options;
- Provide a variety of solutions for transferring ‘last mile’ goods;
- Security screening of goods with 24/7 security;
- Temperature controlled environments for specialist goods and materials; and
- Holding centres for trailer vehicles.

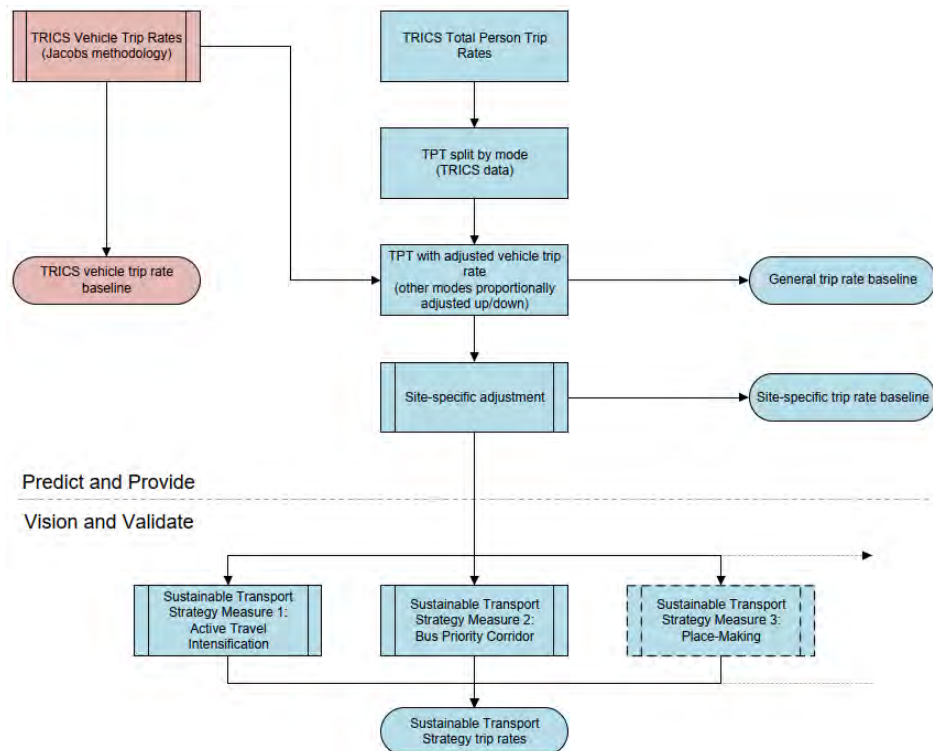
5. Sustainable Transport Modelling – Baseline

- 5.1.1. This chapter outlines the methodology used to determine a person trip model baseline for the Hoo Peninsula, upon which the modal impact of sustainable transport strategies can be assessed. This has been developed to ensure parity with previously issued work by MC, notably the MTMFR of May 2024.
- 5.1.2. This chapter follows the methodology presented in doc ref 109345-XX-XX-RP-TR-000001, previously issued by PF, and has been updated following comments from MC and NH.

5.2. Overview of Methodology

- 5.2.1. MC's MTMFR provided a detailed assessment of the conditions of the transport network on the Hoo Peninsula and the wider Medway region. It analysed the potential impact of possible development in Medway, with total vehicle trip outputs generated for different modelling scenarios across Medway.
- 5.2.2. Four modelling scenarios were tested, both with and without the proposed Lower Thames Crossing (LTC). The LTC is currently awaiting a decision on whether to grant Development Consent Order, with the current deadline in May 2025. The four modelling scenarios were: the Reference Case, the Reference Case with LTC, Local Plan Allocation, Local Plan Allocation with LTC. Each scenario demonstrated (to varying degrees of severity) significant network issues on the Hoo Peninsula, particularly surrounding the Four Elms Roundabout.
- 5.2.3. However, the MTMFR only focused on total vehicle trips (and therefore not other modes) and did not “consider any modal shift assumptions such as walking/cycling improvements or increased facilities being provided at proposed developments thus reducing the need to travel, or mitigation measures”. It was noted that this should form part of the next steps for the local network modelling (MTMFR, p. 98).
- 5.2.4. Therefore, a multi-modal vehicle trip generation approach is proposed in this STS and has previously been agreed with NH and MC. It is again stressed that this approach is proposed to augment and build upon the existing work undertaken by Jacobs on behalf of MC, and is not revisiting it.
- 5.2.5. Details of the vehicle trip generation (from the Jacobs work accepted by MC) are outlined before alternative trip generation methods are proposed and summarised. Only the preferred development sites on the Hoo Peninsula, provided by MC, have been included in this analysis.
- 5.2.6. A multi-modal mode-share and trip generation has been determined and agreed. A broad, nationally-focused modal share (based on TRICS, and in line with the process used by Jacobs to underpin the MC highway mode) has been derived before applying adjustments to ensure that it is more reflective of the Hoo Peninsula's geography. Following this agreement, the impact of different sustainable transport strategies can then be quantitatively measured. The overall process is summarised in Figure 5.1.

Figure 5.1: Overview of Methodology



5.3. Development Quantum

- 5.3.1. An indicative list of preferred sites on the Hoo Peninsula, provided by MC in April 2024, was used as the development basis for this trip generation and that in the MTMFR. This is an emerging development scale under review: whilst this impacts on total generation and future public transport capacity requirements, it does not impact the modal share calculations as the trip rates for each land use are not anticipated to change from previously modelled work.

Table 5.1: Preferred Sites Development Quantum (April 2024)

Land Use	Total Quantum
Residential	
Private Housing	7,071 units
Employment	
B2	43,732sqm
B8	19,250sqm
B1	6,350sqm
Flexible B&E	494,450sqm

5.4. Trip Generation

5.4.1. Baseline Vehicle Trip Generation

- 5.4.1. The July 2024 MTMFR details the expected AM and PM peak vehicle trip generation for different modelling scenarios as previously outlined; this methodology is summarised below.
- 5.4.2. Peak hour vehicle trip rates for developments are based on consented trip rates where available. Where these are not available, trip rates are calculated using TRICS v7.10.2. Each development is assigned a TRICS land use (e.g. 03 Residential Houses Privately Owned, 02 Employment Office) and land type (e.g. Suburban, Town Centre) based on the proposed land use and the geographic location

of the proposed development. Regardless of the peak hours of individual trip generators, network peak hours are determined as 08:00-09:00 (AM) and 17:00-18:00 (PM).

5.4.3. The following criteria were applied in the selection of relevant TRICS surveys:

- Sites within Greater London removed;
- Sites outside of England removed;
- Sites after 1st January 2015 (the default 8 year cut off in TRICS at time of collection) included;
- Weekday surveys only included; and
- Surveys undertaken during the Covid-19 pandemic were discounted.

5.4.4. Upon further analysis, additional assumptions have been made and processes followed when applying trip rates to the relevant proposed developments:

- All relevant areas of the Hoo Peninsula designated as TRICS location type sub-category 'Neighbourhood Centre';
- However, as not all land types have Neighbourhood Centre surveys on the TRICS database at the time of data collection (e.g. Office (B1a); B8 Commercial Warehouse) the next most appropriate land location type has been used in these scenarios (e.g. Town Centre in the case of B1a; Suburban Area in the case of B8);
- Some TRICS trip rates are based on a limited number of surveys (e.g. the trip rate for Affordable Flats Town Centre and Warehouse Edge of Town Centre are both based on one survey), whereas other sites are based on a broad range of site surveys (e.g. the trip rate for Private Houses Neighbourhood Centre is based on 21 surveys);
- There has been no further local focus of the surveys beyond the land use, land type and the criteria outlined above. In the TRICS trip rates for development on the Hoo Peninsula, the only surveys manually de-selected were those impacted by Covid-19;
- Mixed 'B' development is assigned the same trip rate as Industrial (B2) development for corresponding land type;
- Mixed B&E development is assigned the same trip rate as is deemed appropriate for each land type. For Town Centre, the trip rate is the same as Office (B1a); for Neighbourhood Centre, the trip rate is the same Industrial (B2).
- All proposed dwellings on the Hoo Peninsula are assumed to be private houses rather than affordable houses (despite the MC requirement for 25% of developments to be affordable housing as per Medway Council Housing Strategy 2018 – 2022), to ensure robust trip rates.

5.4.5. Table 5.2 summarises the total vehicle trips outlined in the MTMFR for land use types that are proposed on the Hoo Peninsula. Residential rates are vehicle trips per dwellings, employment rates are vehicle trips per 100sqm of development. The full TRICS outputs are shown in **Appendix A**.

Table 5.2: Total Vehicle Trip Rates by Land Use on the Hoo Peninsula (Extracted from the MTMFR)

Land Use	Land Type	AM Peak			PM Peak		
		Arrival	Depart	Total	Arrival	Depart	Total
Residential							
Private Housing	Neighbourhood Centre	0.139	0.296	0.435	0.271	0.141	0.412
Employment							
B1	Town Centre	0.943	0.038	0.981	0.113	0.792	0.905
B2	Neighbourhood Centre	0.486	0.243	0.729	0.159	0.339	0.498
B8	Suburban Area	0.054	0.036	0.090	0.070	0.043	0.113
Mixed	Neighbourhood Centre	0.486	0.243	0.729	0.159	0.339	0.498

Source: Extracted by Pell Frischmann from Table 3-4 – Table 3-7, Medway Transport Model Forecasting Report (2024)

- 5.4.6. Applying the development quantum provided by MC, this results in a total vehicle trip generation shown in Table 5.3.

Table 5.3: Total Vehicle Trip Generation

Land Use	Development Quantum	AM Peak			PM Peak		
		Arrival	Depart	Total	Arrival	Depart	Total
Residential							
Private Housing	7,071 units	983	2093	3076	1916	997	2913
Employment							
B1	6,350sqm	60	2	62	7	50	57
B2	43,732sqm	213	106	319	70	148	218
B8	19,250sqm	10	7	17	13	8	22
Mixed	494,450sqm	2403	1202	3605	786	1676	2462
Total		3669	3410	7079	2793	2880	5673

Source: Pell Frischmann calculations based on MTMFR data

5.4.2. Baseline Total Person Trip Generation

- 5.4.7. An alternative method for generating a suitable trip generation is to use the TRICS multi-modal surveys for each corresponding land use. However, a limitation of this method is that there are fewer multi-modal surveys in the TRICS database as compared to the total vehicle surveys previously used. Therefore, trip rates used in the analysis will be based on fewer surveys and so are less likely to be based on the Neighbourhood Centre land use as previously specified.
- 5.4.8. As with the total vehicle surveys method of MTMFR, total person trip rates are calculated using the latest version of TRICS where consented peak hour vehicle trip rates are not available. Each development is again assigned a TRICS land use (e.g. 03 Residential Houses Privately Owned, 02 Employment Office) and land type (e.g. Suburban, Town Centre) based on the proposed land use and the geographic location of the proposed development. Regardless of the peak hours of individual trip generators, network peak hours are determined as 08:00-09:00 (AM) and 17:00-18:00 (PM) and are used in the subsequent analysis.
- 5.4.9. The following criteria were applied in the selection of relevant TRICS surveys:
- Sites within Greater London removed;
 - Sites outside of England removed;
 - Sites after 1st January 2015 (the default 8 year cut off in TRICS at time of collection) included;
 - Weekday surveys only included; and
 - Surveys undertaken during the Covid-19 pandemic were discounted.
- 5.4.10. Again, these procedures and assumptions are the same as those used in the MTMFR to ease the comparison of the data.
- 5.4.11. Table 5.4 summarises the total person trip rates using the same criteria as outlined in the MTMFR for proposed land use types on the Hoo Peninsula. Residential rates are person trips per dwellings, employment rates are person trips per 100sqm of development. Due to the limited number of multi-modal surveys available for B8 Suburban Area (and substantial variation between the total vehicle and multi-modal surveys reducing the reliability of comparisons) an implied person rate has been used alternatively for this land use (total vehicle rates as per MTMFR divided by total vehicle multi-modal mode share, highlighted later).

Table 5.4: Total People Trip Rates by Land Use on the Hoo Peninsula

Land Use	Land Type	AM Peak			PM Peak		
		Arrive	Depart	Total	Arrive	Depart	Total
Private Housing	Neighbourhood Centre	0.169	0.648	0.817	0.548	0.220	0.768
B1	Town Centre	1.724	0.160	1.884	0.064	1.283	1.347
B2	Neighbourhood Centre	0.737	0.263	1.000	0.150	0.457	0.607
B8	Suburban Area	0.059	0.040	0.099	0.077	0.048	0.125
B&E	Neighbourhood Centre	0.737	0.263	1.000	0.150	0.457	0.607

Source: Pell Frischmann

- 5.4.12. Using the development quantum provided by MC in April 2024 and outlined in paragraph 5.3.1, the resulting total people trip generation shown is in Table 5.5.

Table 5.5: Total People Trip Generation

	Development Quantum (units / sqm)	AM Peak			PM Peak		
		Arrival	Depart	Total	Arrival	Depart	Total
Residential							
Private Housing	7071 units	1195	4582	5777	3875	1556	5431
Employment							
B1	6,350sqm	109	10	120	4	81	86
B2	43,732sqm	332	115	437	66	200	265
B8	19,250sqm	11	8	19	15	9	24
Mixed B/E	494,450sqm	3644	1300	4945	742	2260	3001
Total		5282	6015	11297	4701	4106	8807

Source: Pell Frischmann calculations

5.5. Baseline Multi-Modal Trip Generation

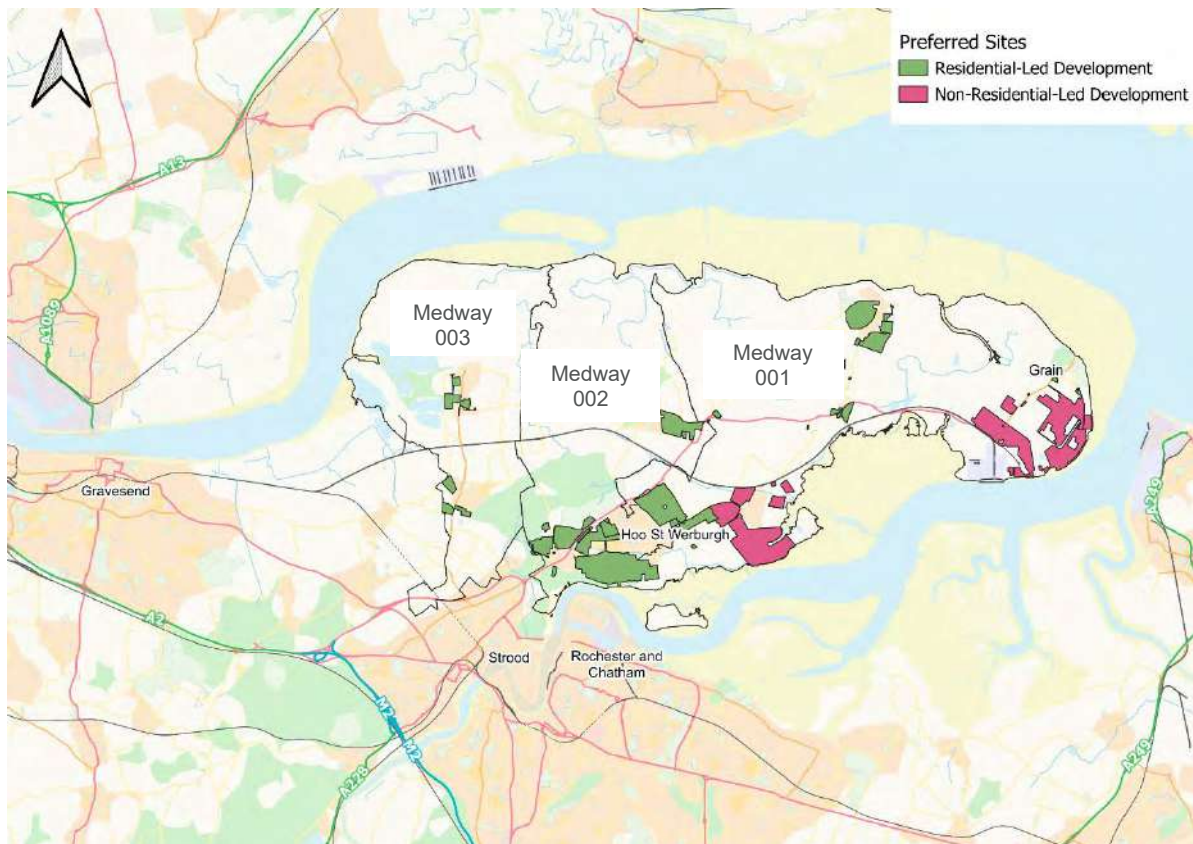
- 5.5.1. Using the total person trip rates from TRICS, a modal share can be derived and understood. There are two common, industry-standard ways to derive a mode share: using census data; and using TRICS-derived rates. Both methods are outlined, however it has been reasoned that using a TRICS-derived rate is the most appropriate on the Hoo Peninsula as detailed below.

5.5.3. Census-derived Mode Share

- 5.5.2. Data from the Office for National Statistics (ONS) provides information detailing reported Method of Travel to Work at local, regional and national levels, providing an overall modal split for commuters. Applying Method of Travel to Work census data (assumed representative of peak hours) to total person trip rates to derive vehicle and other mode trip rates, is an industry-standard method of multi-modal analysis. This method has been applied to the trip rates generated for each land use in the MTMFR and is detailed later on in this chapter. However, it is concluded that this method is not the most appropriate for the situation on the Hoo Peninsula. The analysis has been retained in this document for completeness.
- 5.5.3. For the purpose of this analysis, the Middle Layer Super Output Area (MSOA) Medway 003 (see Figure 5.2 below) has been identified as the most appropriate of the MSOAs regards expected mode choice behaviour. Whilst the Preferred Sites on the Hoo Peninsula are predominantly sited in both Medway 001 and Medway 003 (with a limited number of sites located in Medway 002), Medway 003 is the area most reflective of the proposed developments. Medway 001 is a large, remote area of Medway with sparse, scattered development and very limited public transport provision. Medway 002 is a large area with little development and an additional connection into Gravesend. Comparatively, Medway 003 is

comprised of clustered development with some existing public transport centred around Hoo St Werburgh. Development extending into the adjacent to Medway 003 would form an urban extension of the Hoo St Werburgh area. As such, residents, employees and other trip makers of future development are likely (in the first instance) to behave similarly to those currently in Hoo St Werburgh.

Figure 5.2: Local Plan Preferred Sites by MSOA



Source: Ordnance Survey with Pell Frischmann and Medway Council annotations (July 2024)

2011 Census Data

- 5.5.4. Whilst later-released census data from 2021 is available, 2011 census data is still used by the industry as an approximate modal share source as its data has not been skewed by the effects of the Covid-19 pandemic.
- 5.5.5. Table 5.6 shows the modal split for Journey to Work trips for the Hoo Peninsula (originating from Medway 003). As anticipated, due to the isolated nature of the Peninsula and the limited existing public transport provision, a high private vehicle-based mode share is seen (80.5% either drive or are driven to work here).

Table 5.6: Method of Travel to Work Census Data 2011 (ONS)

Method Used to Travel to Workplace	Modal Share
Underground, metro, light rail, tram	0.2%
Train	5.5%
Bus, minibus or coach	5.1%
Taxi	0.3%
Motorcycle, scooter or moped	1.4%
Driving a car or van	75.4%
Passenger in a car or van	5.1%
Bicycle	1.2%
On foot	5.6%

Other method of travel to work	0.1%
--------------------------------	------

Source: WU03EW – Location of usual residence and place of work by method of travel to work (MSOA level), ONS (2011)

Note: Numbers may not sum due to rounding

- 5.5.6. Additionally, it should be noted that census Journey to Work reports main mode of journey. Notably, 5.5% of people report using the train as their main mode, however there are no rail access points on the Peninsula, so an alternative mode would be used to leave the Peninsula in order to access the rail network.
- 5.5.7. Applying this data directly to the MTMFR trip rates (i.e. by assuming the TRICS-derived total vehicle trip rate is 75.4% of trips, and factoring that to infer a total person trip rate) produces unrealistically low trip rates. The 'back calculation' of these trip rates results in two-way residential journeys of 0.566 (AM peak) and 0.536 (PM Peak) total person trips per dwelling, which appears unreasonably low and so would underestimate people's propensity to travel. Therefore, further analysis of existing data must be explored in order to generate a representative baseline modal share, rather than a simple application of 2011 Method of Travel to Work census data.

2021 Census Data

- 5.5.8. Table 5.7 shows the modal share for trips work on the Hoo Peninsula as reported in the 2021 census. The same origin MSA as previously has been used to aid comparison (Medway 003). It must be noted that this data was collected during the Covid-19 pandemic, with temporary shifts in working, living and travel habits limiting the validity of the data. The broad picture is unchanged since 2011, with private vehicles still the primary mode of travel. However there has been an increase in those driving to work (up 5.4% to 80.5%), whilst the bus modal share has halved to 2.5%, with comparatively minor changes in share amongst the remaining methods of travel.

Table 5.7: Method of Travel to Work 2021 Census Data (ONS)

Method Used to Travel to Workplace	Modal Share
Underground, metro, light rail, tram	0.2%
Train	3.8%
Bus, minibus or coach	2.5%
Taxi	0.2%
Motorcycle, scooter or moped	0.9%
Driving a car or van	80.5%
Passenger in a car or van	5.3%
Bicycle	0.7%
On foot	5.5%
Other method of travel to work	0.6%

Source: Source: Custom Filter – Middle layer Super Output Areas, Method used to travel to workplace (12 categories) and Place of work indicator (6 categories), ONS (2021)

Note: Numbers may not sum due to rounding

- 5.5.9. Applying this data directly to the MTMFR trip rates (through the same back calculation as undertaken above with the 2011 census data) continues to produce unrealistically low trip rates. Back-calculating these trip rates results in two-way residential journeys of 0.534 (AM peak) and 0.506 (PM Peak) trips per dwelling. As with the 2011 data, these are significantly lower trip generations than would be expected. Consequently, whilst the 2021 Method of Travel to Work census data can help inform an anticipated modal split, back-calculating the MTMFR trips using this data alone will not generate an reasonable multi-modal trip baseline.

Limitations of Census Data

- 5.5.10. From the above it is clear that applying Method of Travel to Work census data alone is not a suitable methodology for producing a representative modal split and corresponding vehicle trip generation. Whilst using this methodology is an industry-standard method of working, there are limitations to only

working with census data. Firstly, not all peak journeys are employment-orientated (which is the sole relevance of the census data). Nationally, shopping is the largest daily trip generator, followed by employment (National Travel Survey 2022, DfT). This is particularly relevant in the Hoo Peninsula, with 36% of residents economically inactive or not in employment, including 19.5% pensioners (2021 Census TS066 Economic activity status, ONS). Generally, journey to work data will underestimate the number of shorter, non-employment journeys, which are more likely to be made by active travel and public transport, particularly buses.

- 5.5.11. Additionally, multi-purpose / combination trips are not captured in this data. This is especially relevant for AM peak trips where journeys to work are commonly combined with journeys to educational facilities – e.g. a parent or guardian dropping their child at school, then continuing on to their workplace.
- 5.5.12. Census data also produces a blanket modal share and does not differentiate by land use or local employment accessibility. Different employment centres are likely to be located in different areas of with varied existing transport networks, resulting in overall different mode-shares. As future employment centres are anticipated to be high trip generators on the Hoo Peninsula, small changes in mode share can have a significant impact on the total number of people travelling by each mode.
- 5.5.13. Both the 2011 and the 2021 census lack temporal validity. 2021 census data is skewed by Covid-19. It underestimates public transport mode share; nationally bus patronage rose [in England, but outside of London] 88.2% from 2021 - 2022 (National Travel Survey 2022, DfT). and overestimates working from home data as many have returned to their workplaces in the period since. The alternative – 2011 data – is now 13 years old; societal changes (including those as a long-term consequence of the Covid-19 pandemic), spatial changes and the corresponding changes in travel habits are not captured. Given this, the broad picture in 2011 and 2021 can help refine modal share characteristics of the Hoo Peninsula with localised data.
- 5.5.14. Overall, census Method of Travel to Work data lacks nuance, is limited by the time of the data and has a reduced applicability as only employment trips are registered. Furthermore, the application of census data to the trip rates of the MTMFR produces potentially low trip rates so an alternative method of modal share generation should be used. Both 2011 and 2021 census data do however provide a useful local trip context and can be used to inform any modal shares calculation.

5.5.4. TRICS-derived Mode Share

- 5.5.15. An alternative method to that. Due to the limitations of census data as outlined above, it is reasoned that a TRICS-derived mode share is the most appropriate method of determining a nationwide baseline multi-modal mode share; census data can then be used to help inform a more Hoo-specific mode share.
- 5.5.16. Using the search criteria as presented in Section 5.4.2, a multi-modal mode share is derived for the developments on the Hoo Peninsula using TRICS multi-modal surveys for each land use and land type that is proposed. To ensure parity between PF's data and that presented in the MTMFR, the multi-modal trip generation is to be adjusted to fix the Total Vehicle component of the multi-modal trip generation to be equal to that calculated from the MTMFR, with the remainder of trips proportionately distributed to/from other modes.
- 5.5.17. The resulting output is a consistent mode share for each land use and land type. However, this TRICS-derived modal share does not necessarily reflect the particular geography of the Hoo Peninsula. Site-specific adjustments are applied to the [effectively national] TRICS modal share and where necessary to refine the Hoo-specific mode shares as informed by the 2011 and 2021 census data (with the remaining mode share distributed equally in proportion to the blended census data).
- 5.5.18. A summary of the proposed baseline modal shares for each proposed land use on the Hoo Peninsula is provided in **Table 5.8 – Table 5.11**. The TRICS-derived mode share and the final census-adjusted mode share are presented for each land use type, with the net change between the adjusted mode shared and the TRICS-derived also shown. It is noted that throughout that the car driver (i.e. total vehicles) mode share is fixed to be consistent with the agreed Jacobs MTMFR assumptions.

Table 5.8: Residential - Modal Share Summary

Mode Share	AM Peak			PM Peak		
	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change
Cyclists	1.4%	2.0%	+0.6%	1.3%	1.9%	+0.6%
Vehicle Passengers	33.7%	23.7%	-10.0%	36.6%	26.6%	-10.0%
Pedestrians	8.8%	12.5%	+3.7%	4.9%	8.5%	+3.6%
Bus/Coach Passengers	2.0%	4.6%	+2.6%	2.4%	5.0%	+2.6%
Rail Passengers	0.9%	4.0%	+3.1%	1.2%	4.4%	+3.2%
Cars and M-Cycles	53.2%	53.2%	0.0%	53.6%	53.6%	0.0%

Pell Frischmann calculations

Note: Numbers may not sum due to rounding; LGV and OGV trips are excluded from cars and motorcycle category as servicing trips

Table 5.9: B8 Storage or Distribution - Modal Share Summary

Mode Share	AM Peak			PM Peak		
	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change
Cyclists	0.0%	0.2%	+0.2%	0.9%	0.9%	0.0%
Vehicle Passengers	8.9%	6.4%	-2.5%	0.9%	0.9%	0.0%
Pedestrians	0.0%	0.9%	+0.9%	6.1%	6.1%	0.0%
Bus/Coach Passengers	0.0%	0.6%	+0.6%	1.7%	1.7%	0.0%
Rail Passengers	0.0%	0.8%	0.8%	0.0%	0.0%	0.0%
Cars and M-Cycles	91.1%	91.1%	0.0%	90.4%	90.4%	0.0%

Pell Frischmann calculations

Note: Numbers may not sum due to rounding; LGV and OGV trips are included in the car and motorcycle category as an overall component of the total people trip generation

Table 5.10: B1 Office - Modal Share Summary

Mode Share	AM Peak			PM Peak		
	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change
Cyclists	2.3%	2.8%	0.4%	1.9%	2.2%	0.2%
Vehicle Passengers	7.6%	10.0%	2.3%	2.5%	3.8%	1.3%
Pedestrians	10.6%	13.1%	2.5%	7.4%	8.8%	1.4%
Bus/Coach Passengers	14.3%	16.1%	1.8%	10.4%	11.4%	1.0%
Rail Passengers	13.0%	6.0%	-7.0%	10.7%	6.7%	-4.0%
Cars and M-Cycles	52.1%	52.1%	0.0%	67.2%	67.2%	0.0%

Pell Frischmann calculations

Note: Numbers may not sum due to rounding

Table 5.11: B2 Industrial and Mixed B/E - Modal Share Summary

Mode Share	AM Peak			PM Peak		
	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change	TRICS-Derived Mode Share	Census Adjusted Mode Share	Net Change
Cyclists	0.1%	0.5%	+0.3%	0.2%	0.3%	+0.1%
Vehicle Passengers	18.8%	13.8%	-5.0%	11.9%	9.9%	-2.0%
Pedestrians	6.2%	8.0%	+1.8%	4.4%	5.1%	+0.7%
Bus/Coach Passengers	1.9%	3.2%	+1.3%	1.4%	2.0%	+0.5%
Rail Passengers	0.1%	1.7%	+1.6%	0.0%	0.6%	+0.6%
Cars and M-Cycles	72.9%	72.9%	0.0%	82.0%	82.0%	0.0%

Pell Frischmann calculations

Note: Numbers may not sum due to rounding

5.6. Baseline Mode Share Summary

- 5.6.1. In this chapter, the method previously agreed to generate a baseline mode share has been outlined. This is based on TRICS multi-modal survey data, with the approach and assumptions used to reflect the previous Jacobs work as closely as possible. The vehicle modal rate has been fixed to the vehicle generation outlined in the MTMFR to ensure parity between PF's data and Jacobs' work. This nationally-orientated mode share is adjusted to closer reflect the Hoo Peninsula's geography and demographics, as informed by census data. This overall approach is unchanged since previously issued work.
- 5.6.2. Following the establishment of this baseline, a sustainable transport interventions can be outlined and their subsequent impact reviewed.

6. Sustainable Transport Strategies

- 6.1.1. This section details the proposed sustainable transport interventions and strategies that will be used to facilitate the core sustainable vision on the Hoo Peninsula. For brevity, the vision – which was previously outlined in Chapter 4 – is reiterated below.

THE CORE VISION

Achieve economically prosperous and inclusive low-carbon development on the Hoo Peninsula by integrating sustainable, active, and public transport into new developments. This people-focused, modern approach shifts away from traditional, vehicle-centric urban design, prioritising people at the top of the street user hierarchy.

- 6.1.2. In order to meet the core vision above, and the strategic visioning objectives previously outlined, a multi-pronged approach to sustainability is required. There is no ‘magic bullet’ to the current transport limitations on the Hoo Peninsula. A future-ready strategy which moves away from historic vehicle-orientated development towards people-orientated living at its heart is required.
- 6.1.3. The Hoo Peninsula requires a multi-faceted strategic approach, which is embedded within developments from the outset, and which targets a range of residents, employees and other visitors to the Hoo Peninsula. Sustainable living, as well as just sustainable travel, needs to be facilitated in order to develop a truly holistic strategy that maximises this genuine opportunity to achieve high quality, sustainable growth on the Hoo Peninsula.
- 6.1.4. In line with the prioritisation of the street users’ hierarchy, it is envisaged that three core sustainable interventions form the basis of this sustainable strategy:
- Place-making
 - Active travel improvements
 - Bus strategy

6.2. Place-making

- 6.2.1. In order to reduce the car dependency, localised trips to replace long distance trips should be encouraged; local trips have the greater potential to be shifted away from motor vehicles to alternative sustainable modes such as walking and cycling. Replacing the *need* to travel long distances can be an effective way to capture frequent and regular leisure and employment trips such as commuting, education trips and shopping. For this to be achievable, place making must be brought forward in line with active travel infrastructure.
- 6.2.2. Increasing localised trips by reducing the necessity to leave the Hoo Peninsula for everyday services and facilities would be an effective way to reduce travel by private car. As well as meeting the needs of the new users of the proposed developments, this strategy also has the capacity to change the travel habits of the existing residents and employees of the Hoo Peninsula. This is achieved by co-ordinated mixed development.
- 6.2.3. A range of local employment sites and facilities will need to be considered for development on the Hoo Peninsula, including schools, retail stores and medical facilities.

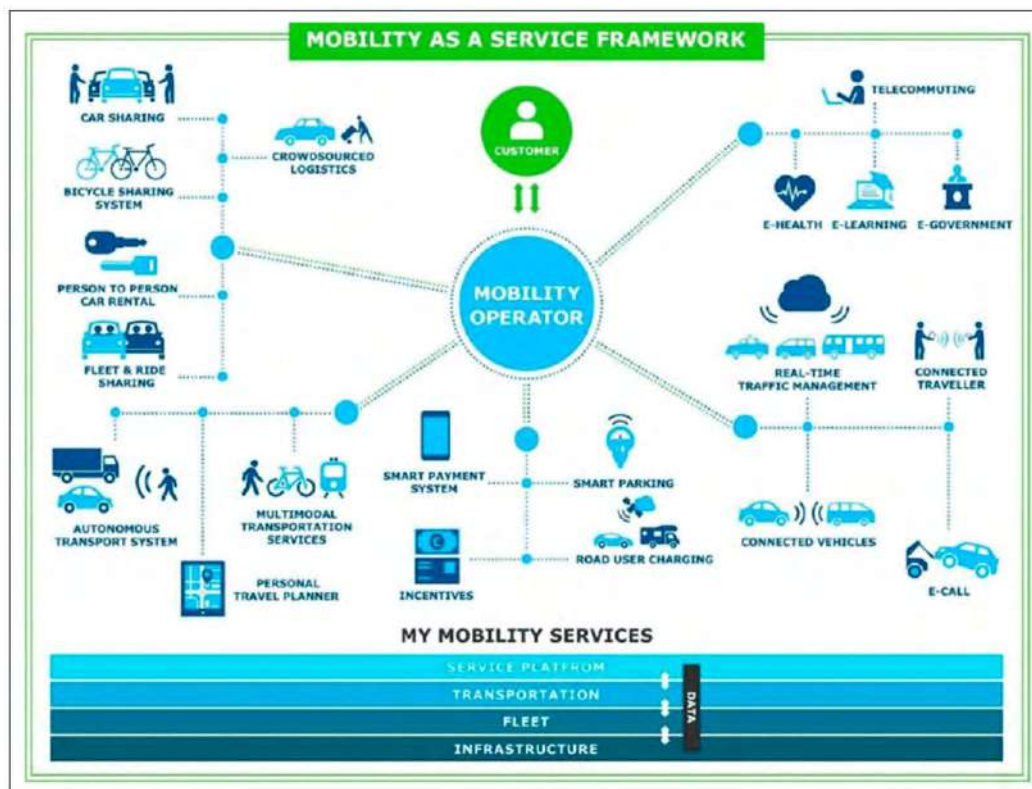
6.2.2. Integrated Transport Ticketing / Mobility as a Service (MaaS)

- 6.2.4. In Medway, integrated ticketing has the opportunity to connect between different modes of public transport. There are two primary train operators in the area (Southeastern and Thameslink) and four bus operators (Arriva, Nu-Venture, Redroute Buses and Stagecoach, which connects Medway to wider

Kent); a single digital ticketing system between these operators would simplify sustainable transport for end users and encourage its uptake.

- 6.2.5. Ambitiously, multi-modal journeys could be combined through Mobility as a Service (MaaS). MaaS is an innovative transportation model that integrates various forms of transport services into a single accessible digital platform. Users can plan, book, and pay for multiple types of mobility services, such as public transport, ride-hailing, bike-sharing, and more. This approach offers a flexible alternative to owning a vehicle, enhancing convenience and efficiency by providing seamless travel options tailored to individual needs.
- 6.2.6. A MaaS framework, which could be ambitiously applied to Medway, was proposed and outlined by Kivimäki et al in Finland in 2014, as shown in Figure 6.1.

Figure 6.1: MaaS Framework



Source: Kivimäki et al (2014)

6.2.3. Hoo St Werburgh Mobility Hub / Interchange

- 6.2.7. Mobility hubs are highly visible, safe, and accessible spaces where public transport, active travel and shared modes are co-located alongside improvements to public realm with community facilities where relevant. The redesign and reallocation of space away from the private car enhances the experience for travellers and creates a more pleasant environment for everyone.
- 6.2.8. In seeking to provide an integrated transport and mobility system as part of the development, mobility hubs offer an innovative solution to meeting the needs of the development. Mobility hubs allow residents to quickly interchange between various transport modes when moving around the local area and accessing amenities in Medway and beyond.
- 6.2.9. Regardless of size or spatial surroundings, mobility hubs maintain three core characteristics:
- *“Co-location of shared mobility modes.*
 - *Redesign of space to reduce private car space and improve the surrounding public realm.*

- *A pillar or sign which identifies the space as a mobility hub which is part of a wider network and ideally provides digital travel information.*²

6.2.10. As per *CoMoUK Mobility Hub Deliver Models (October 2021)*, the following transport facilities are recommended to be incorporated into a mobility hub, although it is understood that spatial requirements may limit what can be provided at each hub:

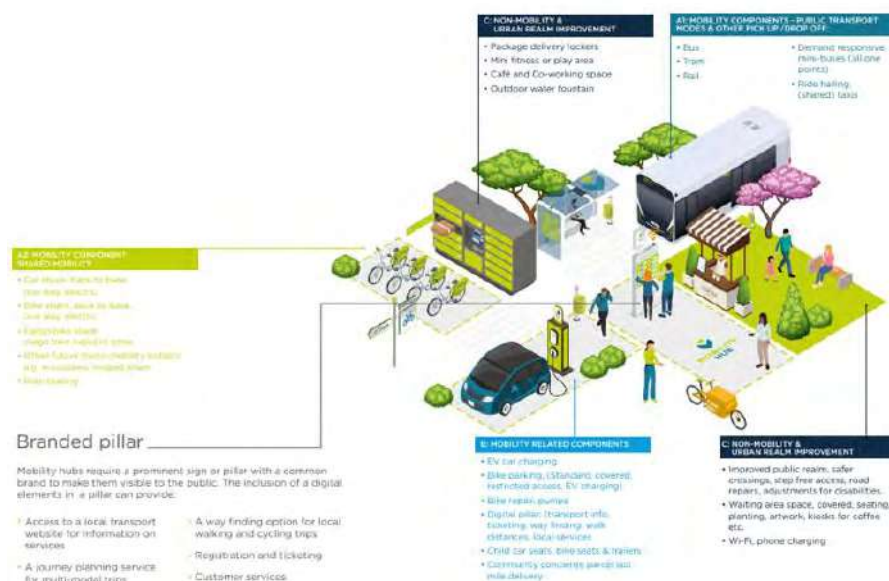
- Access to local bus service;
- DRT feeder service;
- Car club parking bay(s);
- Secure cycle storage;
- Bike share / Micromobility scheme;
- Cycle repair stand / pump;
- Electric vehicle charging bays; and
- Digital pillar (providing information on local transport, way-finding, walking distances and local services).

6.2.11. In addition to transport provisions (such as bus infrastructure, cycle parking and micro-mobility docking stations), additional community facilities could be integrated within the hub in order to generate a self-sufficient development. These include (but are not limited to):

- Café;
- Community or arts space;
- Co-working spaces (with high speed wi-fi);
- Amazon lockers (or similar);
- Medical facilities and information points;
- Library, book store or book dispenser;
- Green roof and/or landscaped green space;
- Play area; and
- Consolidated refuse bins.

6.2.12. Figure 6.2 shows the key and desirable components of mobility hubs, with many facilities to be incorporated into the hubs' designs across the site.

Figure 6.2: Components of mobility hubs



Source: UK Mobility Hub Guidance, CoMoUK (2019)

² <https://como.org.uk/shared-mobility/mobility-hubs/what/> (CoMoUK, 2021)

6.2.13. Sites should be designed around sustainable active modes which will provide access to public transport services, particularly at mobility hubs. A key mobility hub is proposed at Hoo St Werburgh, close to Roper's Lane with a proposed integration of community provisions and transport infrastructure as highlighted by CoMo UK. This will complement the on-going development of Strood Interchange and previous redevelopment of Gravesend Bus Hub.

6.2.4. Amenity Accessibility

6.2.14. Additional amenities need to be brought forward as part of this strategy, in addition to mixed use employment and residential developments. These should be adequately located within appropriate walking and cycling distances. Whilst there is no standard recommended distance – with propensity to travel dictated by individual, local conditions – CIHT does suggest the following acceptable walking distances:

Table 6.1: Suggested acceptable walking distances

	Town Centres (m)	Commuting / School (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

Source: Table 3.2, Guidelines for Providing for Journeys on Foot, CIHT (2000)

6.2.15. The following everyday amenities should be provided across the Hoo Peninsula. Where possible, they should be accessible by walking. Where this is not achievable, they should be located within close proximity of a frequent bus service:

- Local food shops;
- Primary schools;
- Secondary school;
- GP Surgeries;
- Pharmacies;
- Dentists;
- Supermarkets;
- Gyms and sporting facilities;
- Community facilities;
- Pubs, restaurants and cafes;
- Other leisure facilities; and
- Green spaces.

6.2.5. Site Development

6.2.16. In line with the ease of access of local amenities, master planning of proposed developments should be public transport and active travel-orientated. Whilst the location of bus stops and bus routes is a constant trade off between accessibility coverage and speed of service, the following should be considered from the outset of all developments:

- Locate amenities on or close to public transport routes
- Bus routes should be able to seamlessly travel between developments with minimal U-turns or re-routing.
- Site permeability for active travel routes between sites and with existing infrastructure and development
- Bus route resilience must be considered and secondary, alternative bus routing in the event of primary road closures considered. This is particularly pertinent during construction phases where roads may require closure.

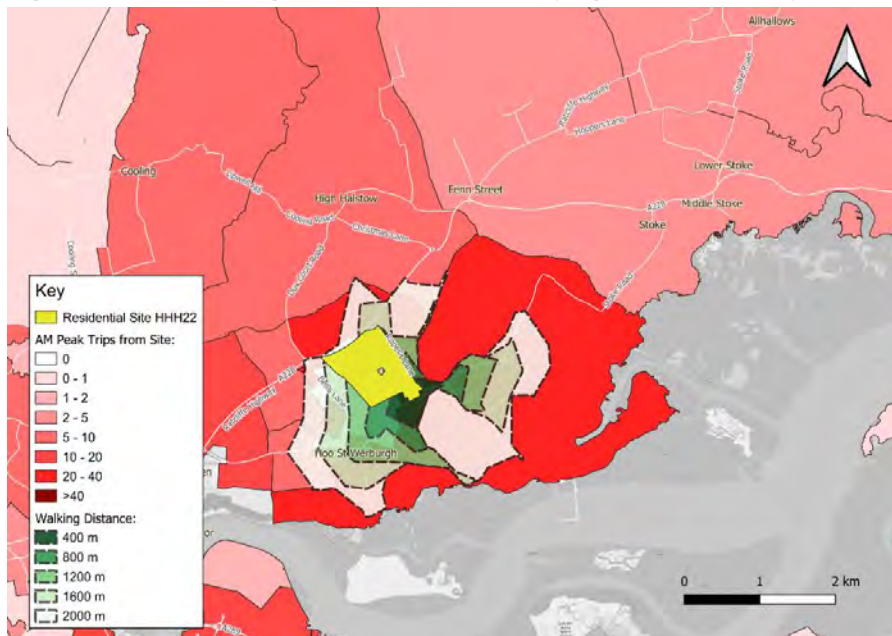
- Key mobility hubs embedded within major sites from the outset. Should provide the opportunity for multi-modal transport with opportunity charging facilities for electric buses. Should be a community facility located within a cluster of amenities.

6.3. Active Travel Improvements

6.3.6. Walking Opportunities

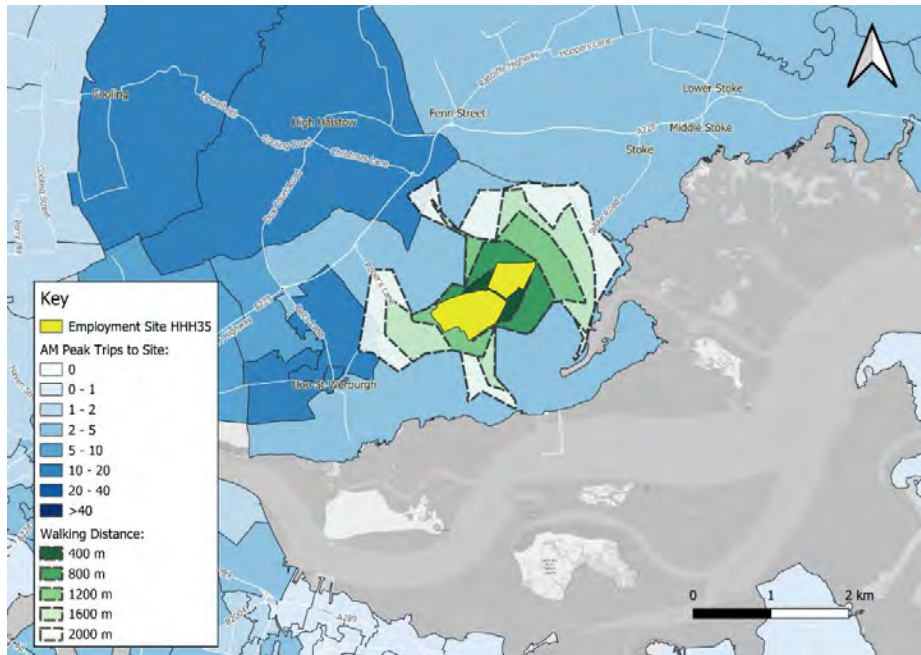
- 6.3.1. In the 2015 CIHT guidance *Planning for Walking*, walking neighbourhoods are defined as “having a range of facilities within 10 minutes’ walking distance (around 800 metres)” (p. 30), which also corresponds to recent Active Travel England (ATE) guidance (Criterion 3, *Planning Application Assessment Tool*).
- 6.3.2. Using this idea of a “walking neighbourhood”, Figure 6.3 and Figure 6.4 show the accessibility of the proxy residential and employment sites at Hoo St Werburgh within 25 minutes’ walk time. These accessibility isochrones are overlaid on AM peak departure and arrival choropleths respectively.

Figure 6.3: 2km Walking Isochrones with Underlying AM Peak Employment Choropleth



Source: OpenStreetMap Contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 6.4: 2km Walking Isochrones with Underlying AM Peak Employment Choropleth



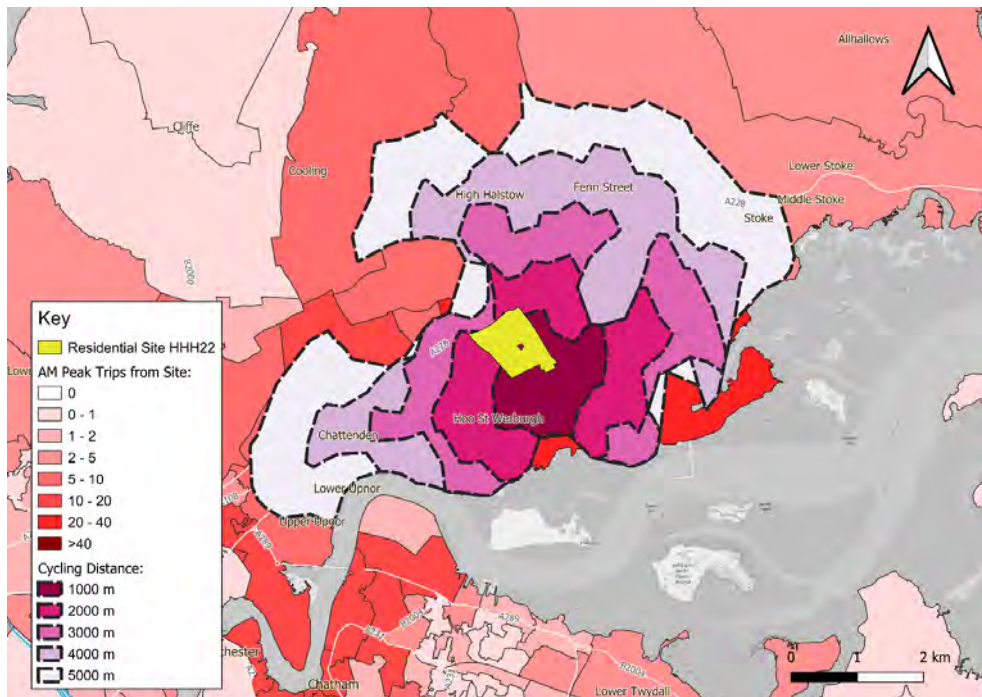
Source: OpenStreetMap Contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

- 6.3.3. The figures above demonstrate that a substantial number of employment and residential trips are anticipated to be local; people actively choose to minimise commute distances by living near where they work in order to improve their overall quality of life.
- 6.3.4. The isochrones shown have been developed using the existing walking network; improvements to the local walking infrastructure will further increase the accessibility of the sites and encourage further local walking trips. This is particularly noticeable to the north and south in Figure 6.4. Possible improvements to the walking network include:
- Site permeability connecting existing development with the proposed sites
 - Ensure new routes are direct, safe and coherent across the developments
 - Upgrade of existing routes with appropriate lighting, additional tactile paving and appropriate widths (minimum 2.0m with pinch points no less than 1.5m)
 - Improved wayfinding across the Hoo Peninsula

6.3.7. Cycling Opportunities

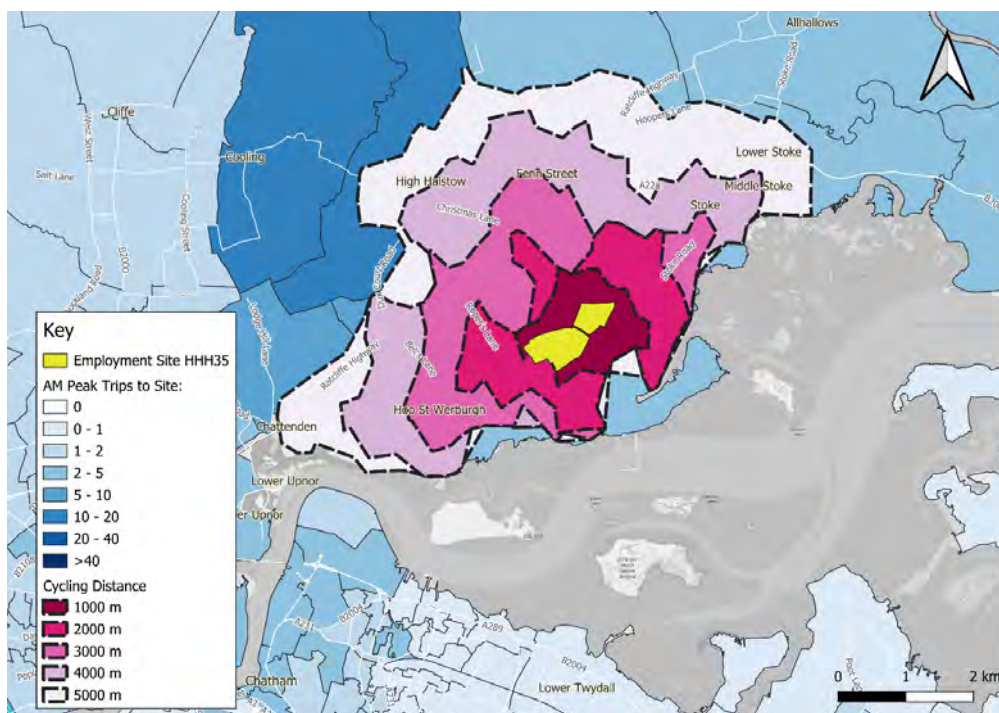
- 6.3.5. Whilst national and local policy encourages sustainable development and a shift away from private car use, there is no specific recommended maximum cycle distances for access to services / leisure facilities from new developments stated within the NPPF or local planning policy. The distances people are willing to travel by bicycle is highly variable depending on the type of development, Site users and age profile as well as the perception of personal safety in the local environment. However, Local Transport Note 2/08 (published by the Department for Transport and now superseded by LTN1/20) does provide a useful reference point; it indicates that an acceptable distance for general trips by cycle is considered to be up to 5km (5000m), but it also acknowledges that this may be slightly longer (up to 8km) for those commuting to employment uses by cycle.
- 6.3.6. Using this recommended cycling distance of 5.0km (20 minutes), Figure 6.5 and Figure 6.6 show that there is a clear propensity for local employment and residential travel which can be accessible by bicycle. The 5km isochrones have been developed using the existing cycle network: improvements to and an expansion of the cycle network will further increase the accessibility of the proposed developments by bike.

Figure 6.5: 5km Cycle Isochrones with Underlying AM Peak Residential Choropleth



Source: OpenStreetMap Contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 6.6: 5km Cycle Isochrones with Underlying AM Peak Employment Choropleth



Source: OpenStreetMap Contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

- 6.3.7. From the above, there is clearly a high level of cycle accessibility from Hoo St Werburgh towards Chattenden, Lower Upnor and Wainscott. Therefore, cycle infrastructure could be improved between Hoo St Werburgh and Strood, where connections into existing infrastructure would be required. This would form part of a green sustainable corridor and is envisaged to run adjacent to a BRT corridor (discussed in the next section).
- 6.3.8. Linking new developments by cycle lanes with High Halstow, Sharnal Street, and the Stokes is evidently advantageous from the above figures. An eventual connection to employment sites at Grain

would also be beneficial and would connect existing developments together coherently. Cycling connections into existing infrastructure and the NCN Route 1 and Route 179 would also be advantageous.

- 6.3.9. The potential to introduce a cycle hire scheme will be explored, potentially in tandem with the opening of the multi-modal mobility hubs. This would likely require partnership with a provider who would then be allowed to operate within the Medway area. Modern cycle hire schemes generally do not require specific infrastructure, but space within emerging development proposals for the Site will be incorporated to allow for the implementation of a cycle hire scheme.

6.4. Bus Strategy

6.4.8. Bus Rapid Transit (BRT)

- 6.4.1. A Bus Rapid Transit system is proposed for the Hoo Peninsula. It must adequately increase accessibility across the Hoo Peninsula and provide a connection between the Hoo Peninsula and greater Medway. Principally, the proposed BRT is to connect Hoo St Werburgh, Strood, Gravesend and Ebbsfleet, with an additional onward connection from Hoo St Werburgh to Grain and Allhallows. A limited stopping express service (similar to the Superloop in London) is proposed to connect Hoo St Werburgh and Strood, with a conventional BRT service between Strood and Ebbsfleet (using new and some existing BRT infrastructure).
- 6.4.2. The proposed route is summarised in Figure 6.7.

Figure 6.7: Proposed BRT Route



Source: OpenStreetMap contributors with Pell Frischmann annotations

- 6.4.3. Key components of BRT systems which can be explored in Medway include:
- Dedicated running ways: Exclusive lanes for BRT buses to ensure faster and more reliable service by avoiding general traffic. This may be separated lanes or guided busways;
 - Enhanced stops: Well-designed stops that provide amenities such as shelters, seating, lighting, ticket vending machines, and real-time arrival information;
 - Innovative vehicles: Specialised buses designed for comfort, accessibility, and environmental sustainability.
 - Efficient fare collection: Off-board fare collection systems to reduce boarding times and improve overall efficiency;

- Intelligent Transportation Systems (ITS): Technologies such as transit signal priority, real-time tracking, and automated scheduling to enhance service reliability and convenience;
- Service planning: Careful planning of routes and schedules to meet the demand and ensure seamless integration with other modes of transport (principally at Strood, Gravesend and Ebbsfleet Railway Stations); and
- Branding and marketing: Distinctive branding to differentiate BRT from other transit services and improve public perception and usage.

6.4.4. Figure 6.8 and Figure 6.9 show examples of the BRT between Huntington and Cambridge in the East of England. This is a highly successful service and exhibit common features identified as key to BRT services including branding, enhanced stations and dedicated runways (segregated bus lane to the left, guided busway to the right).

Figure 6.8: Cambridge BRT



Figure 6.9: Cambridge BRT Stop



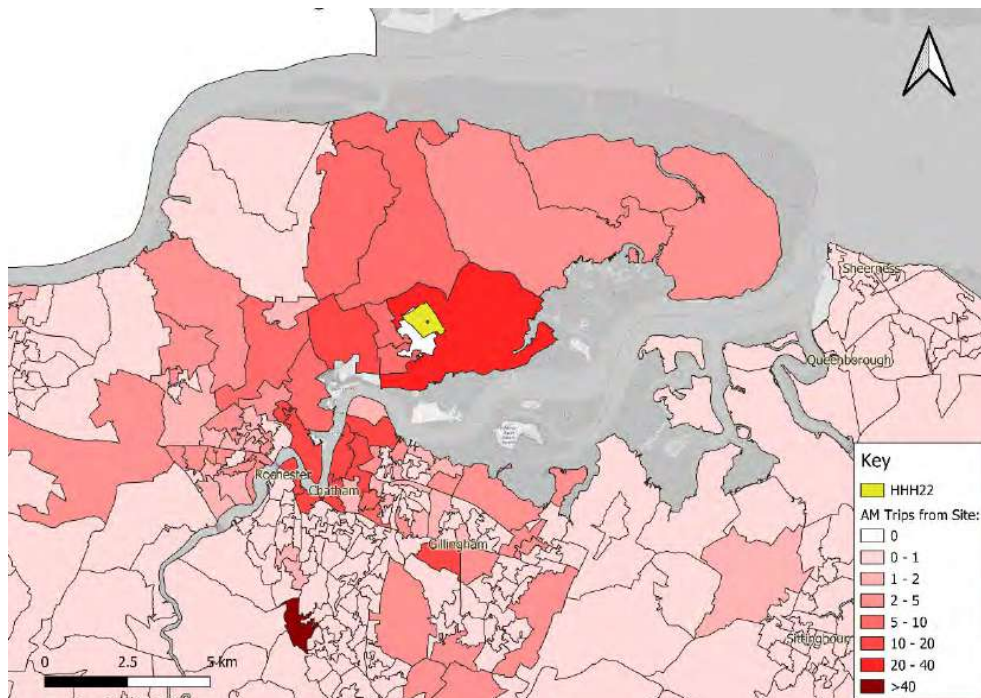
- 6.4.5. It is vital that bus services are integrated with railway stations and timetables. By ensuring that buses are well-coordinated with train schedules, seamless travel is facilitated to a range of employment and leisure destinations, thus encouraging multi-modal sustainable trips.
- 6.4.6. It is proposed to link the BRT service into Strood Railway Station, Gravesend Railway Station and Ebbsfleet Railway Station. This ties in with the emerging work of the multi-modal Strood Interchange adjacent to Strood Station. It is proposed that, as well as a bus terminus, the Strood Interchange has capacity for through routes between Ebbsfleet and the Hoo Peninsula, in which buses do not need to enter a turning area (which would add needless journey time with minimal benefit for through routes). This could possibly be achieved with dedicated bus stand provision on Canal Road.
- 6.4.7. Linking into Strood, Gravesend and Ebbsfleet stations provides connections to a variety of stopping and high speed services into London (including Victoria, Stratford International, Kings Cross St Pancras, London Bridge and Blackfriars) on services operated by Thameslink and Southeastern. A range of local destinations are also accessible including Ashford, Sandwich, Margate, Faversham and the other Medway towns. The possible future re-instating of international routes has also been catered for by providing a connection into Ebbsfleet International.

6.4.9. Local Buses

- 6.4.8. Enhanced local bus services are to complement the primary BRT route. A stopping service between Strood and Hoo St. Werburgh is proposed to capture local journeys at Chattenden, Wainscott and Frindsbury as an alternative to the express BRT service.
- 6.4.9. Using employment and residential trip data provided by Jacobs in October 2024, a geospatial analysis of key origins and destinations has been undertaken. Choropleth maps for trips originating from terminating at residential site HHH22 and employment site HHH35 are shown in **Appendix B**. In absence of the complete dataset for the Hoo Peninsula, these sites are used as proxies for residential and commercial development at Hoo St Werburgh respectively. Below is a summarised snapshot of this work: Figure 6.10 and Figure 6.11 show the distribution of trips originating from residential site

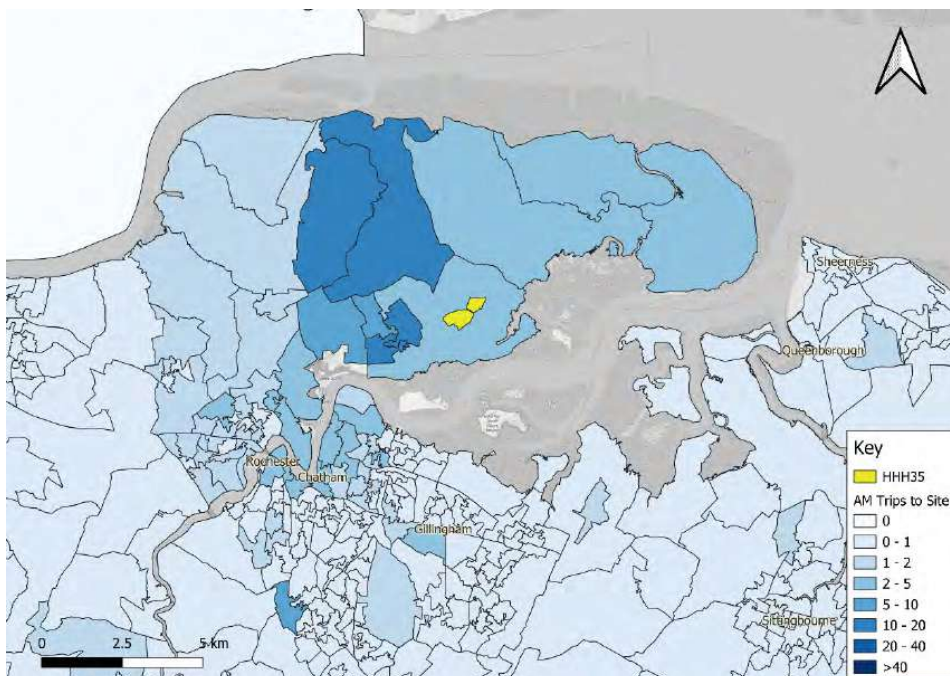
HHH22 and terminating at employment site HHH35 in the AM peak, with all permutations shown in Appendix B.

Figure 6.10: AM Residential Trips from Site



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

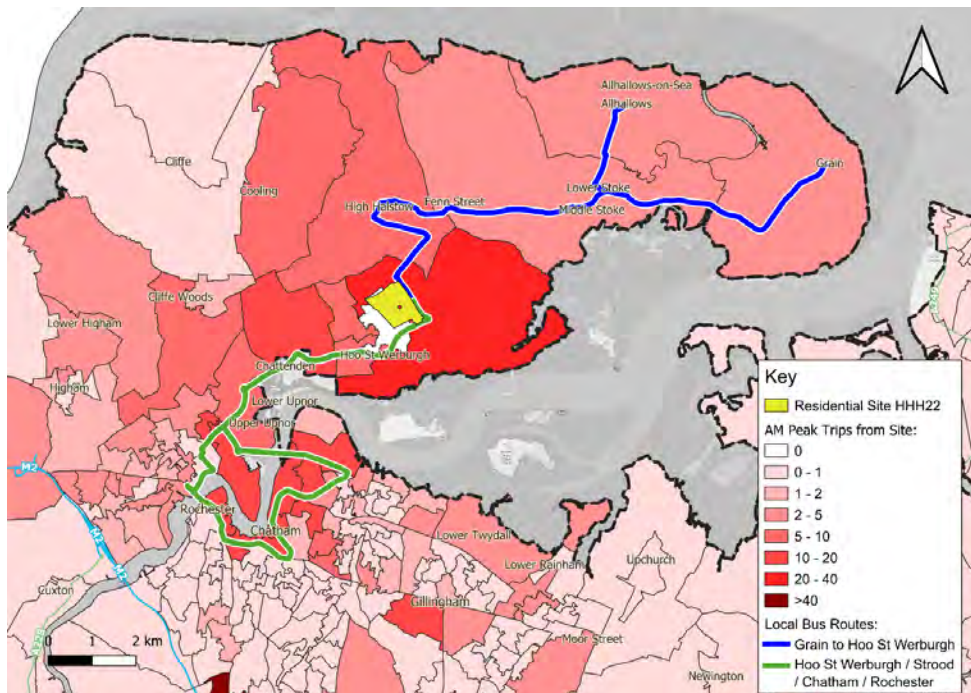
Figure 6.11: AM Employment Trips to Site



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

6.4.10. The maps show that anticipated destinations to and from the Hoo Peninsula are at Strood, Rochester and Chatham. On the Hoo Peninsula, Grain, the Stokes and Allhallows are the key trip attractors and generators. Any local bus service provided must connect into these areas in order to maximise the sustainable accessibility of the developments. This is shown in Figure 6.12, in which suggested bus routes are overlaid the residential site AM peak choropleth.

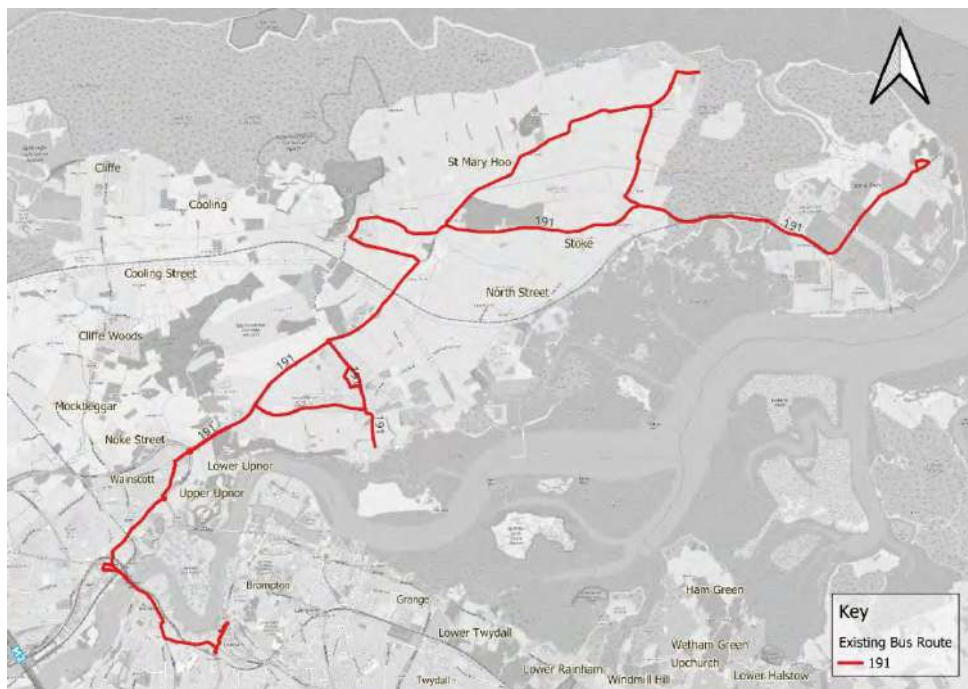
Figure 6.12: Suggested Bus Routes



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

- 6.4.11. Currently, many of these routes are served by the Arriva 191 bus service, but this does not connect into employment areas in north Chatham as seen in Figure 6.13. In the Kent Travel Model, the 191 bus service was modelled as having a high envisaged patronage. The future operation of this route must be taken into consideration. Either an enhancement of this service (through increased frequency and/or change in route to more appropriately reflect the requirements of the local population) is possible, or the addition of supplementary local bus services which provide a complimentary but alternative service.

Figure 6.13: Arriva Route 191



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

6.4.10. Embedded from the Outset

- 6.4.12. For this bus strategy to be successful, bus provision must be provided prior to development. Providing a good quality high frequency bus service prior to habit forming is the most effective method of achieving an ambitious bus patronage. Therefore, bus services must be provided at least in proportion to the scale of development during each phase of the development build out.
- 6.4.13. Additionally, developments should be designed with bus access in mind. Key destinations such as schools, GPs and shops, should be served by the bus routes. Facilities for opportunity charging for electric buses should be provided at regular intervals, including at Hoo St Werburgh, Strood, Grain and either Gravesend or Ebbsfleet.
- 6.4.14. During the construction phase, construction traffic should be minimised on bus routes with minimal road closures or diversions. Regular delays to buses during construction phase will undermine the habit-forming approach of providing an excellent service for users at point of occupation.

6.5. Sustainable Transport Interventions Summary

- 6.5.1. A multi-faceted sustainable transport strategy for the Hoo Peninsula has been developed in line with the overarching vision to achieve economically prosperous and inclusive low carbon growth on the Hoo Peninsula. This strategy includes an ambitious but achievable place-making, active travel and public transport strategy. A holistic, fully developed strategy across the Hoo Peninsula, which is embedded within development from the outset, will maximise the impact of any sustainable interventions.

7. Sustainable Transport Modelling – Fulfilled Vision

- 7.1.1. To sufficiently fulfil the core vision of economically prosperous and inclusive sustainable growth on the Hoo Peninsula, there is the opportunity and need for an ambitious and coherent sustainable transport strategy connecting key destinations across the Hoo Peninsula and beyond.
- 7.1.2. Following the successful implementation of the people-orientated sustainable transport interventions outlined, a mode share with an ambitiously reduced vehicle mode share is envisaged as achievable and realistic. For the sustainable transport vision and associated mode shares to be realised, the following is required:
- The core bus strategy is to provide the greatest opportunities for sustainable modal shift on the Hoo Peninsula. This strategy has the opportunity to connect key trip generators and attractors on the Hoo Peninsula, across wider Medway and beyond, and has the capacity to shift a substantial number of people away from private cars.
 - If co-ordinated appropriately with bus transport, rail can continue to play a large role in facilitating key journeys. This is especially pertinent for longer distance and employment-orientated trips.
 - There is a clear modelled demand for local employment trips, even before the benefits of place-making and active travel infrastructure improvements are considered. Local trips provide the opportunity for active travel modal shifts. Currently, walking has a far higher mode share than cycling on the Hoo Peninsula and so has the potential to be the primary mode for a larger number of local trips, however the cycling strategy proposed is ambitious and extensive and it is envisaged to also change the way local people travel.

7.2. Sustainable Mode Share

- 7.2.1. Considering the above, and in line with the work outlined in this STS, Table 7.1 – Table 7.2 provide a fully-justified and achievable modal share range for each type of development on the Hoo Peninsula in the AM and PM peak following the sustainable transport strategy. The anticipated change compared to the baseline mode share is shown in brackets.

Table 7.1: Anticipated AM Mode Share following Strategic Transport Interventions

	Residential	B8 Storage or Distribution	B1 Office Employment	B2 General Industrial	Flexible Employment
Cyclists	3% (+1%)	1% (+1%)	3% (+1%)	1% (+1%)	1% (+1%)
Vehicle Passengers	24% (+/-0%)	6% (+/-0%)	10% (+/-0%)	14% (+/-0%)	14% (+/-0%)
Pedestrians	19% (+6%)	5% (+4%)	17% (+4%)	13% (+5%)	13% (+5%)
Bus/Coach Passengers	10% (+6%)	4% (+4%)	19% (+3%)	8% (+5%)	8% (+5%)
Rail Passengers	8% (+3%)	3% (+2%)	8% (+2%)	4% (+3%)	4% (+3%)
Cars and M-Cycles	37% (-16%)	81% (-11%)	42% (-10%)	60% (-14%)	60% (-14%)
Total	100%	100%	100%	100%	100%

Numbers may not sum due to rounding

Table 7.2: Anticipated PM Mode Share following Strategic Transport Interventions

	Residential	B8 Storage or Distribution	B1 Office Employment	B2 General Industrial	Flexible Employment
Cyclists	3% (+1%)	2% (+1%)	3% (+1%)	1% (+1%)	1.1% (+1%)
Vehicle Passengers	26.6% (+/- 0%)	1% (+/- 0%)	4% (+/- 0%)	10% (+/- 0%)	9.9% (+/- 0%)
Pedestrians	14% (+5%)	10% (+4%)	12% (+4%)	10% (5%)	9.6% (+5%)
Bus/Coach Passengers	10% (+5%)	5% (+4%)	15% (+3%)	6% (+4%)	6.2% (+4%)
Rail Passengers	7% (+3%)	2% (+2%)	9% (+2%)	3% (+3%)	3.2% (+3%)
Cars and M-Cycles	39% (-14%)	80% (-11%)	58% (-10%)	70.0% (-13%)	70.0% (-13%)
Total	100%	100%	100%	100%	100%

Numbers may not sum due to rounding

7.2.2. This was agreed by NH as an achievable and ambitious sustainable mode share in February 2025.

7.3. Sustainable Mode Share Summary

7.3.1. Following this sustainable transport strategy, an ambitious but achievable sustainable mode share has been outlined. It is concluded that a residential mode share shift of 16% (in the AM Peak) and 14% (in the PM Peak) away from car trips is achievable, with similar car reductions of 10-14% achievable for employment uses.

7.3.2. The next step is for MC to implement these sustainable modal shifts within their strategic modelling.

8. Realised Vision for the Hoo Peninsula

8.1.1. This chapter details the everyday, tangible impact of the realisation of the vision for the Hoo Peninsula following the implementation of the realistic but ambitious sustainable transport strategy.

8.2. Daily Life on the Hoo Peninsula

- 8.2.1. Some typical journeys have been considered for how people might move around the Peninsula on an average day.
- **Primary School Children** – Primary Schools should be located at accessible destinations with streets which allow people to walk / cycle to the school on low car routes. Walking and cycling “buses” could be located at strategic points (including at any interchanges) to create a safe and easy way for pupils to travel to school, without the need for dropping up / picking up from outside the school gates. A notable example might be a ‘walking bus’ that is located at an interchange allowing a single trip for the parent to the interchange where the child is collected and the parent can make their onward journey by another mode.
 - **Destinations for young families** – It is envisaged that a number of play and open spaces will be provided as part of new developments with good walk / cycle links for access by young families.
 - **Mobility Challenged** – Blue badge will need to be accommodated on street within 50m of residential blocks to allow those with mobility issues access to transport.
 - **Out of City Commuters** – Improved routes down to the station via an improved bus network will afford people the choice to commute to work via sustainable options. For those who require a vehicle, there is an option to drive to work if the resident owns and needs a car.
 - **Retail Trips** – New retail facilities will need to be provided on the Peninsula to avoid the need for people to travel from the Peninsula for shopping trips.

8.3. Resulting Public Transport Provision

- 8.3.1. Based on the above mode shares, this section summarises the public transport provision that would be required to accommodate such an ambitious public transport modal share. The following points and assumptions should be noted and are sought for agreement:
- These resulting bus requirements relate only to the additional public transport trips by the proposed developments. This does not consider the increase in patronage due to modal shift by existing residents and employees on the Hoo Peninsula and wider Medway.
 - This is the most sustainable transport scenario. Bus capacity requirements has been considered for all bus and rail passengers from the proposed developments.
 - The calculations are based on a planning occupancy on 75 passengers per bus. This is sought for agreement with MC and local bus operators.
 - The overall required bus capacity has been calculated based on the modal shares outlined previously. At this stage, it does not consider the split between local and BRT routes.
- 8.3.2. Calculations have been split into employment and residential trips for both AM and PM peaks. In the AM peak, departure trips are taken as leaving the Hoo Peninsula and arrival trips are taken as arriving onto the Hoo Peninsula; the inverse is true in the PM peak. Alleviating congestion at the Four Elms roundabout at the southern end of the Hoo Peninsula is a primary indicator on the realising low carbon growth on the Hoo Peninsula, therefore this methodology provides a rigorous assessment of the transport conditions.
- 8.3.3. Using the modal trips rates provided in Table 7.1 and Table 7.2, a minimum bus provision has been calculated. and is summarised in Table 8.1 for the AM and PM peak hours. This is the final bus provision required for the entire built out development on the Hoo Peninsula; in reality a phased public transport approach will be required to match the phased build out of the developments on the Hoo Peninsula.

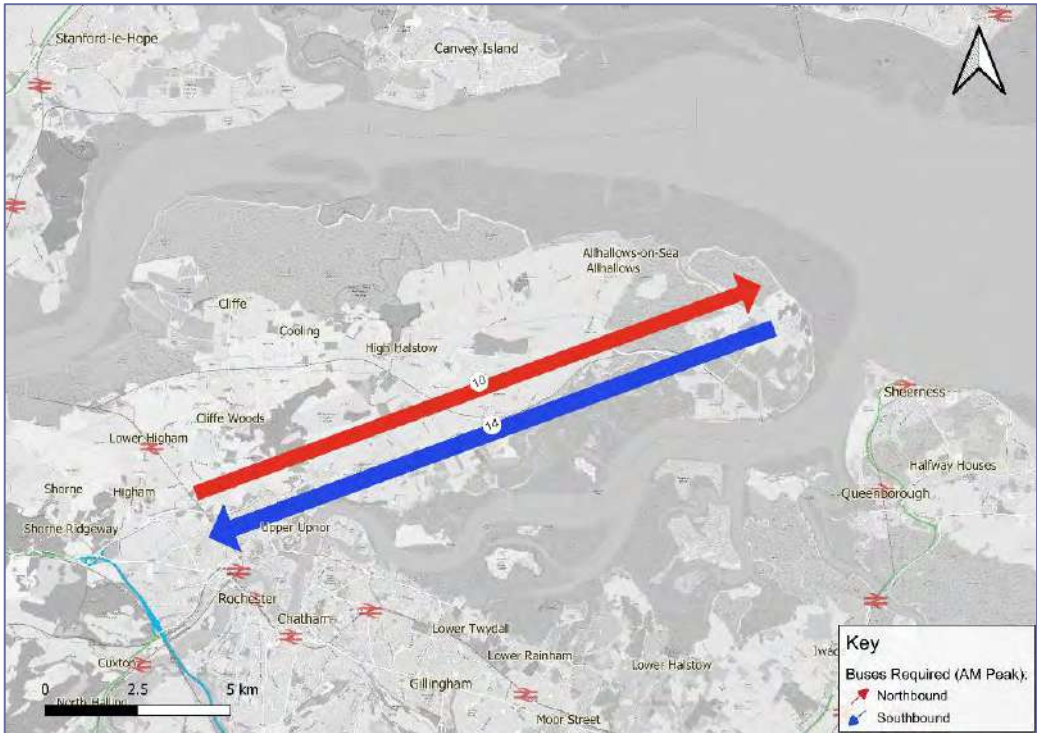
Table 8.1: Minimum Bus Requirements

Mode	Trip Generation			Bus Required per Peak Hour		
	Arrival	Departure	Total	Arrival	Departure	Total
AM Peak						
Residential	214	820	1033	3	11	14
Employment	511	175	685	7	3	10
AM Total				10	14	
PM Peak						
Residential	678	272	951	10	4	12
Employment	78	250	327	2	4	6
PM Total				12	8	

Source: Pell Frischmann Calculations. Numbers may not sum due to rounding

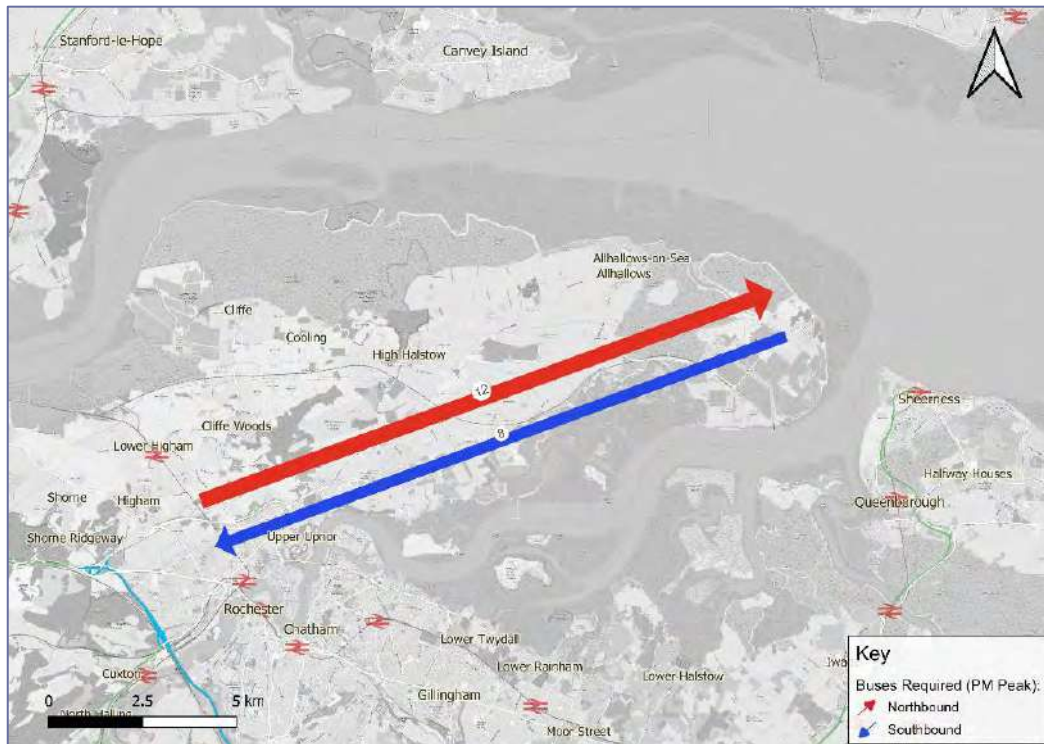
8.3.4. This results in the following bus transport vision for the AM and PM peak.

Figure 8.1: AM Peak Hour Bus Requirements



Source: OpenStreetMap contributors with Pell Frischmann annotations

Figure 8.2: PM Peak Hour Bus Requirements



Source: OpenStreetMap contributors with Pell Frischmann annotations

- 8.3.5. The above images show that a balanced and reasonable bus service can be provided to achieve the sustainable mode shares, which is advantageous for economic viability of routes.

8.3.1. Staged Bus Provision

- 8.3.6. The proposed increase in bus services could result in up to 14 additional buses operating during the morning peak period, it is important to recognise that this figure represents the projected maximum at the end of the Local Plan period, which spans approximately fifteen years. This long-term projection reflects the cumulative impact of development over time, rather than an immediate change.
- 8.3.7. The implementation of the bus strategy is expected to evolve gradually and adaptively, responding to the pace and scale of housing delivery. Rather than a fixed schedule, the rollout of new bus services will be both organic and demand-led, with services introduced incrementally as new homes are occupied. On average, this equates to less than one additional bus service per peak period per year. However, this progression will not necessarily follow a strictly linear pattern, as it will depend on actual build-out rates and the timing of infrastructure delivery.
- 8.3.8. The potential future bus provision has been discussed with the primary local operator and it has been confirmed that the number of buses set out above is achievable both in terms of available fleet and bus depot capacity.
- 8.3.9. No concerns were raised in regard to the number or frequency of buses proposed as part of the strategy.

8.4. Highway Network Impacts

- 8.4.1. Strategic network modelling is being undertaken by Jacobs to review the highway impact of development on the Hoo Peninsula; their work is currently ongoing.

9. Summary and Conclusions

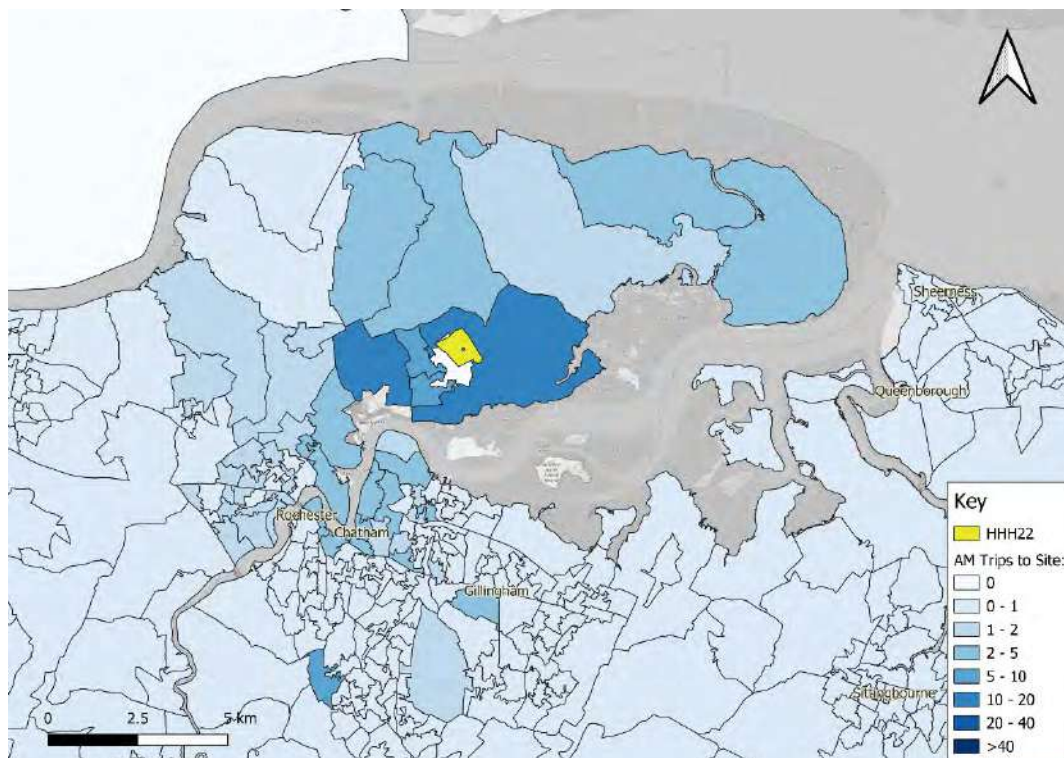
- 9.1.1. Pell Frischmann (PF) has been commissioned by the Hoo Consortium (the Client) to provide transport planning and highways consultancy services and to prepare a Sustainable Transport Strategy (STS) to accompany proposals relating to developments on the Hoo Peninsula, Medway, Kent (collectively, the 'Proposed Developments').
- 9.1.2. Medway Council (MC) is a unitary authority located in the north of Kent, encompassing the Medway towns of Strood, Chatham, Rochester, Gillingham and Rainham, in addition to the Hoo Peninsula and Isle of Grain. Medway Council is both the Local Planning Authority and the Local Highway Authority. The nearby Strategic Road Network (SRN), managed by National Highways (NH), includes the A2 (London to Dover) and the M2 (Medway to Faversham).
- 9.1.3. Whilst PF has been commissioned by the Hoo Consortium, this STS has taken a holistic, contextualised approach to sustainability and is to be applied across the Hoo Peninsula. It will inform the emerging Medway Local Plan and has been undertaken with the knowledge and in discussion with Medway Council.
- 9.1.4. This STS builds on and is supplementary to, not replacing of, previous work undertaken by MC. Namely, where previous modelling and MC's Medway Transport Model Forecast Report (MTMFR) focuses on vehicle trip generation, this STS focuses on multi-modal trip generation and considers the feasibility of sustainable modal shifts, as recommended in Paragraph 7.2 of the MTMFR.
- 9.1.5. Relevant national, regional and local transport and planning policies are summarised and have been used to inform the creation of this document. A vision-led approach has been taken to the development of this STS.
- 9.1.6. Existing baseline public transport, active travel and highway conditions on the Hoo Peninsula and wider Medway are outlined. Although there is no railway station on the Hoo Peninsula, there are clear opportunities for current and future train travel. A number of high speed, Thameslink and regular train services are accessible from Medway to London and regional locations across Kent and the southeast. Strood Railway Station is the closest station to the Hoo Peninsula which has the clearest opportunities for train travel to/from the Hoo Peninsula due to its proximity to the Peninsula, range of existing services and the potential future bus upgrades.
- 9.1.7. A baseline mode share using previously agreed methodologies has been outlined. This is in line with work undertaken in the MTMFR.
- 9.1.8. A multi-faceted sustainable transport strategy for the Hoo Peninsula has been developed in line with the overarching vision to achieve economically prosperous and inclusive low carbon growth on the Hoo Peninsula. This strategy includes an ambitious but achievable place-making, active travel and public transport strategy. A holistic, fully developed strategy across the Hoo Peninsula, which is embedded within development from the outset, will maximise the impact of any sustainable interventions.
- 9.1.9. Following this sustainable transport strategy, an ambitious but achievable sustainable mode share has been outlined. It is concluded that a residential mode share shift of 16% (in the AM Peak) and 14% (in the PM Peak) away from car trips is achievable, with similar car reductions of 10-14% achievable for employment uses.
- 9.1.10. The everyday, tangible impact of this STS for residents and employees on the Hoo Peninsula is shown. The resulting public transport provision and the scale of bus strategy required to facilitate this strategy is detailed.

Appendix A - Multi-Modal TRICS Data

Appendix B - Geospatial Analysis

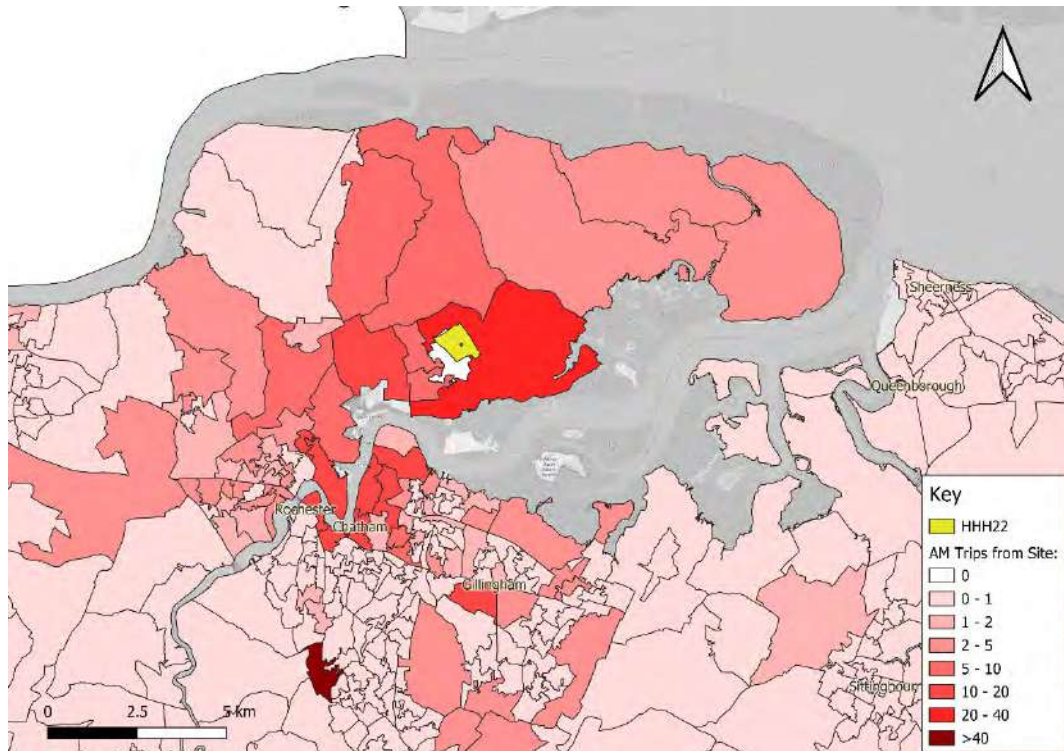
Site HHH22 – Proxy for Residential Development at Hoo St Werburgh:

Figure 9.1: AM Residential Trips to Site Choropleth



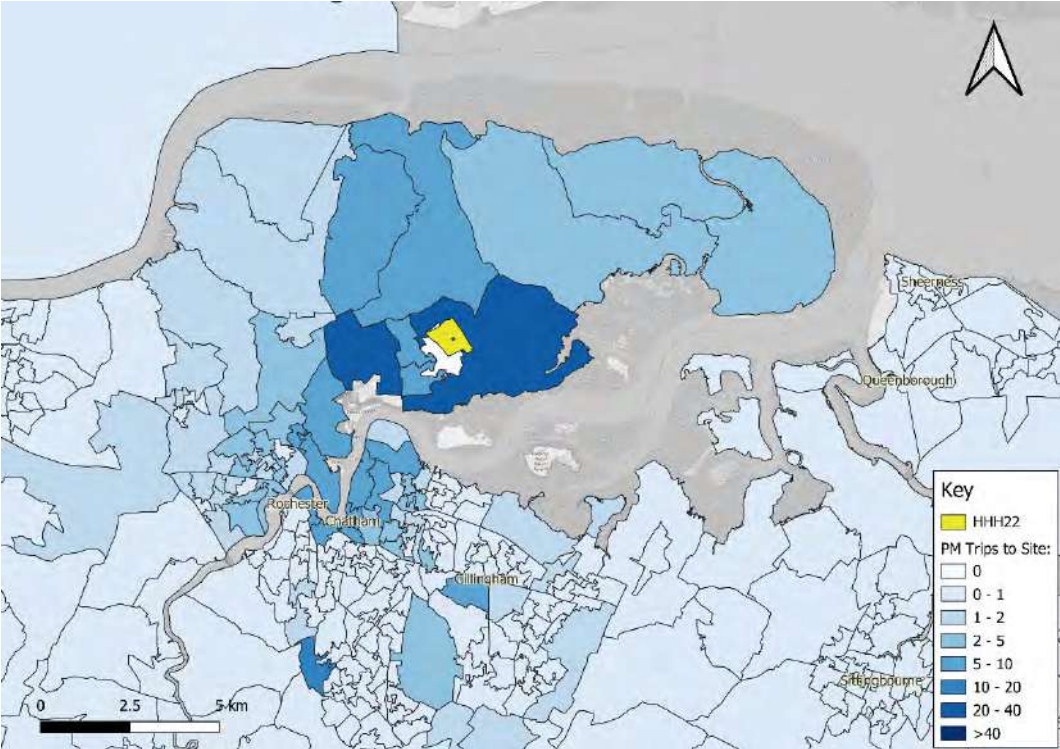
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.2: AM Residential Trips from Site Choropleth



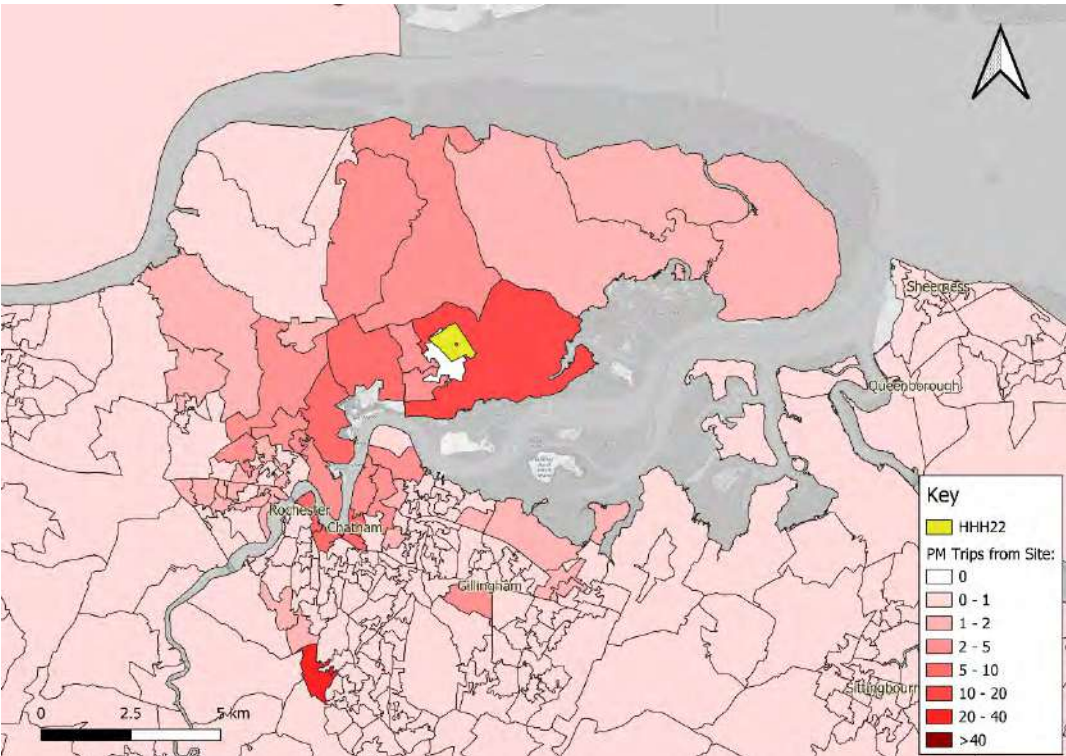
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.3: PM Residential Trips to Site Choropleth



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

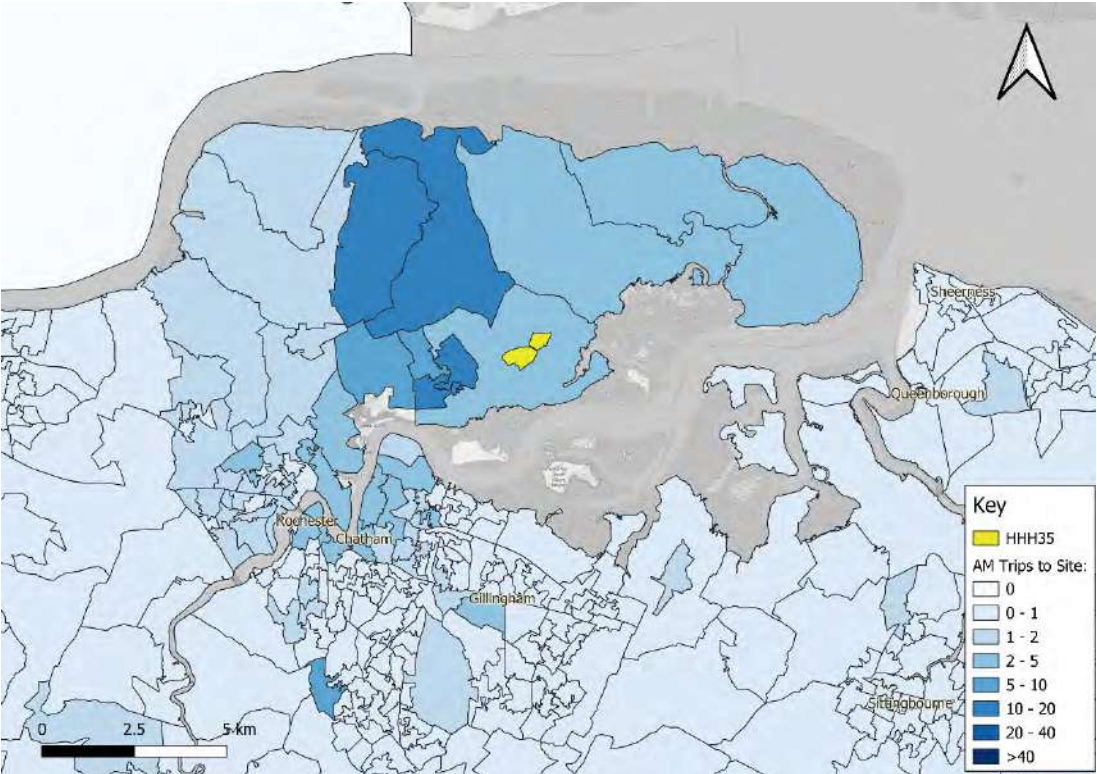
Figure 9.4: PM Residential Trips from Site Choropleth



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

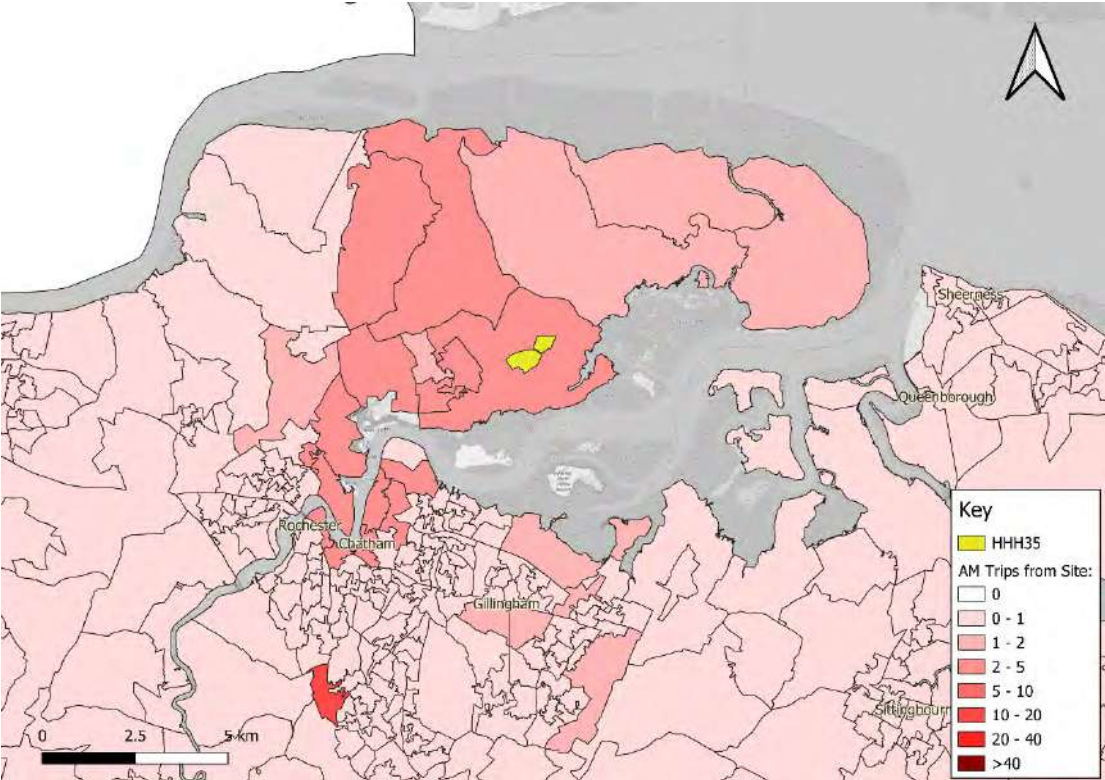
Site HHH35 – Proxy for Employment Development at Hoo St Werburgh:

Figure 9.5: AM Employment Trips to Site Choropleth



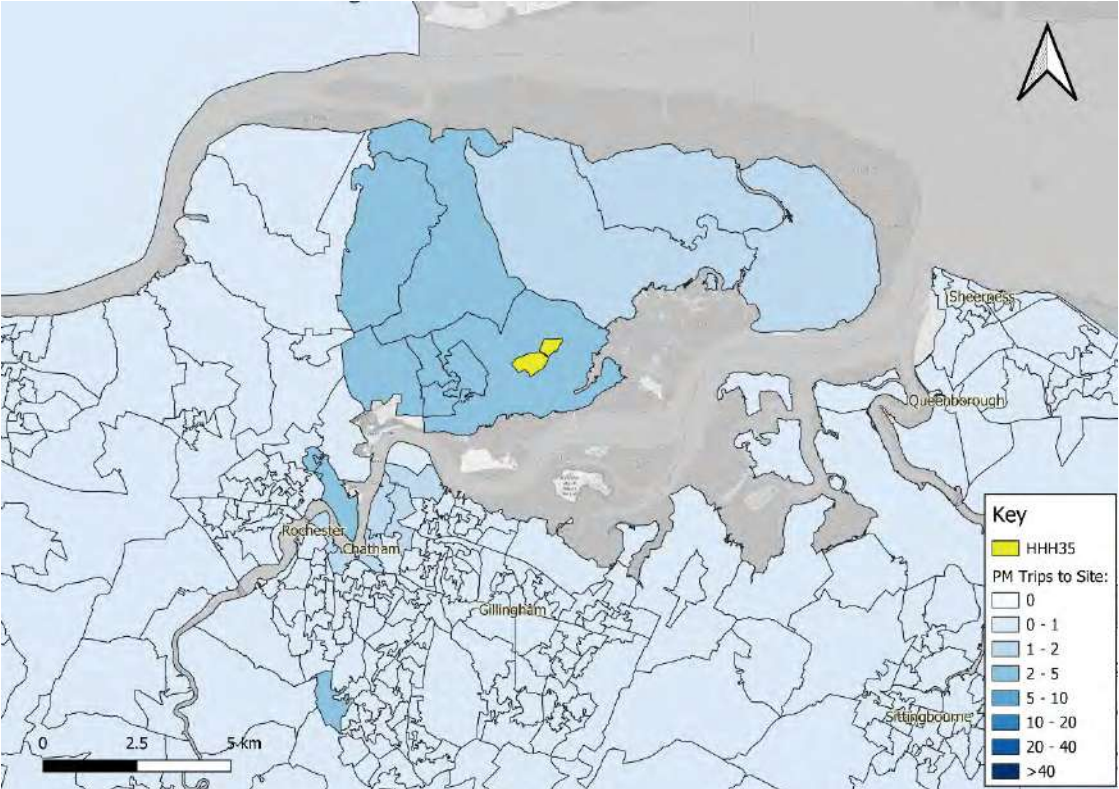
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.6: AM Employment Trips from Site Choropleth



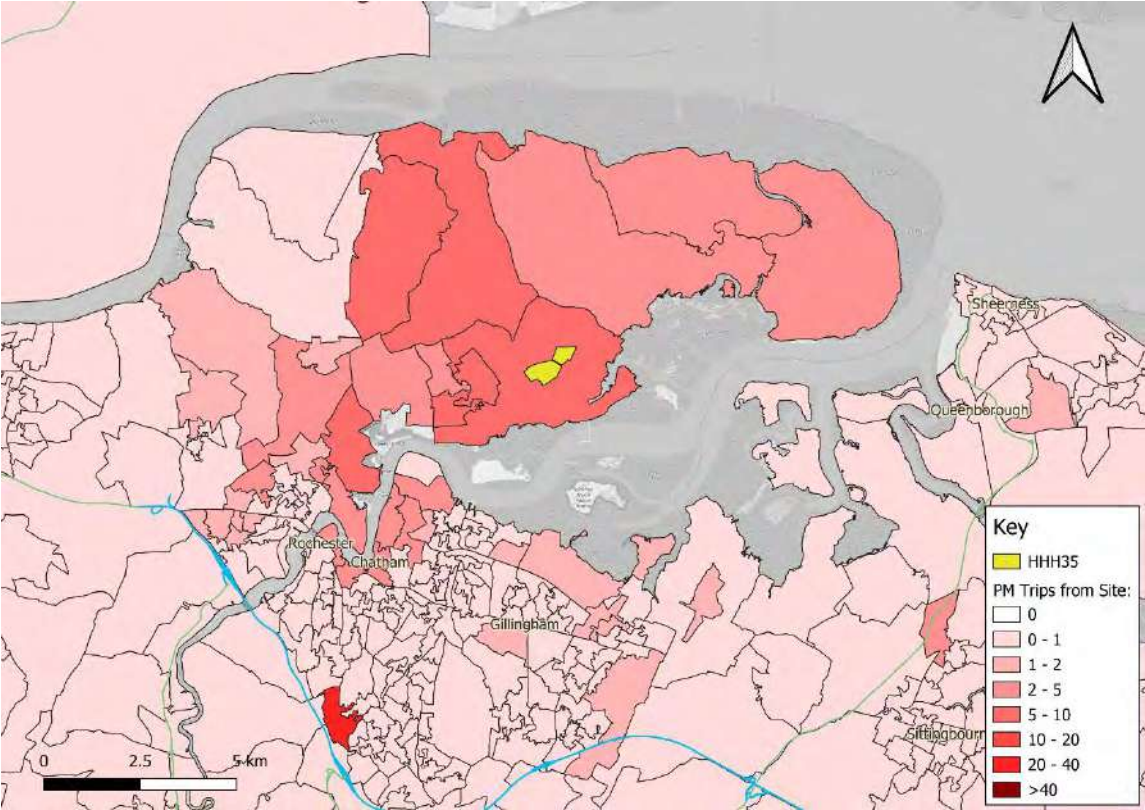
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.7: PM Employment Trips to Site Choropleth



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.8: PM Employment Trips from Site Choropleth



Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Appendix B

11 August 2025



By Email only to planning.policy@medway.gov.uk

Christian Colbeck MRICS

E [REDACTED]

33 Margaret Street W1G 0JD
savills.com

Dear Sir/Madam,

Medway Local Plan, Regulation 19 Consultation

We act for and on the behalf of the Hoo Consortium in relation to viability and write you in relation to the IDP and updated Local Plan Viability Assessment issued as part of the Regulation 19 process.

Overall, we understand the methodology and manner in which the viability assessment has been undertaken by HDH on the behalf of the Council. The approach is intended to allow for the individual assessment of the strategic sites such that assumptions and costs can be tailored to reflect those which will be incurred by each allocation. The appraisals have tested what are considered to be the upper limit of the combined infrastructure and S106 contributions which strategic allocations can provide whilst delivering a policy compliant level and mix of affordable housing.

At present, we believe that the S106 and strategic infrastructure cost estimates are high level and present a worst case. We consider the appraisals can be refined and updated alongside the IDP assessment as the infrastructure costs are refined. We submit that the IDP costs should be refined to ensure they are realistic and reflective of the market rather than comprising high level estimates.

We have reviewed both documents on the behalf of the Consortium, focusing on their landholdings and allocations situated on the Hoo Peninsula, and wish to raise the following comments and questions on their behalf.

IDP Costs

Having reviewed the IDP we note the Total Estimated Cost Low for the Hoo Peninsula and Medway Wide equates to approximately £359,992,000 and the Total Estimated Cost High for Hoo Peninsula and Medway Wide equates to £442,992,000, providing for cost variance of £83,000,000.

The Hoo Consortium instructed Bentley Project Management to undertake a review of the IDP and assess the cost of the five major highway projects and all education projects situated on the Hoo Peninsula with Bentley concluding the total costs equates to £44.4m - approximately £42.5m less than the low cost estimate adopted within the IDP. This provides a cost saving of approximately £6,238 per plot meaning the total costs are £17,828 per plot less than the maximum £35,283 per plot HDH deem to be viable within their assessment.

Given the results of the Bentley assessment, the Council may wish to consider undertaking its own detailed cost assessment of the items listed in the IDP to establish their actual costs. The viability assessment should then also be updated to reflect the more accurate assessment, this will increase confidence in the Council's approach.

We note there are a total of 20 requirements listed in the IDP which are yet to be assessed with the costs stated as TBC. These items are stated to be required as either a Hoo Peninsula or Medway Wide cost which the Consortium sites may be required to contribute towards. We recommend the unknown costs are assessed and IDP finalised prior to EIP to ensure the evidence is complete. We consider some of the uncosted items to be less essential and not to comprise key infrastructure with many likely being delivered on site by developers, and can consequently be removed from the IDP.



Phasing of IDP Costs

We note the IDP does not state the timing for when each item of infrastructure requires to be delivered and therefore when the requisite contribution is required. To ensure the IDP and viability are robust we consider the timing of costs and contributions should be established. The Council can then spread the cost of infrastructure for the Peninsula on a plan wide basis. We would encourage the Council to continue working on the IDP in this context and publish an updated version prior to submission of the plan for examination.

Phasing the development of infrastructure across the Peninsula is important to ensure scheme viability but to also provide developer confidence and ensure housing schemes come forward consistently. We consider the more accurate cost estimate as undertaken by Bentley Project Management will assist in increasing developer confidence and ensure each development comes forward at an orderly and uniformed pace. We recommend the Council therefore undertake their own more detailed cost estimate of infrastructure.

From previous conversations with the Council, we understand the 6FE Secondary School for Hoo is required early in the Plan period, prior to the occupation of a sufficient number of homes which could solely fund the £40-£45m cost estimate. For items such as these, which are required early in the Plan period, 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.

Local Plan Viability Assessment

We understand the Council consider the IDP to comprise a 'live' document which will be continually updated as cost items evolve. We encourage the Council to update and publish the corresponding viability assessments as and when the IDP is fine-tuned. The Consortium's own cost analysis considers there to be circa £42.5m of costs savings from the estimates currently included in the IDP. We consider these savings will improve developer confidence and ensure development comes forward at the pace and quality the Local Plan requires.

We also wish to raise the following points which we consider should be reviewed as part of the future viability update;

Housing Numbers

Table 10.1a of the Viability Appraisal assumes 6,813 homes at Site 32. This does not appear to include the 820 homes proposed at High Halstow. Please can you confirm if High Halstow has been included in the viability assessment currently this is not clear.

1,500 plots as proposed on the Church Commissioners land are not included in the allocation / plan period, but will benefit from the development of IDP infrastructure in this location. Is it anticipated these plots will contribute towards the costs assessed within the IDP?

Infrastructure Costs

In our response to the April 25 consultation, we highlighted infrastructure costs were not included within the viability assessment and that we considered these costs should be stated over and above the 15% allowance applied to vertical build costs which are adopted at BCIS rates. We consider the 15% allowance covers external works such as gardens, driveways and other on plot costs which are excluded from the BCIS base rate (see appendix 2 for details).

We do not consider the 15% allowance includes for site infrastructure such as Site Access, Spine Roads, Drainage, Landscaping, Open Space and Play Equipment. We consider the viability assessment requires to include specific costs in relation to the development of these items. For clarity we do not consider these costs to be 'abnormal' as they are required by all developments, a site access or estate road is as important to a development as the homes themselves. We do not consider these costs should therefore be deducted from

the Benchmark Land Value, we consider only genuine abnormal costs required, for example, by the presence of poor ground conditions, flood risk, and contamination, etc. to be abnormal.

Developer Profit

We are of the opinion that profit should reflect the nature of a project and should therefore be increased where there is a more volatile market (i.e. uncertainty around sales values and / or sales rates) or where the developer has to commit a large amount of funds up-front without an immediate pay back.

We have previously provided a copy of a report that Savills produced on the calculation of profit margins looking at a number of plc housebuilders. On the basis of this, as a minimum we would ask that the strategic sites are modelled of a profit on GDV of 20% to reflect the long-term nature of strategic development.

We further note profit within the development appraisal is purely calculated as a percentage of private and affordable GDV at cells P35 and P36. The payment of profit is not included within the development cashflow, and is primarily considered as the funds remaining at the end of the cashflow when all revenue is received and all costs paid, therefore neither an IRR or ROCE is calculated. We consider these metrics to comprise important measures of profit for large scale strategic sites, which most developers adopt to assess the viability of a scheme which will take many years to complete, as these measures not only look at the total level of profit achieved, but also the time in which the profit is received. Whilst we appreciate these metrics are not a specific consideration of the viability PPG, to ensure a robust plan is presented at EIP we consider these other metrics could also be adopted for the strategic sites to show the impact and timing of the IDP costs on the allocations has been fully considered.

We thank you for this opportunity to provide our thoughts in relation to the IDP and Local Plan Viability assessment and hope you find our representations helpful. Should you have any questions please don't hesitate to ask.

Yours sincerely



Christian Colbeck MRICS
Director
Strategic Development

Appendix 1

Project Description	Project Type	Location	Estimated Cost - Low
SN5-3-M2 J4	Highways	Medway wide	TBC
Extended bus services (including to Hoo)	Transport - Other	Medway wide	TBC
Strategic Flood Risk Mitigations	Green & Blue Infrastructure	Medway wide	TBC
Sewerage network infrastructure	Utilities & Waste	Medway wide	N/A
Wastewater treatment infrastructure	Utilities & Waste	Medway wide	N/A
New Hoo St Werburgh Sports Centre redevelopment	Community & Cultural Facilities	Hoo Peninsula	TBC
Upgrades to Deangate	Community & Cultural Facilities	Hoo Peninsula	TBC
Integrated Community Hub	Community & Cultural Facilities	Hoo Peninsula	TBC
Hoo Visitor Centre	Community & Cultural Facilities	Hoo Peninsula	TBC
Signage, wayfinding & heritage interpretation		Medway wide / Hoo Peninsula	TBC
Town Centre and urban connectivity projects Journey			
Time and Accessibility Enhancements	Transport Public Realm	Medway wide	TBC
Open Space		Medway wide	TBC
Parks and Gardens		Medway wide	TBC
Allotments		Medway wide	TBC
Play		Medway wide	TBC
Youth		Medway wide	TBC
Natural greenspace		Medway wide	TBC
Football increased demand		Medway wide	TBC
Cricket		Medway wide	TBC
Hockey		Medway wide	TBC
Rugby		Medway wide	TBC
Tennis		Medway wide	TBC

Appendix 2



AVERAGE PRICES RESULTS NOTES AND DEFINITIONS

21-Jun-2022

Introduction

This page shows a summary of the results from the selected categories. More detailed results (including graphs), can be found by clicking on a category.

Prices

In all studies, the prices are exclusive of External works, Contingencies, Fees, VAT, Finance charges and the like. They are based on the agreed price for construction so will include the constructors profit and overheads. The £/m², Functional unit and Group element prices studies all show costs with Preliminaries apportioned by cost. The Element cost per m² and Element unit rate studies show rates exclusive of Preliminaries. For this reason, the average prices shown for equivalent elements in the Group element prices and Element cost per m² studies will be different.

Appendix C

DESCRIPTION OF THE WORKS	SUMMARY			COMMENTS
	BENTLEY £	JACOBS £	DIFFERENCE £	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	7,413,200	4,128,000	(3,285,200)	Overall, Bentley feel that Jacobs' prelim allowance appear low for the requirement of the junctions. Bentley would query the level of earthworks requirements on these junctions.
MEASURED WORKS	20,838,306	50,609,778	29,771,472	
WORKS TOTAL	28,251,506	54,737,778	26,486,272	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE	1,977,605	4,379,022	2,401,417	
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	30,229,111	59,116,800	28,887,689	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES	3,022,911	Excluded	(3,022,911)	Jacobs appear to have made no allowance for this within their summary. Bentley have excluded this from our Cost Plan.
CONSULTANCY SERVICES: FEE	3,778,639	10,947,556	7,168,917	
RISK/CONTINGENCY ALLOWANCE	7,406,132	21,895,111	14,488,979	
OPTIMISM BIAS	Excluded	17,516,089	17,516,089	
TOTAL	44,436,793	109,475,556	65,038,763	
*Note: All figures exclude VAT.				

DESCRIPTION OF THE WORKS	MAIN ROAD HOO			COMMENTS
	BENTLEY £	JACOBS £	DIFFERENCE £	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	1,534,000	960,000	(574,000)	Bentley have priced this on an assumed 40-week programme. Jacobs have not provided detail on how their figure is calculated.
MEASURED WORKS	4,277,109	3,452,095	(825,014)	Bentley have priced this element based on the assumptions included within the Cost Plan. Jacobs have not provided their assumptions and exclusions at this stage, so we are unable to confirm this.
WORKS TOTAL	5,811,109	4,412,095	(1,399,014)	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE @ 7%	406,778	352,968	(53,810)	Bentley have allowed a 7% fee on the Works Total, whereas Jacobs have allowed 8%.
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	6,217,886	4,765,063	(1,452,824)	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES @ 10%	621,789	Excluded	(621,789)	Bentley have allowed 10% of the Construction Value for local authority bonds, supervision and inspection fees. Jacobs appear to have made no allowance for this.
CONSULTANCY SERVICES: FEE @ 12.5%	777,236	882,419	105,183	Bentley have allowed 12.5% of the Construction Value for Consultancy Fees, whereas Jacobs have allowed a 20% allowance.
RISK/CONTINGENCY ALLOWANCE @ 20% OF TOTAL	1,523,382	1,764,838	241,456	Bentley have allowed a 20% contingency pot, whereas Jacobs have allowed 25%.
OPTIMISM BIAS	Excluded	1,411,870	1,411,870	Bentley have made no allowance for Optimism Bias at this stage, whereas Jacobs have included a 25% allowance.
TOTAL	9,140,293	8,824,190	(316,103)	
*Note: All figures exclude VAT.				

DESCRIPTION OF THE WORKS	BELL'S LANE			COMMENTS
	BENTLEY £	JACOBS £	DIFFERENCE £	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	74,100	480,000	405,900	Bentley have priced this on an assumed 8-week programme. Jacobs have not provided detail on how their figure is calculated, however Bentley feel Jacobs' allowance is excessive for the level of work on this junction.
MEASURED WORKS	137,867	159,633	21,766	Bentley have priced this element based on the assumptions included within the Cost Plan. Jacobs have not provided their assumptions and exclusions at this stage, so we are unable to confirm this.
WORKS TOTAL	211,967	639,633	427,666	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE @ 7%	14,838	51,171	36,333	Bentley have allowed a 7% fee on the Works Total, whereas Jacobs have allowed 8%.
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	226,805	690,804	463,999	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES @ 10%	22,680	Excluded	(22,680)	Bentley have allowed 10% of the Construction Value for local authority bonds, supervision and inspection fees. Jacobs appear to have made no allowance for this.
CONSULTANCY SERVICES: FEE @ 12.5%	28,351	127,927	99,576	Bentley have allowed 12.5% of the Construction Value for Consultancy Fees, whereas Jacobs have allowed a 20% allowance.
RISK/CONTINGENCY ALLOWANCE @ 20% OF TOTAL	55,567	255,853	200,286	Bentley have allowed a 20% contingency pot, whereas Jacobs have allowed 25%.
OPTIMISM BIAS	Excluded	204,683	204,683	Bentley have made no allowance for Optimism Bias at this stage, whereas Jacobs have included a 25% allowance.
TOTAL	333,403	1,279,267	945,864	
*Note: All figures exclude VAT.				

DESCRIPTION OF THE WORKS	ROPER'S LANE			COMMENTS
	BENTLEY £	JACOBS - OP 1 £	DIFFERENCE £	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	212,100	576,000	363,900	Bentley have priced this on an assumed 15-week programme. Jacobs have not provided detail on how their figure is calculated, however Bentley feel Jacobs' allowance is excessive for the level of work on this junction.
MEASURED WORKS	312,960	321,207	8,248	Bentley have priced this element based on the assumptions included within the Cost Plan. Jacobs have not provided their assumptions and exclusions at this stage, so we are unable to confirm this.
WORKS TOTAL	525,060	897,207	372,148	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE @ 7%	36,754	71,777	35,022	Bentley have allowed a 7% fee on the Works Total, whereas Jacobs have allowed 8%.
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	561,814	968,984	407,170	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES @ 10%	56,181	Excluded	(56,181)	Bentley have allowed 10% of the Construction Value for local authority bonds, supervision and inspection fees. Jacobs appear to have made no allowance for this.
CONSULTANCY SERVICES: FEE @ 12.5%	70,227	179,441	109,215	Bentley have allowed 12.5% of the Construction Value for Consultancy Fees, whereas Jacobs have allowed a 20% allowance.
RISK/CONTINGENCY ALLOWANCE @ 20% OF TOTAL	137,644	358,883	221,238	Bentley have allowed a 20% contingency pot, whereas Jacobs have allowed 25%.
OPTIMISM BIAS	Excluded	287,106	287,106	Bentley have made no allowance for Optimism Bias at this stage, whereas Jacobs have included a 25% allowance.
TOTAL	825,866	1,794,414	968,548	

*Note: All figures exclude VAT.

DESCRIPTION OF THE WORKS	SANS PAREIL ROUNDABOUT			COMMENTS
	BENTLEY £	JACOBS £	DIFFERENCE £	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	2,399,000	960,000	(1,439,000)	Bentley have priced this on an assumed 45-week programme. Jacobs have not provided detail on how their figure is calculated, however Bentley feel Jacobs' allowance is low for the level of work on this junction.
MEASURED WORKS	5,716,228	14,220,946	8,504,717	Bentley have priced this element based on the assumptions included within the Cost Plan. Jacobs have not provided their assumptions and exclusions at this stage, so we are unable to confirm this. On review of Jacobs' high level summary, they have included a circa £8.5m allowance for earthworks and Bentley would query whether this level of earthworks is required in this area.
WORKS TOTAL	8,115,228	15,180,946	7,065,717	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE @ 7%	568,066	1,214,476	646,410	Bentley have allowed a 7% fee on the Works Total, whereas Jacobs have allowed 8%.
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	8,683,294	16,395,421	7,712,127	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES @ 10%	868,329	Excluded	(868,329)	Bentley have allowed 10% of the Construction Value for local authority bonds, supervision and inspection fees. Jacobs appear to have made no allowance for this.
CONSULTANCY SERVICES: FEE @ 12.5%	1,085,412	3,036,189	1,950,777	Bentley have allowed 12.5% of the Construction Value for Consultancy Fees, whereas Jacobs have allowed a 20% allowance.
RISK/CONTINGENCY ALLOWANCE @ 20% OF TOTAL	2,127,407	6,072,378	3,944,971	Bentley have allowed a 20% contingency pot, whereas Jacobs have allowed 25%.
OPTIMISM BIAS	Excluded	4,857,903	4,857,903	Bentley have made no allowance for Optimism Bias at this stage, whereas Jacobs have included a 25% allowance.
TOTAL	12,764,442	30,361,891	17,597,449	

*Note: All figures exclude VAT.

DESCRIPTION OF THE WORKS	FOUR ELMS ROUNDABOUT			COMMENTS
	BENTLEY	JACOBS	DIFFERENCE	
	£	£	£	
	TOTAL	TOTAL	TOTAL	
PRELIMINARIES	3,194,000	1,152,000	(2,042,000)	Bentley have priced this on an assumed 60-week programme. Jacobs have not provided detail on how their figure is calculated, however Bentley feel Jacobs' allowance is low for the level of work on this junction.
MEASURED WORKS	10,394,142	32,455,897	22,061,755	Bentley have priced this element based on the assumptions included within the Cost Plan. Jacobs have not provided their assumptions and exclusions at this stage, so we are unable to confirm this. On review of Jacobs' high level summary, they have included a circa £20m allowance for earthworks and Bentley would query whether this level of earthworks is required in this area.
WORKS TOTAL	13,588,142	33,607,897	20,019,755	
MAIN CONTRACTOR'S OVERHEADS & PROFIT: FEE @ 7%	951,170	2,688,632	1,737,462	Bentley have allowed a 7% fee on the Works Total, whereas Jacobs have allowed 8%.
CONSTRUCTION VALUE (INCLUDING OH&P AND ECI)	14,539,312	36,296,529	21,757,217	
LOCAL AUTHORITY - BONDS, SUPERVISION, INSPECTIONS FEES @ 10%	1,453,931	Excluded	(1,453,931)	Bentley have allowed 10% of the Construction Value for local authority bonds, supervision and inspection fees. Jacobs appear to have made no allowance for this.
CONSULTANCY SERVICES: FEE @ 12.5%	1,817,414	6,721,579	4,904,165	Bentley have allowed 12.5% of the Construction Value for Consultancy Fees, whereas Jacobs have allowed a 20% allowance.
RISK/CONTINGENCY ALLOWANCE @ 20% OF TOTAL	3,562,131	13,443,159	9,881,027	Bentley have allowed a 20% contingency pot, whereas Jacobs have allowed 25%.
OPTIMISM BIAS	Excluded	10,754,527	10,754,527	Bentley have made no allowance for Optimism Bias at this stage, whereas Jacobs have included a 25% allowance.
TOTAL	21,372,788	67,215,794	45,843,005	

*Note: All figures exclude VAT.

BENTLEY



PROPOSED EDUCATION COSTS, MEDWAY

Benchmark Analysis & Cost Estimate

for

The Church Commissioners for England, Dean Lewis Estates, Redrow and Taylor Wimpey

Discovery House
Mere Way
Ruddington Fields Business Park
Ruddington
Nottingham
NG116JW

Development Management | Cost Management | Project Management
0115 983 0157
www.bentleyprojectmanagement.co.uk

Version	Date	Author	Comments
1	06 August 2025	T. Mascari	First Issue

PROPOSED EDUCATION CONTRIBUTIONS, HOO PENINSULA
BENCHMARK ANALYSIS
JULY 2025
EXPANSION BY 1FE



BENCHMARK ANALYSIS

	MEDWAY (£/m2)	BCIS (£/m2)	NSB (NET) (£/m2)	NSB (GROSS) (£/m2)
1 Base build		£2,882	£3,435	£4,419
2 Uplift for 2023 Building Regulations - allowance		£200	£200	£200
3 External Works and Drainage		£700	£700	inc
4 Preliminaries		inc	inc	inc
5 Main Contractor's Overheads & Profit		inc	inc	inc
SUB TOTAL PER m2		£3,782	£4,335	£4,619
SUB TOTAL		£3,782,000	£4,335,000	£4,620,000
5 Professional Fees (12.5%)		£473	£542	inc
6 Other Fees, Surveys, Reports etc (2.5%)		£95	£108	inc
7 Contingency / Risk Allowance (10%)		£435	£499	inc
8 Allowance for loose furniture and ICT (based on £300,000)		£300	£300	£300
TOTAL PROJECT COST PER m2		£5,084	£5,784	£4,919
TOTAL PROJECT COST	£10,000,000	£5,085,000	£5,784,000	£4,920,000
TOTAL PER PLACE (based on 210 places)	£47,619	£24,214	£27,543	£23,429

Notes

- * All figures exclude VAT
- * No allowance made for inflation / indexation beyond 3rd Quarter 2025
- * Gross Internal Floor Area (GIFA) based on the floor area 1,000m2. This is based on the additional area from a 1FE to 2FE school as per the average 'gross area' area from 'Building Bulletin 103 - June 2014 - Area Guidelines for Mainstream Schools'. This is indicative, subject to design advice and does not include for Early Years provision.
- * BCIS Base build cost is the median figure for new horizontal extensions to Primary Schools (refer to Appendix A).
- * National Schools Benchmarking figure is taken from the July '22 (v.16) publication - 'Rebuild & Extension Summary'. We have used the average 'Gross Cost per m2' for works up to 1,500m2 in size.
- * All costs above rebased to Q3 2025 and to the Medway area using BCIS 'All in Tender Price Index' and 'Location Factor'
- * Contingency allowance of 10% included.
- * Allowance of £700/m2 is included for external works based on internal benchmark data. The extent of works is unknown at this stage.

PROPOSED EDUCATION CONTRIBUTIONS, HOO PENINSULA
BENCHMARK ANALYSIS
JULY 2025
NEW 2FE PRIMARY SCHOOL



BENCHMARK ANALYSIS

	MEDWAY (£/m2)	BCIS (£/m2)	NSB (NET) (£/m2)	NSB (GROSS) (£/m2)
1 Base build		£3,128	£2,691	£4,249
2 Uplift for 2023 Building Regulations - allowance		£200	£200	£200
3 External Works and Drainage		£900	£900	inc
4 Preliminaries		inc	inc	inc
5 Main Contractor's Overheads & Profit		inc	inc	inc
SUB TOTAL PER m2		£4,228	£3,793	£4,449
SUB TOTAL		£9,302,000	£8,345,000	£9,789,000
5 Professional Fees (12.5%)		£529	£474	inc
6 Other Fees, Surveys, Reports etc (2.5%)		£106	£95	inc
7 Contingency / Risk Allowance (10%)		£486	£436	inc
8 Allowance for loose furniture and ICT (based on £500,000)		£227	£227	£227
TOTAL PROJECT COST PER m2		£5,576	£5,025	£4,676
TOTAL PROJECT COST	£12,000,000	£12,267,000	£11,056,000	£10,289,000
TOTAL PER PLACE (based on 420 places)	£28,571	£29,207	£26,324	£24,498

Notes

- * All figures exclude VAT
- * No allowance made for inflation / indexation beyond 3rd Quarter 2025
- * Gross Internal Floor Area (GIFA) based on the floor area 2,200m2. This is based on average 'gross area' area from 'Building Bulletin 103 - June 2014 - Area Guidelines for Mainstream Schools'. This is indicative, subject to design advice and does not include for Early Years provision.
- * BCIS Base build cost is the median figure for new build Primary Schools over 2,000m2 (refer to Appendix A).
- * National Schools Benchmarking figure is taken from the July '22 (v.16) publication - 'New Development Summary'. We have used the average 'Gross Cost per m2' for works 1,500m2 - 3,000m2 in size.
- * All costs above rebased to Q3 2025 and to the Medway area using BCIS 'All in Tender Price Index' and 'Location Factor'
- * Contingency allowance of 10% included.
- * Allowance of £900/m2 is included for external works based on internal benchmark data. The extent of works is unknown at this stage.

PROPOSED EDUCATION CONTRIBUTIONS, HOO PENINSULA
BENCHMARK ANALYSIS
JULY 2025
NEW 3FE PRIMARY SCHOOL



BENCHMARK ANALYSIS

	MEDWAY	BCIS (£/m2)	NSB (NET) (£/m2)	NSB (GROSS) (£/m2)
1 Base build		£3,128	£2,939	£4,667
2 Uplift for 2023 Building Regulations - allowance		£200	£200	£200
3 External Works and Drainage		£850	£850	inc
4 Preliminaries		inc	inc	inc
5 Main Contractor's Overheads & Profit		inc	inc	inc
SUB TOTAL PER m2		£4,178	£3,989	£4,867
SUB TOTAL		£12,952,000	£12,366,000	£15,088,000
5 Professional Fees (12.5%)		£522	£499	inc
6 Other Fees, Surveys, Reports etc (2.5%)		£104	£100	inc
7 Local Authority Fees		exc	exc	exc
8 Allowance for Abnormal Groundworks (included within Serviced Land Cost Plan)		exc	exc	inc
9 Contingency / Risk Allowance (10%)		£480	£459	inc
10 Allowance for loose furniture and ICT (based on £750,000)		£242	£242	£242
TOTAL PROJECT COST PER m2		£5,527	£5,288	£5,109
TOTAL PROJECT COST	£20,000,000	£17,135,000	£16,393,000	£15,838,000
TOTAL PER PLACE (based on 630 places)	£31,746	£27,198	£26,021	£25,140

Notes

- * All figures exclude VAT
- * No allowance made for inflation / indexation beyond 3rd Quarter 2025
- * Gross Internal Floor Area (GIFA) based on the floor area 3,100m2. This is based on average 'gross area' area from 'Building Bulletin 103 - June 2014 - Area Guidelines for Mainstream Schools'. This is indicative, subject to design advice and does not include for Early Years provision.
- * BCIS Base build cost is the median figure for new build Primary Schools over 2,000m2 GFA (refer to Appendix A).
- * National Schools Benchmarking figure is taken from the July '22 (v.16) publication - 'New Development Summary'. We have used the average 'Gross Cost per m2' for works over 3,000m2 in size.
- * All costs above rebased to Q3 2025 and to the Medway area using BCIS 'All in Tender Price Index' and 'Location Factor' respectively.
- * Contingency allowance of 10% included.
- * Allowance of £850/m2 is included for external works based on internal benchmark data. The extent of works is unknown at this stage.

PROPOSED EDUCATION CONTRIBUTIONS, HOO PENINSULA
BENCHMARK ANALYSIS
JULY 2025
NEW 6FE SECONDARY SCHOOL



BENCHMARK ANALYSIS

	MEDWAY (£/m2)	BCIS (£/m2)	NSB (NET) (£/m2)	NSB (GROSS) (£/m2)
1 Base build		£3,020	£2,691	£3,960
2 Uplift for 2023 Building Regulations - allowance		£200	£200	£200
3 External Works and Drainage		£850	£850	inc
4 Preliminaries		inc	inc	inc
5 Main Contractor's Overheads & Profit		inc	inc	inc
SUB TOTAL PER m2		£4,070	£3,741	£4,160
SUB TOTAL		£29,304,000	£26,936,000	£29,951,000
5 Professional Fees (12.5%)		£509	£468	inc
6 Other Fees, Surveys, Reports etc (2.5%)		£102	£94	inc
7 Contingency / Risk Allowance (10%)		£468	£430	inc
8 Allowance for loose furniture and ICT (based on £1,000,000)		£139	£139	£139
TOTAL PROJECT COST PER m2		£5,287	£4,871	£4,299
TOTAL PROJECT COST	£45,000,000	£38,070,000	£35,074,000	£30,951,000
TOTAL PER PLACE (based on 900 places)	£50,000	£42,300	£38,971	£34,390

Notes

- * All figures exclude VAT
- * No allowance made for inflation / indexation beyond 3rd Quarter 2025
- * Gross Internal Floor Area (GIFA) based on the floor area 7,200m2. This is based on average 'gross area' area from 'Building Bulletin 103 - June 2014 - Area Guidelines for Mainstream Schools'. This is indicative, subject to design advice and does not include Post-16 provision.
- * BCIS Base build cost is the median figure for new build Secondary Schools (refer to Appendix A).
- * National Schools Benchmarking figure is taken from the July '22 (v.16) publication - 'New Development Summary'. We have used the average 'Gross Cost per m2' for works 5,000m2 - 7,500m2 in size.
- * All costs above rebased to Q3 2025 and to the Medway area using BCIS 'All in Tender Price Index' and 'Location Factor'
- * Contingency allowance of 10% included.
- * Allowance of £850/m2 is included for external works. The extent of works is unknown at this stage.

APPENDIX A - BCIS AVERAGE PRICE ANALYSIS

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 26-Jul-2025 07:30

Rebased to 3Q 2025 (403; forecast) and Medway (109; sample 23)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
New build								
712. Primary schools								
Generally (15)	3,251	1,874	2,760	3,175	3,632	8,145	143	
Up to 500m2 GFA (15)	3,310	1,880	2,837	3,224	3,574	4,729	26	
500 to 2000m2 GFA (15)	3,374	1,874	2,673	3,231	3,837	8,145	48	
Over 2000m2 GFA (15)	3,143	1,884	2,764	3,128	3,588	5,421	69	
713. Secondary schools (high schools) (15)	3,002	1,922	2,613	3,020	3,334	4,318	35	

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

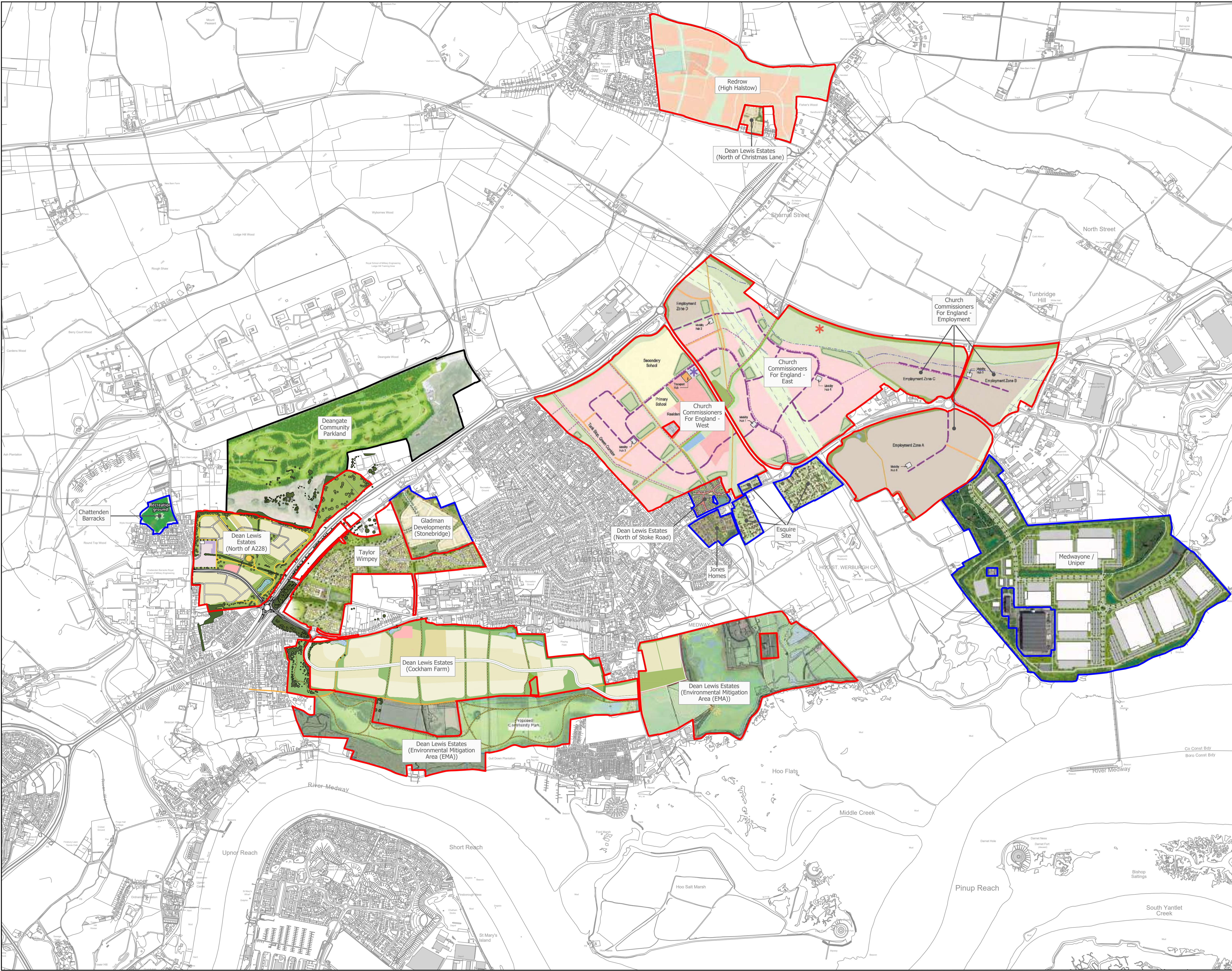
Last updated: 26-Jul-2025 07:30

Rebased to 3Q 2025 (403; forecast) and Medway (109; sample 23)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m² gross internal floor area						Sample	
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest		
Horizontal extension								
712. Primary schools (15)	2,900	1,056	2,460	2,882	3,344	4,436	60	

Appendix D



The scaling of this drawing cannot be assured

Revision	Date	Dm	Ckd
C	11.08.25	J.W.	A.J.

- Consortium Boundaries
- Other Boundaries
- Council Boundaries

Project
GREATER HOO CONSORTIUM 4

Drawing Title
COMPOSITE MASTERPLAN

Date
15.04.25

Scale
1:10,000 @A1
1:20,000 @A3

Project No
333102200

STN-GEN-SW-DR-MP-01C

Drawn by
J.W.

Check by
N.T.

Revision

0 100 200 300 400 500m

Stantec
DRAFT

Stantec UK Limited
The Blade
Abbey Square
Reading
RG1 3BE
T: 0118 9430 000
stantec.com/uk

Appendix E

Policy SA8: Hoo St Werburgh and Chattenden

Objectives

1. By 2041 Hoo St Werburgh will have strengthened its role in serving local residents and wider villages across the Hoo Peninsula. Sustainable development will provide around ~~4,700-900~~ new homes, aligned with improvements in transport, community services and facilities, retail, and new job opportunities. Growth in Chattenden will provide for 600 new homes and new and enhanced services.
2. Development will be landscape led, responding sensitively to the natural surroundings and the area's heritage.
3. The separation of Hoo and Chattenden as distinct settlements will be ~~secured through a strategic landscape corridor~~ **maintained with visual and physical coalescence avoided**.
4. Development will provide for distinctive neighbourhoods, with strong connections to the existing and new settlements.

Criteria

5. Development will come forward in **broad** accordance with ~~a strategic masterplan~~ **the Concept Masterplan (Figure 14)** for Hoo and Chattenden, providing a framework for design, landscape and green infrastructure, heritage, services, employment, transport, infrastructure, defining distinctive neighbourhoods and centres.
6. Development will be delivered in phases across the plan period, and extend beyond into the ~~2040s~~. Infrastructure delivery is linked to the phased growth, with triggers identified in the ~~Hoo Peninsula Infrastructure Plan~~.
7. Development will provide for a mix of housing, in line with Policy T2 Housing Mix and reflecting the communities' needs as evidenced in the ~~Medway Local Housing Needs Assessment, 2025, or subsequent evidence updates~~ **latest evidence of need**. The Council expects this scale of growth to meet a wide range of housing needs, including specialist provision for older people and people with disabilities, and self build and custom housing.

Centres and retail

8. Development will contribute to a network of centres across Hoo and Chattenden, with a main centre strengthening Hoo's role as a focus for services for its residents and the wider Hoo Peninsula, supported by smaller centres at neighbourhood level.
9. Land at HHH19 is allocated for the development of Deangate Retail Park, with up to 50,000 ~~sqf~~ **GIA** retail floorspace (Class Ea), principally providing for a 25,000 sqf GIA supermarket to cater for the Hoo Peninsula, with other retail and ancillary food and drink (Class Eb) of up to 7,500 sqf GIA. This will be accompanied with a new pedestrian crossing over the A228 and associated traffic calming measures, providing access to the new retail park and the wider Deangate area.
10. Land to the east of Hoo (HHH22) is identified as the preferred location for the main centre. This will provide a key destination for residents, with community services, such as health and leisure, accessible and attractive walking and cycling links, including to the new secondary school.
11. Development coming forward in the defined neighbourhoods will **broadly** align with the ~~strategic m~~ **Concept M** Masterplan and provide for a network of small centres with uses to meet daily needs of residents without adversely impacting upon existing centres, specifically the established Hoo village centre.

Commented [AJ1]: Based on the CCE trajectory, Sites HHH22 & HHH31 can deliver an additional c. 180 homes by 2041. This has been reflected in requested modifications to the table below. If the Plan period is amended in response to the HBF comments, additional homes from these Sites could come forward at a rate of c. 180 homes per year to assist in meeting housing needs for additional years.

Commented [AJ2]: Peninsula Way already provides a physical barrier separating Hoo St Werburgh from Chattenden. It would also prevent the delivery of a complete 'strategic landscape corridor' in this location. Avoiding coalescence/ maintaining separation can be successfully achieved in other ways that take account of and work with the existing highway infrastructure. The appropriate response should be informed by technical assessment(s) that demonstrate its success at the application stage rather than pre-determining the approach in the site allocation without such assessments having been carried out.

Commented [AJ3]: The Hoo Consortium's preference would be to remove additional layers of policy burden/ approval and for the site allocation to seek to align development with an updated version of the Fig. 14 Concept Masterplan. As per our comments on Fig. 14, the Concept Masterplan should be updated to reflect the approved and extant planning permissions at Hoo/ Chattenden that have been informed by significant and robust technical assessment and design evolution. The Hoo Consortium has enclosed an updated version of its Composite Masterplan upon which the updated Concept Masterplan should be based.

Commented [AJ4]: The majority of homes are planned for delivery by 2041 save for Site HHH22&31 - the table below provides for up to 1,700 homes on this site but the Plan period extends to 15 + years. This requires updating to 1,880 homes to reflect the CCE trajectory and clarification to confirm that these homes are to come forward during this Plan period. This site has capacity for a ~~further~~ c. 1,320 homes beyond the Plan period.

Commented [AJ5]: The details of this are set out at Criteria 12 below. This includes many items in the Medway-wide IDP. A joined up approach will be required to ensure distinction between the two and prevent 'double counting'.

Commented [AJ6]: This aspiration and the spatial distribution thereof is supported but should be exempt from the impact assessment thresholds at draft Policy T17.

Commented [AJ7]: Should this be expressed as sq.m (GIA) for consistency with the floor area measures in the draft retail policies (Chapter 8) and evidence base documents?

Commented [AJ8]: Duplication of Criteria 8?

Infrastructure

12. Developers will be required to support the delivery of an Infrastructure Plan for Hoo and Chattenden, providing for the phased implementation of services. Development will deliver a wide range of community services and infrastructure, reflecting the needs arising from the scale of planned growth in the context of the existing village offer. This will include provision for or proportionate contributions to:

- A new six-form entry secondary school in accordance with the latest IDP.
- A new two-form entry/1 three-form entry primary school in accordance with the latest IDP.
- Relocation of Chattenden Primary School, with expansion to two-form entry in accordance with the latest IDP.
- A Healthy Living Centre
- A new community centre/hub and investment in increasing capacity in current facilities
- New indoor sports and leisure facility
- Outdoor sports and recreation facilities, including improvements to Deangate Running Track

Commented [AJ9]: A variation on the name at Criteria 6 - terminology should be consistent.

Commented [AJ10]: To recognise the ways in which different developments will contribute to the delivery of new/ upgraded community infrastructure; some may provide land and/ or buildings, others will make financial contributions.

Commented [AJ11]: Consideration will need to be given to phasing, location and access to align delivery with pupil place demand.

Transport

13. Development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport to the surrounding residential neighbourhoods and villages by providing high quality and maintained active travel routes.

14. Development will support the improvement of bus services to provide effective sustainable transport links for Hoo and surrounding villages, with consideration of expansion of ~~fast track bus services~~ Bus Rapid Transit (or similar) linked to the urban area. Land will be safeguarded to the east of Hoo for a future potential use of the freight line for passenger traffic.

15. In addition to site specific transport requirements, developers will assess impacts on the following junctions and, if required, contribute provide proportionate contributions to the delivery of highways mitigations ~~to provide capacity to accommodate growth~~ at:

- a. Four Elms roundabout
- b. Main Road, Hoo, junction with A228
- c. Dux Court Road/Bells Lane junction with A228
- d. Ropers Lane junction with A228

Commented [AJ12]: Fasttrack is a good example of BRT but this is a specific service provider rather than a type of service so suggest amending to BRT which could be run by any (or any combination) of operators.

Commented [AJ13]: A release point for the safeguarding should be included so as not to slow/ hinder progress on bringing forward the affected sites.

Commented [AJ14]: The optimum approach to highway improvements may change over time, not least in light of draft Policy DM15. The site allocation should not predetermine that capacity improvements will be required. The approach needs to be CIL Regs compliant with developments only required to mitigate identified impacts.

Environment and heritage

16. Development will be landscape led. Growth will be directed within a strategic environmental framework that will define the outward development of Hoo and Chattenden. This will provide an effective buffer to sensitive habitats and connect people to the countryside and coast. The strategy will provide opportunities for sustainable drainage measures to enhance the place-making and character of new development, and provide an integrated approach to the delivery of BNG and strategic mitigation.

17. 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.

18. ~~Along with the strategic masterplan development framework,~~ Historic England England's 'Hoo Peninsula Historic Landscape Project' should be referred to in all

Commented [AJ15]: Is this the 'strategic masterplan' referred to at Criteria 5 and 11? Suggest deletion with the focus of this criteria being on utilising the historic environment to inform place-specific development proposals.

~~relevant~~ applications to ~~demonstrate-inform~~ an understanding of and response to the unique character of the rural area. Where appropriate, provision should be made for enhanced interpretation, particularly for WWII era sites, buried and standing.

The military heritage of the Hoo Stop Line will be reflected in green infrastructure planning.

19. A ~~strategic environmental management plan~~ will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the natural environment around Hoo and Chattenden, particularly the SPA, Ramsar sites and SSSIs. Development will contribute towards the implementation of the ~~strategic environmental programme~~ to ~~provide for sustainable development, and contribute to meeting the requirements of Policies S2 Policies S2 and S3~~. This will include ~~the delivery of:~~

- Deangate Community Parkland
- Cockham Community Parkland
- Hoo Wetlands

20. ~~There is potential to deliver a district heating network to support sustainable energy infrastructure. This will be further explored and reflected in the strategic development framework and masterplan. The potential for a heat network at Hoo shall be explored in line with Policy T41: Heat Networks.~~

Employment

21. In addition to the strategic employment sites at Kingsnorth (Policy SA14), development in Hoo and Chattenden will provide for a mix of smaller scale employment land, to provide for balanced growth. This will be located at Deangate Retail Park, east of Hoo, and in conjunction with the neighbourhood centres.

Subsequent design principles

3. ~~Medway Council and the Hoo Consortium, and wider developers will collaborate to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.~~

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
HHH5	Land east of Beacon Hill Lane	Residential	Up to 50	1-5, 6-10
HHH6	Land north-west Ratcliffe Highway, Chattenden	Residential Primary School	Up to 550	1-5, 6-10

Commented [AJ16]: The difference between this and the SEP would benefit from clarification. If this is another Peninsula-wide environmental plan/ programme, is it necessary or would it duplicate measures to be set out in the SEP?

Commented [AJ17]: For consistency with the name for the SEP pursuant to draft Policy S2.

Commented [AJ18]: To make clear that this is contributions to rather than direct delivery of the parkland/ wetland schemes.

Commented [AJ19]: Draft Policy T41 already sets out a hierarchy in respect of heat networks that developers will need to explore so it is not necessary to duplicate. Whilst in theory development of the scale proposed at Hoo could make a heat network feasible there are significant practical, logistical and viability considerations. No evidence in respect of heat networks has been published as part of the Reg 19 supporting documents. The Hoo Consortium would welcome sight of the basis for draft Policy T41 before commenting further.

Commented [AJ20]: This creates an additional layer of approvals that will add to the already significant burden of detail/ information on developments on the Hoo Peninsula and risks delay the delivery of much needed homes and infrastructure. As above, an updated version of the Fig. 14 Concept Masterplan would provide an appropriate spatial framework to which development proposals would broadly accord to achieve the vision for Hoo.

HHH8	Land west of Hoo St Werburgh	Residential and supporting commercial	Up to 450	1-5, 6-10
HHH11	Land west of Hoo, adjacent to Vidgeon Avenue	Residential	Up to 240	1-5
HHH12	Land south of Main Road, Hoo St Werburgh	Residential Community facility	Up to 1,800	1-5, 6-10, 11-15
HHH22 & HHH31	Land either side of Roper's Lane, Hoo St Werburgh	Residential Employment Secondary school Community facility Retail	Up to 700 1,880	1-5, 6-10, 11-15, 15+
HHH24	Land north of Stoke Road and east of Walnut Tree Grove, Hoo St Werburgh	Residential	Up to 85	1-5, 6-10
HHH25	Adjacent to Yew Tree Lodge land to the south of Stoke Road, Hoo	Residential	Up to 80	1-5
HHH32	Abbots Court, Hoo St Werburgh	Residential	Up to 3	1-5
HHH33	Land south of Stoke Road adjacent Jacobs Lane	Residential Community facility	Up to 330	6-10, 11-15
HHH41	Parcel south of Ratcliffe Highway, Hoo St Werburgh	Residential	Up to 25	1-5

Commented [AJ21]: As per the CCE trajectory, Sites HHH22&31 can deliver 1,880 homes during the 15 year Plan period with an additional 1,320 homes beyond 2041. This additional capacity will assist in responding to the HBF concerns regarding the Plan period and anticipated shortfall against housing needs over that time.

Commented [AJ22]: If helpful in the context of infrastructure, the homes to come forward beyond the Plan period (i.e. post-2041) could be included as a footnote but the Policy should make clear the homes within this Plan and those beyond to a total of 3,200 homes on HHH22 & HHH31.

14.10 High Halstow

- 14.10.1 High Halstow is an historic village in the centre of the Hoo Peninsula that expanded significantly in the latter half of the 20th century. The wider parish stretches across the north Kent Marshes to the Thames Estuary. The village has a rural character and setting. The village centre provides a range of services, including village halls, a primary school and pre-school, sports facilities, a shop, pub and church. It is located to the north-east of Hoo, which provides a wider range of services. Like Hoo and Chattenden, the village of High Halstow is close to important environmental sites, and has a rich history.
- 14.10.2 High Halstow Parish Council is preparing a Neighbourhood Plan which seeks to maintain the rural character of the village, secure quality design in new development, protect the natural and historic environment and maintain a vibrant distinct community. Work on the Neighbourhood Plan has included a Local Housing Needs survey and wider community consultation. This work has identified a need for housing suitable for older people to 'downsize', such as bungalows, and remain in the village community. There is also support for the provision of plots for self and custom build homes in suitable locations in the village.
- 14.10.3 This Local Plan allocates land to the east of High Halstow for a large extension to the village. This is made up of two sites which are to be planned through a comprehensive masterplan.

Commented [AJ23]: The High Halstow NP was withdrawn in 2022. It is not therefore appropriate for the LP to include this level of detail on its vision. If 'made' in the future the NP will form part of the development plan in any event. The Consortium has not been able to locate the housing needs survey in the public domain. This should not therefore be relied upon to inform LP policies at this stage.

Policy SA9: High Halstow

Objective

1. By 2041, High Halstow will have grown as a village, providing ~~up to around~~ 820 new homes, ~~land for~~ a new primary school, attractive multi-functional green infrastructure and an additional ~~local~~ centre providing commercial and community services. New development will be successfully integrated with the existing village and the surrounding countryside.

Criteria

2. Development of the two sites (HHH26 and HHH29) will be brought forward in ~~accordance with a masterplan for the combined area~~ comprehensive manner.
3. Development will be designed to successfully integrate new and existing communities in the village, through design and community facilities. Development should ensure maximum connectivity and permeability between the site and existing village, such that it is well-integrated with and becomes part of the village, optimising connectivity to ~~and the viability of~~ the village centre.
4. Development will retain the distinct identity of High Halstow as an historic village, and avoid coalescence with nearby settlements, ~~through planning for landscape buffers and interface with the countryside setting, seeking and will seek~~ opportunities to enhance landscape character.
5. Any new development should respect the village feel, should be of a high quality of design and provide defined character areas that reflect variety in house types, layout, density and landscaping.
6. 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 as evidenced in the latest~~

Commented [AJ24]: For consistency with wording/ approach of SA8.

Commented [AJ25]: The principle of comprehensive development of the two High Halstow sites is supported. However, requiring a combined masterplan adds an unnecessary layer that risks delay. Appended to these reps is a Composite Masterplan showing the extant application proposals for HHH26 and emerging proposals for HHH29 and shows the comprehensive approach taken. This is reflected in the Concept Masterplan (Fig. 14) which is sufficient in this context.

Commented [AJ26]: Improved connectivity and viability are not necessarily linked matters. Improved connectivity is supported and whilst this may assist viability through increased patronage, many other factors are involved. As such, this viability of the village centre ought not be included at Criteria 3.

Commented [AJ27]: The current separation between High Halstow and Hoo St Werburgh is significant and includes physical barriers such as the railway line and Peninsula Way. Preventing coalescence is supported but the site allocation should not predetermine that landscape buffers will be required to achieve this. Flexibility is required to allow for the optimum response to landscape character/ enhancements to be brought forward.

Commented [AJ28]: For consistency with Criteria 7 of SA8 in relation to Hoo St Werburgh and Chattenden. Should this also cross-refer to Policy T2: Housing Mix?

evidence of need. Development will provide a mix of types and designs of homes, including houses, bungalows, affordable homes and opportunities for self-build.

7. Development will provide for a new two form entry primary school in accordance with the latest IDP, located by the new local centre, with clear and attractive links to the existing village. The additional centre will complement the historic village centre, and provide space for retail, wider commercial and community facilities.
8. Development will be landscape-led and respond to the countryside setting and provide high quality green infrastructure that retains the rural character of the village, and embeds sustainable drainage and active travel in the design.
9. New open space will be provided in accordance with the Fields in Trust standards as set out in Policy DM21, and designed to integrate with the rural setting.
10. Development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport.
11. Development will support the improvement of bus services to provide effective sustainable transport links for the village, with consideration of expansion of ~~fast track bus~~ Bus Rapid Transit services linked to the urban area.
12. The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute assess impacts on the following junctions and, if required, provide proportionate contributions to the delivery of highways mitigations ~~to provide capacity to accommodate growth~~ at:
 - Four Elms roundabout
 - Main Road, Hoo, junction with A228
 - Dux Court Road/Bells Lane junction with A228
 - Ropers Lane junction with A228

Commented [AJ29]: As above to relate to a type of bus service (consistent with the terminology in the transport evidence base documents) rather than a specific operator.

Commented [AJ30]: As per comments on SA8 Criteria 15.

Subsequent design principles

The applicant will produce a masterplan, to be approved by Medway Council, to guide planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space plan.


Commented [AJ31]: This creates an additional layer of approvals that will add to the already significant burden of detail/ information on developments on the Hoo Peninsula and risks delay the delivery of much needed homes and infrastructure. As with other site allocation policies, High Halstow should have a Concept Plan that covers both of the allocated sites. Planning applications can then come forward in broad accordance (as suggested for SA8/ Figure 14 Concept Masterplan). The extant application proposals for HHH26 should form the basis for the High Halstow Concept Plan.

Site-specific information

Policies Map ID	Name	Land uses	Number of new homes and/or floorspace within plan period	Plan period (Years)
HHH15	Land adjoining 35 Cooling Road, High Halstow	Residential	Up to 5	1-5
HHH26	North of Christmas Lane, east of High Halstow	Residential Education Community and Commercial floorspace	Up to 760	1-5, 6-10, 11-15

HHH29	Parcel north of Christmas Lane, High Halstow	Residential	Up to 55	1-5
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Model Representation Form for Local Plans

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

Medway Local Plan

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<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.

[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 Lodge Hill Camp (Site: HHH1) for flexible non-residential land uses. By allocating this site, the plan can notably increase its soundness by planning positively for brownfield sites.

[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.

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>



LOCAL PLAN TEAM
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Your ref: Reg 19 Consultation
Our ref: Lodge Hill Camp, Homes
England
11 August 2025

Sent by Email: planning.policy@medway.gov.uk

Dear Sir/Madam,

Medway Council – Regulation 19 Local Plan 2041 Consultation – Representations by Homes England - Lodge Hill Camp and Military Training Area and Proposed Open Space at Lodge Hill, Chattenden

1. These representations have been prepared by WSP on behalf of Homes England in response to Medway Council's Regulation 19 Local Plan 2041 Consultation and relate to Homes England's interest in the future of Lodge Hill Camp (site ref: HHH1) and also highlight matters in relation to their wider ownership and how it is being treated in the proposed Concept Plan associated with draft Policy SA8. A separate detailed representation has also been made in relation to the allocation of new homes nearby at Chattenden Barracks (site ref: HHH3) which also considers the wider draft Concept Plan points and will be referred to in the representations below.

Introduction

2. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share its ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.
3. As set out in Homes England's Strategic Plan 2023–2028, its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice across England and the creation of places people are proud to call home.
4. A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that they support to create distinctive places and spaces that are designed for people to use and thrive.
5. The former defence land at Lodge Hill, including the Lodge Hill Camp Site, has been in military use for over 140 years. The Chattenden Barracks and Lodge Hill Estate was transferred to Homes England from the Ministry of Defence in early 2018. Within the land transferred was the former Lodge Hill Camp extending to approximately nine hectares and is the focus of the representations set out below. A section at the end of these representations covers some of the

wider Lodge Hill landholdings and how the land is referenced within the Regulation 19 Local Plan.

Purpose of Representations

6. These representations are submitted in response to the Regulation 19 Draft Medway Local Plan 2041 and relate to Homes England's land interests at Lodge Hill Camp (primarily), the former Military Training Area and associated areas to the north of Lodge Hill. They seek to reaffirm Homes England's position on the future use of these wider landholdings, and to support the soundness of the Plan by recommending modifications that would enable Lodge Hill Camp to contribute positively to Medway's spatial strategy.
7. Homes England has previously made representations during earlier stages of the Local Plan process, including the Regulation 18 consultations and the Call for Sites. Lodge Hill Camp specifically was promoted as a potential employment-led development site and was assessed in the Land Availability Assessment (October 2023) under reference HHH1. Despite this, the site remains unallocated in the Regulation 19 Draft Plan, and its potential contribution to Medway's employment land supply has not been recognised.
8. These representations respond to the current policy position and accompanying evidence base, including the updated Employment Land policies and the findings within the Evidence Base documents. Homes England is of the considered view that Lodge Hill Camp should be reconsidered for an allocation within the Plan, recognising its brownfield status, strategic location, and deliverability. The representations also address specific points raised in the Sustainability Appraisal and provide clarification on the site's constraints and opportunities.
9. Homes England remains committed to supporting Medway Council in preparing a sound and deliverable Local Plan and offers these representations to assist in refining the Plan ahead of submission for examination.

Background

10. Homes England is the freehold owner of the parts of the former Chattenden and Lodge Hill Camp military estate transferred from the Defence Infrastructure Organisation (DIO), which extends to approximately 325 hectares and includes Lodge Hill Camp, Chattenden Barracks, the former Military Training Area, and other parcels of brownfield land in and around the Chattenden Woods and Lodge Hill SSSI. Lodge Hill Camp itself comprises approximately nine hectares of previously developed land, historically used for military purposes for over 140 years. Since the cessation of military training use, more recently, parts of the estate are subject to ongoing meanwhile uses.
11. Homes England prepared a draft Vision Document for Lodge Hill Camp and Chattenden Barracks (which was submitted with the Regulation 18b representations), which outlined early opportunities and constraints and sets out an initial framework for future development. Chattenden Barracks has been considered in more detail in separate representations submitted to the Regulation 18b Plan consultation and now to the Regulation 19 consultation.
12. Lodge Hill Camp contains former military buildings, of which some are in active employment use for training purposes associated with the emergency services. There have been approaches to Homes England from commercial, distribution and service operators who have expressed strong interest in developing space at Lodge Hill Camp given the previous uses on the site. Given its

obvious status as a previously developed site, future strategies relating to this parcel continue to be progressed.

13. Homes England considers Lodge Hill Camp to be a sustainable and deliverable site with potential for a range of uses, including employment, education, and community. Its redevelopment would contribute positively to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula, supporting Medway's strategic growth objectives. Therefore, in line with Medway's obligations under Paragraph 16 of the National Planning Policy Framework (NPPF) to 'plan-positively', the site should be allocated so that it can be picked up as part of the strategic approach to growth within the Hoo Peninsula and Chattenden. This is further emphasised by recent (draft) allocations which show an increasing role of Chattenden within the area.

Regulation 19 Draft Plan Position

14. 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. 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.
15. 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. However, in the Regulation 19 Draft Local Plan, Lodge Hill Camp remains unallocated, with no specific designation for employment or mixed-use development. This continues the position set out in the Regulation 18(b) consultation, despite the site's inclusion in the latest Land Availability Assessment (June 2025) under reference HHH1, where it was identified by Medway Council as previously developed land (PDL) and available for development.

PDL MISINTERPRETATION

16. The accompanying Sustainability Appraisal (SA) continues to reject Lodge Hill Camp as a development site. Notably, the Regulation 19 SA includes a direct response to previous Homes England representations, stating that although the site contains some existing development, it would not meet the NPPF definition of previously developed land due to the presence of undeveloped areas. This assertion is both inaccurate and misleading. However, Medway Council's own Land Availability Assessment (2025) confirms the site as PDL, showing the inconsistency in the Plan's evidence base and therefore contributing to why the Plan is currently unsound.
17. Homes England strongly contests the SA's response to previous representations, particularly as the case for allocating Lodge Hill Camp is rooted in its status as a substantial area of PDL. Paragraphs 124 and 125(c) of the NPPF give substantial weight to the reuse of brownfield land for new development where substantial harm can be overcome. The Framework defines PDL (or brownfield land) in 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."

18. The definition excludes land last occupied by agricultural or forestry buildings, land developed for minerals extraction or landfill, residential gardens, and land where structures have blended into the landscape.
19. Lodge Hill Camp has a long and demonstrable history of lawful development and occupation as a core military and more recently military training establishment. It is characterised by:
 - **Permanent Structures:** The site remains extensively occupied by a multitude of permanent previous military buildings, including barracks, administrative offices, storage facilities, and other associated structures. 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, parking areas, in-use vehicular access points, parade grounds, 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 Lodge Hill Camp, 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 site is judged to fall within this category due to its comprehensive military use.
20. On this basis, Homes England (along with Medway Council) consider that Lodge Hill Camp represents a notable example of PDL, prime for redevelopment in accordance with national policy objectives.
21. This mischaracterisation within the SA has significant implications. The SA's methodology and scoring are based on the incorrect assumption that the site is not PDL, which distorts the evaluation of environmental and sustainability impacts. This undermines the objectivity and transparency of the appraisal process and the robustness of the evidence base supporting the Plan. Furthermore, the inconsistency across the evidence base demonstrates a lack of joined-up assessment, which continues to affect the credibility of the Plan's supporting documents and the subsequent way the opportunity for potential allocations have not been carried forward.

REASONS FOR REJECTION

22. In addition to the PDL issue, the SA raises the same concerns relating to the site with the reason for rejecting the site stated as:

Close proximity to SSSI. Close proximity to Ancient Woodland. Potential loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
23. In response to this, Homes England contests each of the points of rejection as set out below.

CLOSE PROXIMITY TO SSSI / ANCIENT WOODLAND

24. Lodge Hill Camp lies outside the boundary of the Chattenden Woods and Lodge Hill (CWLH) SSSI and comprises previously developed land with existing access points, buildings and hardstanding. The site has been in some degree of continuous (meanwhile) use through (and since) its former periods of occupation by varying military establishments.
25. The considerations relating to the SSSI and Ancient Woodland have come about since the surrounding areas SSSI notification in 2013. Since the site was transferred to Homes England in 2018, they have worked to best understand their statutory management requirements, undertaking a variety of management works across their ownership within the SSSI, along with undertaking regular ecological surveys (including monitoring Nightingale populations). By virtue of Lodge Hill Camp's exclusion from the SSSI notification in 2013, there is recognition that this area is less ecologically sensitive than its surroundings.
26. Reviewing the survey data Homes England has on the SSSI (set out in more detail in the Chattenden Barracks representations), there is no evidence of significant adverse impacts on the SSSI or Ancient Woodland as a result of the low intensity meanwhile uses that have taken place at Lodge Hill Camp. This demonstrates that (subject to use land-use specific mitigations), increased levels of non-residential land use on the site could coexist with the ecological sensitivities of the surrounding area. The site also benefits in having long established perimeter fences around the former Camp boundary, confirming limited interaction and impact on the SSSI currently.

Comparator (Draft) Allocations

27. Furthermore, 'allocation precedent' exists in the Regulation 19 Plan for development near the CWLH SSSI, including proposed allocations HHH6 (Land East of Chattenden) and HHH19 (Deangate Retail Park), the latter being a large greenfield employment site in very close proximity to the CWLH SSSI. Not only is this close to the SSSI, but the site forms a large greenfield parcel, where if applying the NPPF (Paragraph 124) hierarchy it would be anticipated that Lodge Hill Camp would come forward as a previously developed site if greenfield sites also in close proximity to the SSSI are being allocated in the Regulation 19 Plan. The Plan as it stands therefore has a number of inconsistencies in its approach which contribute towards it being unsound.
28. Homes England notes that in this context, the decision to not draft allocate Lodge Hill Camp due to its proximity to the CWLH SSSI is considered inappropriate and therefore the Lodge Hill Camp site should be included within the site allocations to account for the evidence and bolster the soundness of the plan. Therefore, the exclusion of Lodge Hill Camp is inconsistent and unjustified.
29. Regarding Ancient Woodland, Homes England acknowledges the statutory requirement for a 15m buffer (at the point of Ancient Woodland boundaries) and confirms that no development would encroach upon this area. The site's existing use and identified previously developed layout allow for development to proceed without significant adverse impacts on the Ancient Woodland, whilst not prejudicing the scale of the development opportunity.

POTENTIAL LOSS OF BMV AGRICULTURAL LAND

30. As already established, HHH1 is brownfield with an extensive apron constituting existing buildings and hardstanding. It is understood that the site has not been in agricultural use for at least 150 years and given the brownfield nature of the site there is no potential for future agricultural use. Furthermore, the previous intensive military use of the site would make it unsuitable for agricultural land and the reference to Best and Most Versatile (BMV) land is therefore not applicable.
31. The SA applies a blanket approach to BMV across many allocated sites and does not hold back allocations on this basis, even for those that have been farmed much more recently.

COALESCENCE BETWEEN SETTLEMENTS

32. The site is already in close proximity to Chattenden Village and is physically separated from other surrounding settlements by woodland and topography. Cliffe Woods, the nearest settlement, lies over 1km away from Lodge Hill Camp, and it has the CWLH SSSI designation on large parts of land in between and is clearly delineated by natural and built barriers that would prevent coalescence with it.
33. Furthermore, the reuse of Lodge Hill Camp would not result in coalescence, as it involves redevelopment of an existing developed site rather than encroachment into open land between settlements. A review of the Regulation 19 Policy Map illustrates that this point has no weight in the reasons for rejection.
34. The Regulation 19 Plan's main contention around coalescence in the locality relates to keeping the separation between the historic villages of Hoo and Chattenden, with a landscape buffer being a key part of that strategy. The allocation of Lodge Hill Camp to provide local employment opportunities would not undermine the remits of draft Policy SA8 in this respect.

BEYOND REASONABLE WALKING DISTANCE TO PUBLIC TRANSPORT SERVICES

35. The nearest bus stop is approximately 750m from the site on Lodge Hill Lane. While this exceeds the preferred 400m threshold, it is not a prohibitive distance, particularly for employment uses. The site would still be in close proximity to the existing community in Chattenden, the proposed housing allocations in the area, and could provide localised employment opportunities without the need to travel further afield / commute to rail stations (potentially requiring the use of a motor vehicle). It would be expected that if Lodge Hill Camp was allocated for employment-led uses that the delivery of the site would require contributions to enhanced public transport provision, as is expected of the other allocations proposed within Chattenden and those in the wider peninsula, as highlighted in the Infrastructure Delivery Plan and Strategic Transport Assessment.

SUMMARY

36. Based on the above, it is considered that the allocation of the site for non-residential uses should be forthcoming, noting the following:
 - Many of the reasons cited for the rejection of the site have been further clarified above.
 - The site is located outside of the SSSI and is a brownfield site.
 - The site has a number of buildings in situ which could be re-used, intensified and/or replaced through (sensitive) wholesale redevelopment. The scale and massing of

existing built development on site along with the presence of continued (meanwhile) uses-site should reaffirm the appropriateness of this location for development and how an allocation recognising this potential would accord with the sustainable, brownfield development objectives of the Plan.

EMPLOYMENT POLICY AND ALLOCATIONS

37. Medway Council's Regulation 19 Local Plan (Section 2.2) outlines strategic objectives aimed at fostering a robust and sustainable local economy. These include:

- Strengthening Medway's regional economic role by enhancing local business performance, encouraging innovation, and attracting inward investment and relocations. This is to be achieved through the provision of a diverse portfolio of high-quality employment land that meets business needs, supports higher-value employment opportunities, and reduces out-commuting.
- Ensuring housing and economic development needs are fully met, supported by appropriately phased grey, green, and blue infrastructure, thereby serving the evolving needs of Medway's communities.
- Delivering sustainable development that meets community needs, conserves Medway's natural and historic environment, and directs growth to suitable locations that enhance the area's economic, social, and environmental characteristics.
- Securing the long-term benefits of regeneration by prioritising the reuse of brownfield land.

38. These objectives are closely aligned with Homes England's vision for Lodge Hill Camp. The site presents a strategic opportunity to revitalise a key location within the Hoo Peninsula. Its allocation would represent an efficient reuse of brownfield land and facilitate employment-generating uses that responds to local demand. There is also an opportunity for the site to act as a receptor / relocation site for existing employment sites which have been identified for residential-led allocations within Medway, adding to the overall soundness of the Plan.

39. In support of these strategic aims, Section 7 of the Regulation 19 Local Plan sets out Medway Council's employment policies. Policy S10: Economic Strategy promotes the development of new employment facilities, including rural employment opportunities in sustainable locations. Lodge Hill Camp, situated on the edge of Chattenden and benefitting from existing infrastructure and public transport links, is well-positioned to deliver employment land consistent with this strategy.

40. A substantial gain that can be made from the allocation of the Lodge Hill Camp site is its strategic link to Chattenden and the wider Hoo Peninsula Development Framework. The site can provide opportunities to help to deliver local employment opportunities. This benefit is emphasised when reviewing the emerging site allocations which could see over 1,000 homes delivered in Chattenden (taking into account the Chattenden Barracks scheme). By having a localised employment site, there are clear economic and sustainability benefits which can be realised.

41. Furthermore, Policy S12: New Employment Sites prioritises brownfield land for employment allocations ahead of greenfield sites. Lodge Hill Camp offers a viable and early-phase brownfield medium sized opportunity that would be complementary to the larger allocations being proposed across Medway.

42. As para 7.4.3 of the Regulation 19 Plan notes:

The Local Plan will provide a range of sites to meet the employment needs identified over the plan period. This will involve the retention of existing employment sites where possible; support for enhancing and consolidating current sites to better meet the market's requirements and make better use of land; and identifying additional locations that can provide attractive accessible sites for business growth.

43. The Regulation 19 Plan sets out a minimum requirement for 204,000sqm of industrial and 36,500 sqm of office floorspace. It contends that there is a sufficient development pipeline to meet these needs but a shortage of built stock. The Regulation 19 continues with the 2003 Plan position in largely protecting and promoting growth on two main sites. Given the passage of time, the extent of development that has actually taken place and that a large proportion of industrial floorspace (157,000 sqm) is proposed in the 11 year+ period of the Plan, this brings into focus the opportunity that Lodge Hill Camp could provide in the early part of the Plan to deliver a sustainable employment-led allocation to complement the future growth of new homes in Chattenden.

44. The inclusion of Lodge Hill Camp supports these underlying principles and its inclusion in the Local Plan would contribute meaningfully to Medway's economic objectives and provide a realistic pathway to employment land delivery within the plan period.

POLICY MAP

45. Homes England notes that the latest version of the Policies Map identifies part of the Lodge Hill Camp area as a 'Minerals Consultation Area', with adjacent land to the north designated as a 'Minerals Safeguarding Area' under Policy T30. It is understood that this designation may be an anomaly and should not preclude development on the Lodge Hill Camp site. Homes England again requests clarification on this point as no adequate response has been received in relation to previous requests that this is an erroneous designation on the Proposals Map. Homes England again request that this designation be reviewed to ensure it does not unnecessarily constrain the site's future use.

46. Furthermore, Homes England contends that a mineral safeguarding designation in this location is inappropriate given the surrounding context (SSSI's notified features, Scheduled Monument etc), meaning any mineral extraction would be unsuitable at Lodge Hill.

Deliverability in line with the NPPF

47. Homes England considers Lodge Hill Camp to be a deliverable site in accordance with the National Planning Policy Framework (NPPF). The site is available now, suitable for development, and achievable within the plan period. It is under single ownership, and Homes England is actively progressing proposals for its future use, including employment, education, and community uses.

48. The site's brownfield status, confirmed by Medway Council's Land Availability Assessment, significantly contributes to its suitability for redevelopment. The presence of existing buildings and hardstanding offers opportunities (and precedent) for the sensitive redevelopment (and intensification) of the entire parcel, including for reuse and/or wholesale new development. The

site's scale and configuration also allow for flexibility in land use, which is particularly important given the evolving nature of employment and community needs.

49. Homes England has undertaken initial technical and environmental assessments, which confirm that there are no overriding constraints to development, including existing vehicular access. The site lies outside the CWLH SSSI and can be brought forward in a manner that respects its immediate landscape context. Furthermore, the potential for public transport improvements and active travel connections enhances the site's accessibility and integration with the wider Chattenden area, which is planned for residential growth with the opportunity for more brownfield-led development as noted in Homes England's representations on Chattenden Barracks. The allocation of Lodge Hill Camp for employment uses will enhance the sustainability of the area by providing opportunities for local employment alongside the proposed new homes. It would provide a medium sized opportunity that would assist in the Plan's objectives to reuse other current employment sites for residential growth and therefore provide a relocation and employment growth opportunity.
50. The NPPF encourages local planning authorities to make effective use of land, particularly previously developed land, and to support economic growth in rural areas. Lodge Hill Camp aligns with these objectives and offers a realistic opportunity to contribute to Medway's employment land supply and broader spatial strategy. Its inclusion in the Plan would support the tests of soundness in Paragraph 36 of the NPPF by ensuring the Plan is positively prepared, justified, effective, and consistent with national policy.

Policy SA8 – Concept Plan

51. Homes England also has concerns regarding how land within its ownership at Lodge Hill has been 'allocated'. While it is noted that these areas are not formally set out on the Policies Map, nevertheless they are included within a concept plan in the main body of the text of the Plan which seeks to provide concepts guiding different land uses for the Hoo Peninsula.

ENVIRONMENTAL CONSERVATION LAND

52. The listing of 'Lodge Hill Training Area (Closed)' as Environmental Conservation Land in the Regulation 19 Local Plan (Policy SA8 - Concept Plan) should be reconsidered as it represents unnecessary duplication of the statutory designation provided by the SSSI status. This area contains a number of former military buildings and areas of previously developed land, some of which are in long term use in association with existing tenancy arrangements.
53. Therefore, there clearly is the potential for low-impact, sensitively considered land uses that would not compromise the ecological value of the area. On this basis, it is not a closed area, but one that has secure access due to its former use and being on private land. Homes England requests that the annotation be removed (with no reference to closed) to allow for appropriate future consideration of land uses that could be suitably assessed in consideration of the statutory designation already in place.
54. Since taking ownership of the land at Lodge Hill, Homes England has undertaken management of parts of the SSSI, comprising scrub management, grass cutting and woodland management. The SSSI designation itself is sufficient to ensure this area is properly managed and planned for in the future and it does not require further local policy layering which could cause ambiguity and confusion in the proper planning of the area.

PROPOSED OPEN SPACE

55. In addition, Homes England also strongly contends the annotation of land to the north of the Former Military Training Area at Lodge Hill shown as an area of 'Proposed Open Space' on the Hoo St Werburgh Concept Plan (Regulation 19 Local Plan – Figure 14) - this being annotated without any explanation and/or policy justification. As noted in more detail in the representations on Chattenden Barracks, Homes England intends to comment further once the Habitat Regulations Assessment is updated and discussions with Medway Council and Natural England progress. It is clear, at this stage, that this area of the Plan is not sufficiently advanced to warrant this inclusion or make additional comment on.

Conclusion

56. Homes England welcomes the continued progress of Medway Council's Local Plan and supports its overarching vision, strategic objectives, and commitment to a brownfield-first approach. Lodge Hill Camp represents a unique opportunity to deliver high-quality, employment-led development on previously developed land in a sustainable location, consistent with NPPF Paragraph 85, which places significant weight on supporting economic growth and productivity, and Paragraph 124, which promotes the effective use of land, prioritising brownfield sites.
57. By failing to allocate or plan for development at the site, the Council is not meeting its requirement to plan positively as set out in Paragraph 16 of the NPPF, nor is it providing a strategy that meets employment needs as required by Paragraph 20. Homes England considers that good and proper planning is required for strategic sites like Lodge Hill Camp, which have the potential to positively influence the area's economic and social outcomes. Its omission from the Regulation 19 Draft Plan is a missed opportunity and raises concerns regarding the robustness of the evidence base and the soundness of the Plan, as defined in Paragraph 36.
58. The site is available, suitable, and achievable, and its inclusion would support the delivery of employment land in line with national policy and local growth objectives. Homes England strongly contests the conclusions of the Sustainability Appraisal, particularly the mischaracterisation of the site's previously developed land (PDL) status and the failure to reflect Medway Council's own evidence base. These issues undermine the justification for excluding the site and should be addressed to ensure the Plan is positively prepared, justified, effective, and consistent with national policy, in accordance with Paragraph 36.
59. Leaving the site unallocated risks perpetuating uncertainty and underutilisation, while limiting the ability to provide a coordinated approach to the wider Lodge Hill area. 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.
60. Homes England remains committed to working collaboratively with Medway Council and stakeholders to bring forward Lodge Hill Camp in a way that supports the wider regeneration of the Hoo Peninsula and contributes meaningfully to Medway's future growth.

Yours faithfully,



Andrew Pepler - Director (Planning Consultancy)

Planning Service
Medway Council
Gun Wharf
Chatham
Kent
ME4 4TR
Via Email: planning.policy@medway.gov.uk

11th August 2025

Dear Sir / Madam,

Land North of Brompton Farm Road, Strood

Introduction

Further to our previous representations made in relation to the above site dated September 2024, the Council has now published the Medway Local Plan 2041 Proposed Submission Draft, Regulation 19 for consultation.

These representations have been prepared on behalf Brookworth Homes Ltd who own and control the above land. We are supportive of the draft Plan and welcome the allocation of the above land within it under the auspices of policy SA6: Land West of Strood. The land is shown below denoted by the SR5.

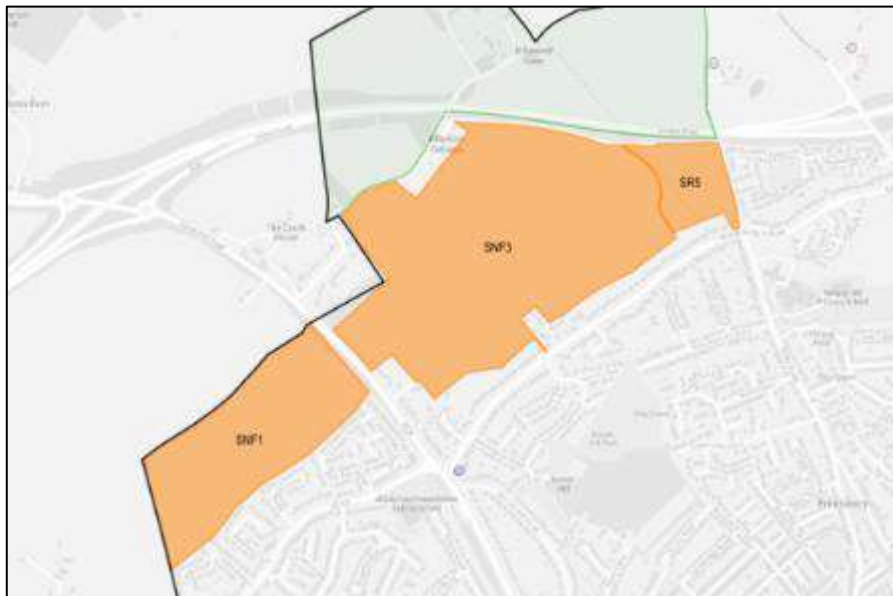


Figure 1: Land North of Brompton Farm Road, Strood denoted by SR5

The Plan falls to be considered under the tests of soundness set out at paragraph 36 of the National Planning Policy Framework (NPPF) (2025). This confirms:

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) 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;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) 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

d) 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."

The remainder of this representation provides commentary on improvements to the plan which we believe are necessary to ensure it passes the above tests. It also considers the duty to co-operate.

Policy SA6: Land West of Strood

Policy SA6 seeks to deliver up to 1,280 new Medway homes within the plan period across three parcels of land, SNF1, SNF3 and SR5 which the land controlled by our client. In relation to SR5, up to 120 new homes are allocated as set out in the table under the heading Site Specific Information.

The drafting of this policy should be amended to ensure soundness. Paragraph 61 of the NPPF confirms the Government's objective of *"significantly boosting the supply of homes"*. The NPPF was amended off the back of a Written Ministerial Statement dated 30th July 2024. This contains the frank admission that:

"We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home."

It concludes with a call to arms:

"There is no time to waste. It is time to get on with building 1.5 million homes."

The current wording of policy SA6 artificially constrains delivery of housing, prevents efficient use of land and stymies the Government's growth ambitions. It is not consistent with national policy or positively prepared as identified above. The Council should alter 'up to' to 'around' or preferably 'a minimum of' to enable a given developer to demonstrate a higher number of dwellings can be delivered in an acceptable fashion without an arbitrary policy barrier preventing them as a matter of principle.

We welcome the confirmation that the site will be expected to provide for residential land uses only, unlike SNF1 and SNF3 which will provide for residential with opportunity for other TBD and other TBD respectively. This is a pragmatic drafting which reflects the comparative size of the sites allocated and the inability of SR5 to provide a local centre, commercial development, school provision, play pitches, football pitches and indoor sports facilities in addition to much needed housing. We also welcome the anticipated delivery within the first five years of the Plan as this reflects the housebuilder's desire to bring development on the site forward without delay.

We are concerned regarding criterions 12 and 16 which requires a landscape led masterplan to be produced in collaboration and agreed with both Medway Council and Gravesham Borough Council. It is unclear what the mechanism for approval of this plan is. Planning policies should give the decision taker a clear indication how they should react and applicants a clear steer as to what is required. Whilst the aspiration for the proponents of SNF1, SNF4 and SR5 to work together on a masterplan is clear, there is a significant degree of ambiguity as to how this plan becomes approved and what status, if any, it holds once it has. It's also unclear why approval needs to be gained from Gravesham Borough Council for a development that is to take place entirely within the confines of Medway District in the case of SR5. The Council should consider the wording of this policy or work with the proponents of SNF1, SNF4 and SR5 to produce a parameters plan / master plan prior to adoption so this can be included in the development plan or alternatively, this requirement should be deleted. For the avoidance of doubt, Brookworth Homes

can bring SR5 forward as a standalone site, without the need for input from adjoining landowners and without the need for such significant on-site infrastructure to service the development.

Criterion 18 refers to a necessity for a Section 106 Agreement to secure provision of financial contributions towards the provision of infrastructure, including additional primary and secondary school places in accordance with the latest IDP. Given policy SA6's requirement to adhere to the 'golden rules' in relation to affordable housing, it is imperative that the contributions are of a level that renders the development viable. Scrutiny must be applied to the tests set out at Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 that contributions sought need to be:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

This speaks to having an effective plan that is deliverable over the plan period when related back to the tests of soundness. This is of particular concern given the comments in the Council's Local Plan Viability Assessment Update – June 2025:

"Whilst not a specific matter for this study and the soundness of a Local Plan, only the larger (over 200 units) sites are likely to be able to bear 45% (30% + 15%) or more affordable housing." (Paragraph 10.24)

Contrary to the above, regrettably this does go to the issue of soundness as the plan should be deliverable. SR5 is currently allocated for up to 120 new homes. This is less than the threshold of 200 units referred to above in the Council's own viability report. SR5 is therefore unlikely to be able to bear the cost of 45 % affordable housing and significant section 106 contributions which the Council's Viability Appraisal puts at £22,531 per dwelling (notably including on affordable dwellings). The expectation of such significant Section 106 contributions should be reduced or the affordable housing percentage dropped in line with paragraph 67 b) of the NPPF. There would be no difficulty in setting an affordable housing requirement for SR5 that differs from SNF1 and SNF4 on account of its size as per paragraph 68 of the NPPF.

The contributions currently anticipated by the Council appear to be based upon inflated sale prices of £4,600 per sqm which we do not believe will be achievable. A sales value of £3,500 for SF5 is considered more realistic.

Duty to Co-operate

The duty to co-operate is a critical hurdle to overcome in the local plan in the examination process. Both Mid Sussex District Council and Horsham District Council have recently failed examination having failed to meet the duty to co-operate in 2025. Horsham District Council failed due to insufficient engagement with neighbouring authorities, especially Crawley and Mid Sussex, a failure to address unmet housing need and inadequate strategic cooperation on water neutrality solutions. Mid Sussex failed as a result of a failure to account for unmet housing need of neighbouring authorities and, despite Statements of Common Ground, the Inspector concluded strategic cooperation was lacking.

The Medway Local Plan refers to cooperation with Gravesham Borough Council at several points, most pertinent to these representations in relation to Policy S7 where it confirms:

"The Council has reviewed the Green Belt boundary under the Duty to Cooperate with Gravesham Borough Council establishing exceptional circumstances for Green Belt release and accommodating the release of land west of Strood (Policy SA6) to accommodate sustainable growth."

And in Policy SA6 which asserts:

"Medway Council will work collaboratively with Gravesham Borough Council to deliver this strategic cross border Green Belt site providing up to 4,000 new homes, two primary schools, an expansion of an existing primary school, a secondary school, 2 hectares of employment and a local centre , 2 football pitches and indoor sports provision."

The Council's Duty to Co-operate Statement (June 2025) identifies an intention at paragraph 1.4.2 to enter into a Statement of Common Ground with, *inter alia*, Gravesham Borough Council. Gravesham Borough Council are a proposed signatory to the Council's Initial Proposed Composite Statement of Common Ground with Strategic Bodies (June 2025).

We would suggest that a separate Statement of Common Ground be prepared with Gravesham given the strategic site proposed under policy SA6 and the importance in terms of housing delivery to both local

plans respectively albeit we are comforted by the acknowledgement that *"It is important to note that the three sites in Medway, to the west of Stood, could come forward as independent developments, regardless of Gravesham Borough Council's emerging local plan, for 1,280 homes."* (Paragraph 2.2.3)

A separate Statement of Common Ground is also considered necessary given Gravesham's request that Medway accommodate 2,000 homes which it alleges it cannot deliver within its own boundaries. The Statement of Common Ground should focus on outcomes that have been achieved to demonstrate effective co-operation rather than simply record dialogue. A greater emphasis should be placed on the duty to co-operate within the Council's submission to the examining Inspector.

Conclusion

These representations have been prepared on behalf of Brookworth Homes Limited in relation to land North of Brompton Farm Road, Strood. We welcome the allocation of the land although suggest the efficient development of the site should not be constrained by the use of 'up to' in Policy SA6. We have some concerns over the viability of the site when the golden rules and significant S.106 costs are applied in combination although we have proposed measures by which this can be mitigated. We would suggest further work is undertaken by the Council in relation to the duty to co-operate, particularly given the outcome of other recent local plan examinations in this respect. Overall, the plan requires some minor amendments to be considered sound in the context of paragraph 36 of the NPPF.

If you have any queries or would like any additional information, please do contact me.

Yours sincerely



Mark Best BSc (Hons) MSc MRTPI
Director
For and on behalf of Parker Dann



Land South of Lower Rainham Road, Gillingham

Medway Local Plan Regulation 19 Consultation

Date of report: August 2025

PREPARED FOR

Catesby Estates plc

savills

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Document History

Issue	Date	Issued by	Comment
1.0	01/08/2025	PR	Complete Draft for Internal Review
2.0	06/08/2025	GD	Issued for Client Approval
3.0	11/08/2025	PR	Updated with Client Comments and Finalised

1. Introduction

- 1.1 Savills has been instructed by Catesby Strategic Land (Catesby) to prepare representations to the Draft Medway Council Regulation 19 Consultation (R19). The Consultation on the R19 Local Plan commenced on the 30 June 2025 and closes on the 11 August 2025.
- 1.2 These representations focus on the Land South of Lower Rainham Road (herein referred to as 'the Site'), which lies to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. The Site has been promoted through all stages of the emerging Medway Local Plan.
- 1.3 The Site was re-submitted to Medway Council as part of the Call for Sites exercise between November 2022 and February 2023. The Site was subsequently identified under reference RN5 by the Medway Council (MC) as set out in the Land Availability Assessment (LAA). Catesby submitted representations to the Regulation 18a consultation in October 2023 and the Regulation 18b in September 2024. These should be read alongside these latest representations.
- 1.4 These representations are to respond to the R19 Local Plan and supporting evidence base.
- 1.5 The following documents are submitted with these representations:
- Vision Framework Rev. H (February 2023) – Appendix A
 - Rainham Road, Gillingham, Medway District, Kent – A Proposal for a Sustainable New Neighbourhood – Appendix B
 - Housing Land Supply Technical Paper – Appendix C
 - Duty to Cooperate Technical Paper – Appendix D
- 1.6 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. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process. The observations made within these representations are to support Medway Council in preparing a sound plan.

2. The Site

- 2.1 The Site comprises four irregular-shaped, linked parcels of land to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. Together the parcels comprise 30.21 hectares of greenfield land that have been used for different purposes including arable / grazing land and include areas of horse paddocks and stables and a former chalk pit which is now remediated. The Site Location Plan can be seen in Figure 2.1 and has been identified by site ID RN5 in the Land Availability Assessment (September 2023).

Figure 2.1: Site Boundary



- 2.2 The Site is located to the south of the Lower Rainham Road where it adjoins Lower Twydall Lane. The western boundary of the Site is a field boundary just west of Eastcourt Lane. The east of the Site is bordered by open fields separated by hedgerows, and to the south east of the Site by an open field, also separated by hedgerows. There is an existing development along Lower Rainham Road and abutting the Site on Lower Twydall Lane.
- 2.3 A historic and remediated chalk pit is located within the eastern cluster of fields, the extents of which are defined by the mature tree and hedgerow lines.
- 2.4 It is noted that the Site has a gradual incline in ground level rising south from Lower Rainham Road. The remediation of the chalk pit has created a man made localised high point at around 25m.
- 2.5 The Site is located within an Area of Local Landscape Importance as indicated on Map 4 of the adopted Local Plan policy maps. This Local Landscape spans across a wide area beyond the Site including Lower Tydwall and Lower Rainham. A designation, denoting the Boundary of Tidal Flood Area, is contained to the north of Lower Rainham Road and as such the whole of the site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding). The Riverside Country Park is located immediately to the north of Lower Rainham Road.
- 2.6 The south of the Site is immediately adjacent (but not within) the Lower Twydall Conservation Area. There are no listed buildings within the boundary of the Site however, there are a number of listed

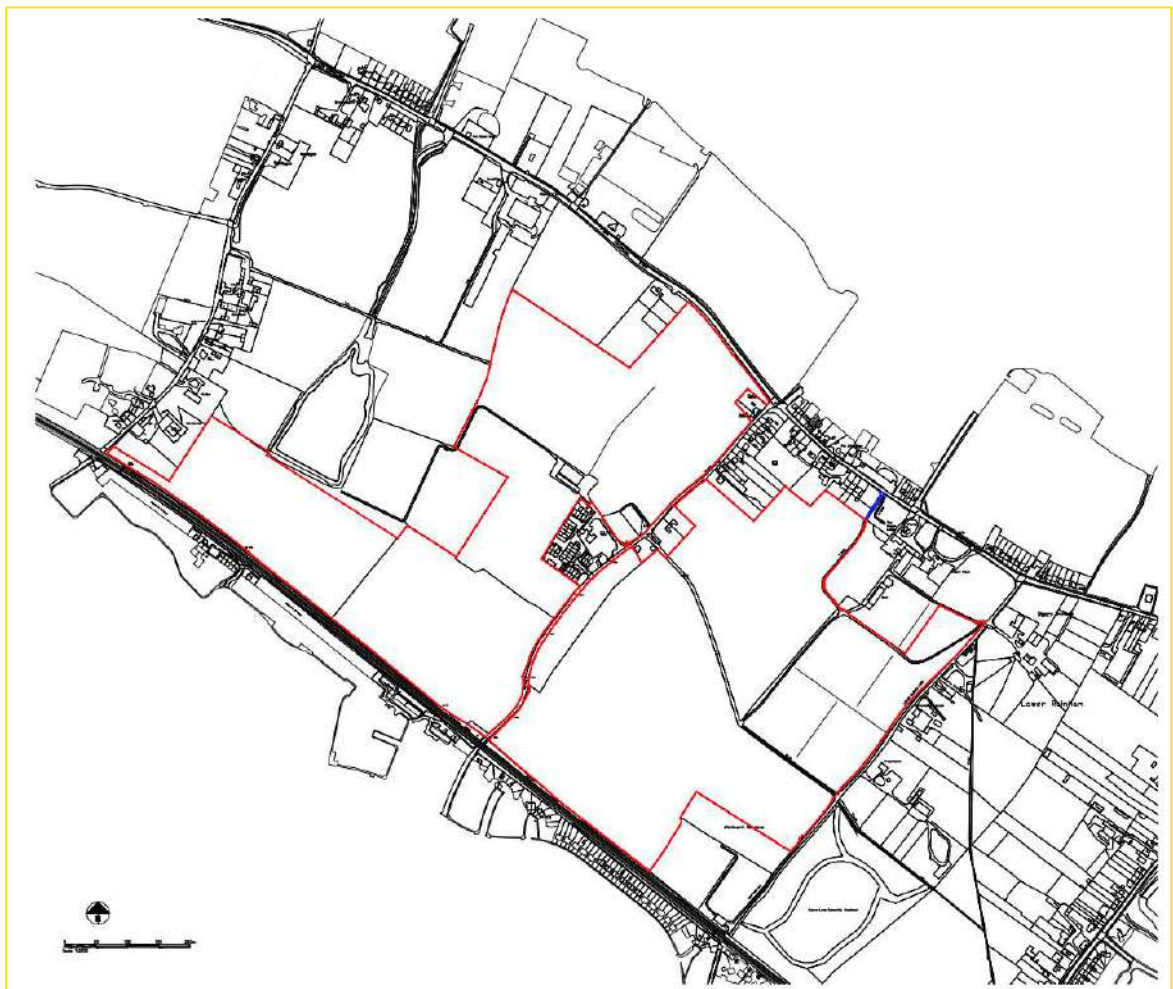
buildings that are located in close proximity to the Site. The majority of these comprise buildings within the Lower Twydall Conservation Area. These buildings are not positioned in such a way that would constrain the future development potential of the Site.

- 2.7 No other policy designations impact upon this Site, and it is therefore relatively unconstrained.

Neighbouring relevant planning application

- 2.8 An application (reference: MC/19/1566) for approximately 1,250 dwellings and supporting community infrastructure was submitted on the land to the south east of the promotion Site (application site known as “Land Off Pump Lane Rainham”). The location of this proposal can be seen in Figure 2.2. The application was refused in June 2020 and the subsequent appeal was dismissed by the Secretary of State in November 2021 on the basis of landscape and visual impact and cumulative highways impacts. This site has now been allocated for development within the R19 Local Plan.

Figure 2.2 – Site location plan of adjoining Land off Pump Lane, Rainham (reference: MC/19/1566)



3. The Development Opportunity

- 3.1 The Site provides an opportunity to provide a new residential-led development with supporting community infrastructure. It has the ability to come forward in isolation or as part of a wider allocation within the surrounding suburban expansion area. A Vision Framework was provided with representations made to the R18a and R18b consultation and has been reattached to these representations (**Appendix A**). The Vision Framework outlines:
- How the development would be provided in new distinct clusters/hamlets of organic growth that are sensitively located along the established movement routes and between existing development clusters.
 - The inclusion of community facilities such as a new primary school, community building and retail store.
 - The enhancements to the landscape that will supplement and enhance the landscape character. This includes a wooded extension, a new country park, community allotments, community orchards and outdoor education. These elements would be woven throughout the development proposal.
 - The enhancements to sustainable and active transport modes that will be created as part of the proposed development including a circular bus route and cycle routes.
 - Provide appropriate separation to the Lower Twydall Conservation Area, while also providing new homes in a highly sustainable location.
- 3.2 The key principles of the Vision Framework are still supported. However, Catesby acknowledges that MC has allocated the land to the east of the Site for the development of 750 with supporting infrastructure. This allocation is set out at draft policy SA10 with the development known as Rainham Parkside Village. Catesby supports development in the Lower Rainham area and considers that the Land to the South of Lower Rainham Road can support the holistic growth of the area whilst maintaining the landscape character.
- 3.3 There is concern that the allocation of 750 homes with the level of infrastructure requirements could result in an eroded landscape character. Figure 3.1 below demonstrates the tightly packed parcels of development that are proposed as part of the masterplan for Rainham Parkside Village. The masterplan appears to be driven by the available land rather than establishing a strong landscape framework. It does not represent a fragmented or dispersed settlement pattern akin to the landscape character and has limited opportunities for the integration of meaningful green infrastructure. The secondary school is proposed on the most visually prominent land.
- 3.4 This is easily resolved through the careful masterplanning of a more holistic scheme, spanning across the entire Lower Rainham Area including the Land south of Lower Rainham Road as illustrated in Figure 3.2. This is the approach already advocated by MC in relation to Policy SA10 which highlights the benefits of a larger scale, plan-led scheme.
- 3.5 Key principles of the proposed landscape-led development across Lower Rainham are:
- Clusters of development are proposed to be distributed through the area with the development pattern broadly within a north – south orientation reflecting the existing land and fields. This development would be broken with east-west breaks.
 - Each cluster of development would have an individual design and layout to reflect the character of local villages.
 - Landscaping and green infrastructure will form an integral part of the development. Boundary vegetation will be retained and enhanced. New planting will be incorporated within the development clusters to integrate the new development into the landscape and reinforce the existing green backdrop.

- The proposals include buffers to the Conservation Areas comprising green spaces and retained / new orchards.
- Creation of a well-connected and safe network of open spaces with appropriate signage included to highlight important landscape and heritage features and encouraging active modes of transport.
- Ensuring proactive maintenance and management of public open spaces and landscape features.

3.6 For further details refer to the LDA Design “Rainham Road, Gillingham, Medway District, Kent – A Proposal for a Sustainable New Neighbourhood” included at **Appendix B**.

Figure 3.1: Existing context and Lower Rainham concept plan

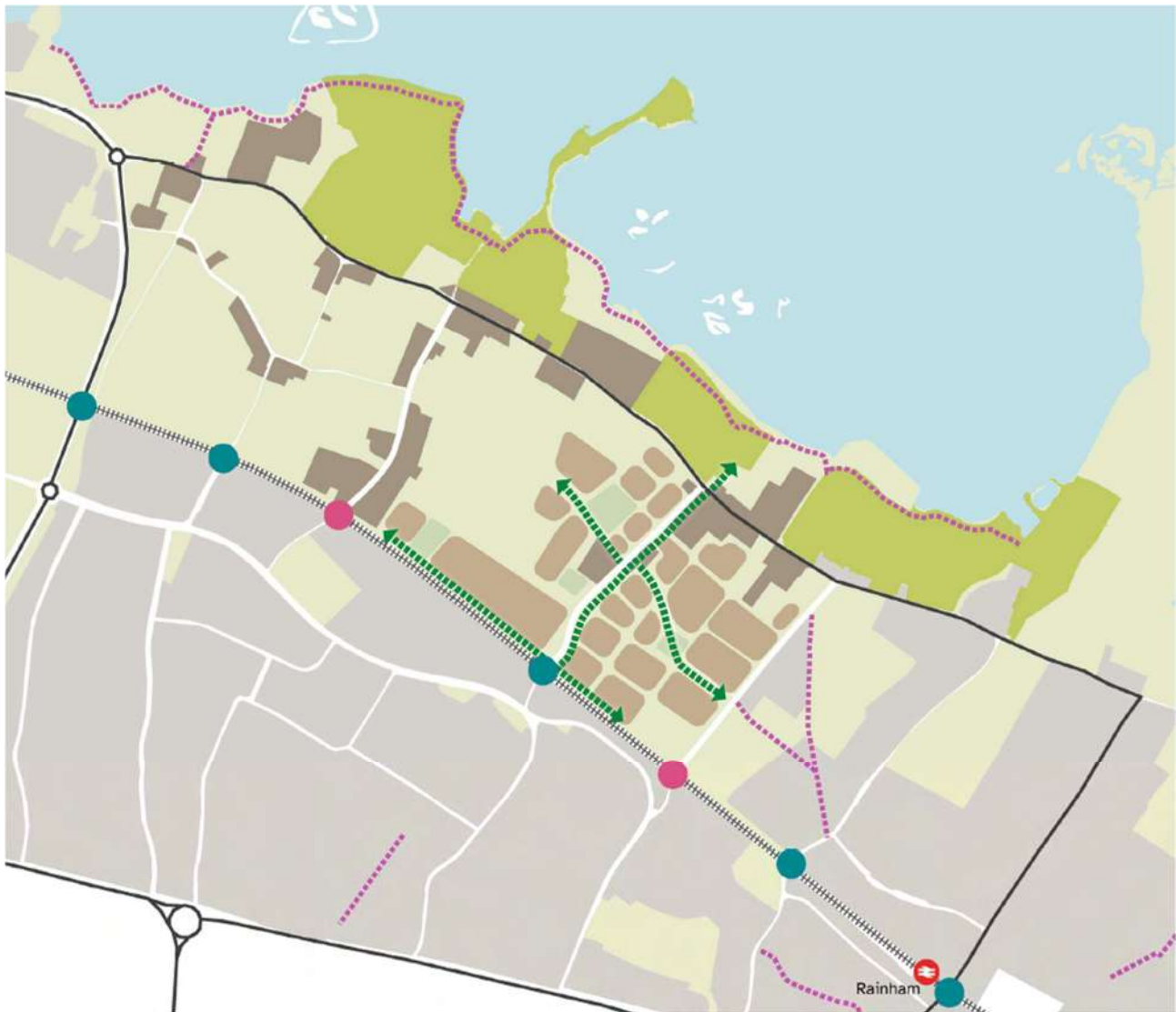
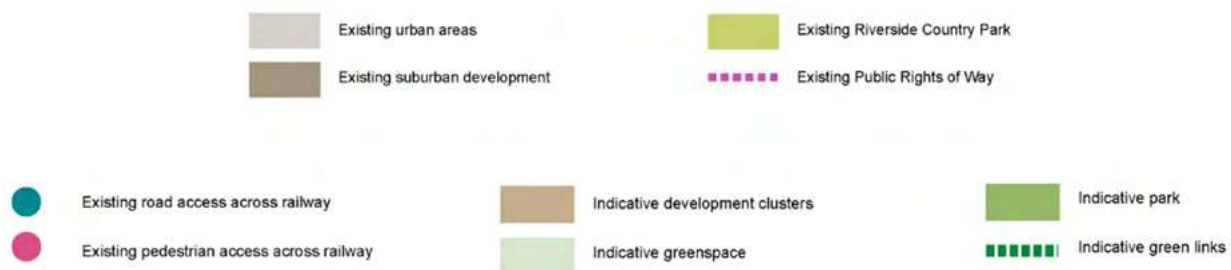


Figure 3.2: Indicative landscape-led development concept



Key for Figures 3.1 and 3.2



Planning History

- 3.7 This Site has been promoted within the call for sites exercise which was conducted by MC between November 2022 and February 2023. The Site was also promoted through the previous iteration of this emerging Local Plan. Representations were submitted to the MC Development Options Consultation on the Emerging Medway Local Plan “Future Medway” which closed on 18th April 2017.

4. Evidence Base

4.1 MC has published some evidence base documents that support the R19 Local Plan consultation. Of the documents that are published, the following are examined in this section:

- Sustainability Appraisal Volumes 1-3 – June 2025
- Land Availability Assessment – June 2025
- Strategic Transport Assessment – June 2025
- Infrastructure Delivery Plan – June 2025
- Viability Assessment – 2025 Update

4.2 Evidence relating to MCs Duty to Cooperate and the housing strategy is provided separately at **Appendix D**.

4.3 Catesby and Savills reserve the right to comment on any of the further evidence base documents as applicable to the Site and as the LP progresses through to examination.

Sustainability Appraisal

4.4 The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be undertaken through the plan making process with the 'objective of contributing to the achievement of sustainable development'. The SA should assess the likely effects of the Local Plan when considered against alternatives.

4.5 Lepus Consulting (Lepus) has prepared the SA to support the MC R19 consultation. It comprises three volumes. This SA reflects the R19 Local Plan. An interim SA was provided with the R18b consultation and observations on the Growth Options, Spatial Delivery Options and Spatial Growth Options were provided at this time. These representations do not seek to duplicate previous comments.

Spatial Delivery Options

4.6 Table 5.3 of the SA sets out the Spatial Delivery Options (SDO) identified by MC. The Land South of Lower Rainham Road, falls into the 'North of Rainham' area. In respect of this area, paragraph 5.4.3 of the SA explains that the likely range of homes that could theoretically be delivered between 2,560 and 3,275 new homes. When these scenarios were tested against the sustainability objectives, (SA Table 5.4) the SDO to the north of Rainham performed well against many of the other SDOs. Despite this, the R19 Local Plan only allocates approximately 863 new homes in this area which is significantly below these thresholds. Whilst it is appreciated that a combination of the SDOs will be required, it seems clear that MC should be allocating greater growth within the North of Rainham Area.

Spatial Growth Options

4.7 In respect of the Spatial Growth Options (SGO), a blended approach (Option 3) was considered the most appropriate option. This initially did not include land North of Rainham. However, following the R18b consultation and compelling representations to allocate more land at Lower Rainham (RN9), the Council has allocated land as set out in MC's comment on Page 33 of the SA Volume 2. Catesby support the addition of land within the North of Rainham Area. There is, however, concern that reliance on 'compelling representations' in isolation is not a justified approach and further information should be provided in respect of this change in strategy. As part of this review, Catesby recommend that the SGO are reviewed against the residential threshold of the SDOs. This would result in a greater spread of housing across the district.

The Site (RN5)

- 4.8 An assessment of strategic reasonable alternative sites is provided in the SA Volume 3. Appendix J confirms that Site RN5 has been rejected for the following reasons:

“Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Conservation Area. Beyond reasonable walking distance to current public transport services.”

- 4.9 This conclusion fails to recognise the significant benefits that can be provided by the Site, either in isolation or as part of a wider strategic development adjacent to Rainham Parkside Village (RN9). Nor does this conclusion consider the post mitigation potential at the Site to provide a sensitively designed development that ensures the protection of existing settlement structure, protects and enhances the conservation area and integrates significant active and public transport measures. Thus, it is considered that the assessment of the Site is very limited in its strategic outlook.
- 4.10 Furthermore, MC is taking an inconsistent approach in respect of coalescence between settlements and BMV. For instance, the inclusion of an allocation in Capstone Valley will clearly result in the merging of Hempstead, Capstone and Lordswood. Catesby consider that MC need to be open-minded to the approach to ensure existing settlement structures are retained whilst allocating sites. Thus, the potential coalescence of settlements should not be a reason to discount the land south of Lower Rainham Road. As set out in **Appendix A**, the vision for the Site is centred around a landscape led approach, including development patterns that broadly follow the orientation of the existing lanes and field patterns and amble green space, including a new park, to limit the sense of coalescence. In respect of BMV, the land at Strood West is also considered to be Grade 1 land but this has not resulted in the site being discounted from the process.
- 4.11 In addition, the conclusion does not appear to reflect the assessment of RN5 post mitigation in Appendix I of the SA Volume 3. Table 4.1 below provides a comparison of the Lepus R19 Assessment and the Catesby Assessment of RN5.
- 4.12 In Appendix J, sites with a similar SA assessment to RN5, such as HHH8, have been selected and with the following reasoning:
- “The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.”*
- 4.13 This clearly demonstrates an inconsistent approach to the selection and rejection of reasonable alternative sites for allocation. Thus, the SA and the Plan cannot be considered to be positively prepared or justified.

Table 4.1 SA assessment of RN5

Site Reference	Climate change mitigation	Climate Change Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
Lepus assessment of RN5 R19	+/-	+	+/-	-	-	--	++	-	0	-	0	+
Catesby Assessment of RN5	+/-	+	+/-	-	0	-	++	+	0	+	0	+/-

- 4.14 It is understood from Table I.3.15 of the SA, that the major Negative effect attached to natural resources is based upon the Agricultural Land Classification. It is acknowledged that Natural England mapping identifies the land as Grade 1 land. However, Natural England acknowledge that *“these maps are not sufficiently accurate for use in assessment of individual fields”*. Catesby has undertaken an initial assessment that has identified that a large proportion of the Site is likely to be Grade 3B based upon the previous uses. It is accepted that some of the land could be Grade 1 and 2 – as is significant swathes of land to the north and east of Gillingham and other areas of Medway. Thus, it is considered that the impact would be a minor negative, similar to the conclusion reached for the adjoining site RN9 (Rainham Parkside Village).
- 4.15 In respect of the Pollution and Waste objective, it is considered that the minor negative effects arise from air quality. The Site is situated in proximity to two AQMAs which might see a modest increase in traffic movements created from the Site. In respect of the Gillingham Pier Road AQMA, the last Air Quality Annual Status Report 2022 confirmed that *“The AQMA declared at Gillingham has consistently recorded concentrations below the Air Quality Objectives (AQO)”* and the draft Air Quality Action Plan states *“As a result of the sustained improvements in air quality in Gillingham AQMA, and consistent annual mean NO₂ measurements below 90% of the AQO”*. The other AQMA that could see minor effect from the development is at Rainham Highstreet. The draft Air Quality Action Plan states that the *“There have been consistent annual mean NO₂ measurements below 90% of the AQO in Rainham AQMA, although concentrations have risen slightly from 2020 to 2022.”*
- 4.16 Given the proximity of the Site to these AQMAs, the introduction and promotion of more sustainable modes of travel as well as the provision of on site facilities, will result in a negligible effect on these AQMAs which are currently operating at a lower pollution rate.
- 4.17 The assessment against Transport and Accessibility is incorrect and it has to be questioned whether the SA has considered the evidence base and previous representations from Catesby. It is accepted that the Site is not within easy walking distance of a railway station. However, the proposed development will include new local services and increase the accessibility to public transport modes, thus these improvements should be assessed as a minor positive. Especially so given the allocation of Rainham Parkside Village and the improvements which this site will undoubtedly deliver.
- 4.18 Table G.3.1 of the SA concludes that the development of the Site would result in major negative effect before mitigation. The Government Flood maps for Planning demonstrate a very low portion of surface water flooding at the Site and therefore it is not clear why the development of the Site would result in major negative effects.

Sites RN8 and RN9

- 4.19 Appendix J outlines the reason for the selection and rejection of sites. In respect of site RN8, the SA states:
- Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Potential adverse impact on Conservation Area*
- 4.20 And Site RN9:
- Following Regulation 18b consultation, site promoter has demonstrated how concerns and constraints could be addressed*
- 4.21 It is essential to note that site RN8 forms part of RN9 and is adjacent to the Land South of Lower Rainham Road (RN5). Sites RN5 and RN8 have been rejected for the same reasons. Site RN9 is subject to exactly the same planning constraints. Thus, if a developer can demonstrate that these concerns can be overcome, then there is no reason the concerns at the adjacent sites can't be overcome. Catesby also reiterate that they have provided strong evidence to demonstrate that issues relating to BMV, coalescence and impact to heritage assets within these representations and

in previous representations. Consequently, MC has again taken an inconsistent approach to their evidence base and it cannot support a justified Plan.

Summary

- 4.22 Given the above it is clear that the SA has not fairly assessed the reasonable alternatives in respect of spatial growth options and Site allocations. It is therefore very questionable whether the SA can support an appropriate strategy that has not been informed by properly assessing reasonable alternatives. Consequently, the Plan is not sound in its current form.

Land Availability Assessment

- 4.23 The PPG explains that the purpose of a Land Availability Assessment (LAA) as “An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.” (Paragraph: 001 Reference ID: 3-001-20190722).
- 4.24 A LAA should allow Local Planning Authorities to clearly understand the land available in their area to bring forward housing, as set out in NPPF paragraph 72. It should be used as a tool to identify a sufficient supply of sites either deliverable within the first 5 years of the Plan Period or developable sites / locations for years 6-10 or 11-15 of the Plan Period. As part of this, the LPA should assess a sites availability, suitability and likely economic viability.
- 4.25 The LAA is a key document in justifying the spatial strategy and ensuring that the plan is effective.
- 4.26 The MC LAA 2025 sets out the methodology used to assess the sites that were submitted to them as part of the Call for Sites exercise in January 2023. The Stage 1 assessment screened the sites that were capable of delivering more than 5 homes (or over 0.25 Hectares from employment sites). The initial assessment also considered the sites against footnote 7 of the NPPF in respect of whether there was a strong reason for refusal for restricting the scale or type of development. Importantly the Land South of Lower Rainham Road was progressed to the Stage 2 assessment which is included at Appendix E of the LAA.
- 4.27 The PPG (at Paragraph: 026 Reference ID: 3-026-20190722) makes it clear that an output of the LAA should include evidence justifying why sites have been discounted. This has not been completed with the LAA. Instead, the conclusions are set out within the SA. The SA and LAA are two separate assessments that have different overarching objectives. The LAA provides MC with an understanding of the land they have available to them to develop whereas the SA assesses MCs preferred approach against the key sustainable objectives to ensure the overarching sustainable objectives set out in the NPPF are met. As such, they should be completed independently and it is imperative that the conclusions of the LAA are included within the document.
- 4.28 The Stage 2 assessment is basic. It appears that following the Stage 1 assessment, the only other planning considerations that have been assessed are:
- Whether the site has previously developed land
 - Whether it has access to public transport
 - What the Agricultural Land Classification is
 - The level of any contamination
- 4.29 The assessment of RN5 concludes that the Site is not suitable or achievable for development but with no explanation for these results. Thus, conflicting with the advice of the PPG.

Suitable

- 4.30 In respect of suitability the PPG (Paragraph: 018 Reference ID: 3-018-20190722) states:

“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”

- 4.31 The Stage 1 assessment concludes that the Site is not constrained in respect of protected ecological sites, irreplaceable habitats (such as ancient woodlands) and is not at risk of flooding. A Technical Appendix was included within the Vision Framework (**Appendix A**) submitted with the R18a and R18b consultations. This confirms that there are no relevant constraints that would preclude development.
- 4.32 It is noted that at paragraph 2.5.2, contamination is considered by MC as a consideration under achievability. It is our view that contamination is a matter of suitability, thus will be discussed here. The Stage 2 assesses the contaminated land at the Site to be 7.07 (high risk) and 8.24 (potential part 2a sites). It is not clear what these units indicate or indeed the scale used.
- 4.33 The Stage 2 assessment also considers the ALC, stating that 100 of the Site is Grade 1. Again the units of the measurement are not clear but it is assumed this is a percentage. As set out within the technical appendix of the Vision Framework, an initial assessment has identified that a large proportion of the Site is likely to be Grade 3B based upon the previous uses. It is accepted that some of the land could be Grade 1 and 2 – as is the vast majority of land to the north and east of Gillingham. However, a large proportion of Medway falls in best and most versatile (BMV) land, and although MC have included draft allocations in the R19 Local Plan that are located on BMV land, MC need to consider the release of more of this land in order to meet its housing needs.
- 4.34 Given the above, and the technical information that has been submitted to MC with the R18 representations, the site is considered entirely suitable for development.

Available

- 4.35 The PPG (Paragraph: 019 Reference ID: 3-019-20190722) explains:
- “A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development.”*
- 4.36 MC has assessed the Site as available and Catesby can confirm this is correct.

Achievable

- 4.37 The PPG (Paragraph: 020 Reference ID: 3-020-20190722) sets out:
- “A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.”*
- 4.38 Catesby is a leading land promoter being part of the Urban and Civic Group, and has a strong track record of bringing sites to the market following local plan promotion and subsequent outline consents. The Vision Framework clearly demonstrate the proposed capacity of approximately 400 homes is achievable. Consequently, the Site should be assessed as achievable.

Adjacent Site Assessments

- 4.39 The land directly to the south east has also been assessed as part of the LAA. Site ID RN8 relates to 24.8 Ha which abuts the Site (RN5) and Site ID RN9 includes RN8 and a further 26.4 Ha to the south east. Importantly, the RN8 in isolation has not been considered suitable or achievable. However, rather miraculously, when an additional 26 Ha is included in the assessment, RN9 is considered to be suitable, available and achievable. Again, there is no explanation as to how MC arrived at these conclusions. However, it clearly demonstrates an inconsistent approach.

- 4.40 It is noted that the only comparable difference in the assessment of site RN5 and RN9 is the difference in the level of contaminated land, which is minimal. Thus, evidence has not been provided to justify that site RN5 is not suitable and achievable in the same way that RN9 is concluded to be suitable. This further demonstrates MC's inconsistent approach in the assessment of the sites within the LAA. Fundamentally, this leads to a flawed evidence based which simply cannot support a justified and effective Local Plan. Without undertaking the LAA again, in a consistent and transparent way, the Local Plan can not be found sound.
- 4.41 It is Catesby's view that the entire area to the South of Rainham Road (RN5 and RN9) is suitable, available and achievable.

Infrastructure Delivery Plan

- 4.42 The NPPF, at paragraph 7, explains that the provision of supporting infrastructure in a sustainable manner is one of the purposes of the planning system. Paragraph 11 sets out the presumption in favour of sustainable development and that plan should promote sustainable patterns of development that seeks to align growth and infrastructure. As such, paragraph 20 requires strategic policies to make sufficient provisions for infrastructure and community facilities. This should be achieved through effective collaboration with other relevant LPAs and stakeholders.
- 4.43 The IDP states at paragraph 1.2.2:
- "This document sets out the mechanisms and level of financial contributions that development proposals will be expected to provide to enable the delivery of infrastructure, to ensure the growth is acceptable in planning considerations"*
- 4.44 And at paragraph 1.2.3:
- "the role of the IDP is to make clear which infrastructure can be delivered to support the Local Plan, taking a reasonable and proportionate view on the matter and accounting for national planning policy on infrastructure provision"*
- 4.45 Paragraph 2.7.1 explains that public consultation has highlighted concerns about the lack of supporting infrastructure and the pressure on local services within Lower Rainham. As such, the allocation of the Rainham Parkside Village (as part of Draft Policy SA10) is required to deliver substantial community infrastructure improvements. However, paragraph 2.7.2 of the IDP is uncertain on the delivery of the requirements of the policy by stating that they 'could' provide up to 750 new homes. Furthermore, the infrastructure listed within Draft Policy SA10, such as land for a new 8FE secondary school are not identified within the proposed infrastructure under 'Education' (pages 32 – 35 of the IDP).
- 4.46 The IDP outlines schemes for 10 road junctions which require mitigation to alleviate capacity issues on the network by 2041. Concept design drawings have also been produced for the mitigation schemes. The 10 junctions which require mitigation by 2041 are listed below:
- Four Elms Roundabout (£51 million to £84 million)
 - Sans Paniel Roundabout (£23 million to £38 million)
 - A228 Peninsula Way/ Dux Court Road/ Bells Lane Roundabout (£1 million to £2 million)
 - A228 Peninsula Way/ Roper's Lane/ Ratcliffe Highway Roundabout (£1 million to £2 million)
 - A228 Peninsula Way/ Main Road Hoo (cost TBC)
 - A2 High Street/ Station Road/ Canal Road Signalised junction (£1 million)
 - Gillingham Gate Gyratory (£18 million to £38 million)
 - Dock Road/ Middle Street/ Wood Street (£1 million to £2 million)
 - M2 Junction 1 (TBC)
 - M2 Junction 4 (to be funded and delivered by the Lidsing Garden Settlement)

- 4.47 The IDP acknowledges that ‘it will be important to monitor and manage the implementation of the package of transport mitigations; it may be increasingly difficult to realise the place-based vision for access and movement once more highway capacity is delivered, which is based on a reasonable worst-case scenario. Development proposals should therefore be incentivised to demonstrate trip generation that would be lower than the vehicle trip credit.’ ...and... ‘achieving a shift towards more sustainable forms of transport could also help Medway to better accommodate proposed housing growth by reducing the amount of additional traffic generated by new residents, helping to address climate change and air quality issues.’
- 4.48 Appendix 1 sets out the Infrastructure Delivery Schedule, which appears to have missed several of the requirements within Draft Policy SA10 and transport infrastructure in the area. Thus, no assessment of the funding, phasing and delivery of these facilities has been made. Consequently, the IDP has not fulfilled its role, as defined by MC at paragraph 1.2.3, to make it clear which infrastructure can be delivered to support the Local Plan. It is questionable how accurate the IDP actually is. As a result the IDP is considered not to be justified or effective in its current form.
- 4.49 Catesby also question whether the level of infrastructure required by Draft Policy SA10 is viable or deliverable by the development of only 863 homes including 750 by SME housebuilder, who are known to have higher buildout costs. The Land South of Lower Rainham Road (RN5), is adjacent to the proposed allocation (Draft Policy SA10) and is able to accommodate some of the infrastructure requirements alongside housing.

Viability Assessment

- 4.50 A key test in the plan making process is to ensure the strategy proposed in the R19 Local Plan must be deliverable over the Plan Period. Paragraph 36 of the NPPF, explains that a Plan should set out the contributions expected from development and such policies for these, should not undermine the deliverability of the plan. PPG paragraph 048 Reference ID: 61-048-20190315:
- “Policy requirements for developer contributions should be informed by proportionate evidence of infrastructure and affordable housing need and be assessed for viability at the plan-making stage in accordance with guidance.”*
- 4.51 As such HDH Planning & Development Ltd has prepared a Viability Assessment (VA) to support the R19 Local Plan. The modelling for Lower Rainham uses the assumptions of 857 homes with a local housing market assessment mix with an emphasis on larger homes. The assessment concludes that the residual values exceed Benchmark Land Values with 30%. However, in the urban areas, development with affordable housing is not viable. Furthermore, in other lower value areas, development proposals are only considered viable at a reduced affordable housing ratio. The Local Housing Needs Assessment (LHNA) sets out an annual net requirement of 436 affordable homes. Given areas such as Lower Rainham are considered viable, with the provision of affordable homes, MC should be seeking to boost housing in these areas to maximise the delivery of affordable housing.
- 4.52 Paragraph 12.42 of the VA sets out that MCs estimated S106 contribution in Lower Rainham is £25,718. It is not clear if this figure would seek to cover all the infrastructure requirements required as part of the draft allocation Policy SA10. As some of the infrastructure will be provided on site, without contribution, it is uncertain if the cost implications have been taken into account. The allocation of further land for more homes and to spread the infrastructure requirements would enhance the prospects of deliverability of housing and affordable housing in this higher value area.

Strategic Transport Assessment

- 4.53 The Strategic Transport Assessment is split into 10 sections and provides evidence to support the R19 Local Plan. The assessment considers forecasting, trip rates, mode shares strategies, junction analysis and modelling and more. In respect of the Mode Share Strategy (Stage 3) and Mode Shares and Trip Rate Assessment Tool to inform the traffic modelling scenarios (Stages 1 and 2) do not consider the delivery of the Rainham Parkside Village (Draft Policy SA10) in detail. It is however acknowledged that there could be a mode shift away from 70% car use at the allocated site. It is positive that Jacobs (on behalf of MC) consider that the Lower Rainham area is able to establish a step change in the transport modes from private vehicle to more sustainable routes. This aligns with the key principles of the proposed growth area across the entire Lower Rainham area. The proposed growth across Lower Rainham will incorporate several community facilities and services leading to shorter and more sustainable trips by the community in the area. This truly embraces the Governments requirements for a vision-led approach to transport that allows for the delivery of well-design, sustainable and popular places.
- 4.54 It is also notable that the IDP states:
- “Achieving a shift towards more sustainable forms of transport could also help Medway to better accommodate proposed housing growth by reducing the amount of additional traffic generated by new residents, helping to address climate change and air quality issues.”*
- 4.55 Thus, MC should incorporate modal shifts to plan for greater growth and accommodate the identified need in the area including unmet needs of other areas.

Local Housing Needs Assessment

- 4.56 Neame Sutton Town Planners has undertaken a review of the housing needs and supply in Medway (**Appendix C**) including consideration of the information with the Local Housing Needs Assessment (February 2025). Most importantly, that the Local Housing Needs Assessment contradicts the housing need identified in the R19 consultation document. Regardless of this matter, it is clearly demonstrated within **Appendix C** that the Local Plan does not plan for the required housing need. Thus, the Local Housing Needs assessment cannot be relied on as an evidence based document.

Duty to Cooperate

- 4.57 Neame Sutton Town Planners has prepared a Statement relating to the legal compliance with the Duty to Cooperate. This Statement is included at **Appendix D**. It is considered that MC has not currently demonstrated the engagement that is legally required during the plan-making process. Notably, there is a lack of documentation of the cooperation between relevant stakeholders on matters such as housing need, infrastructure and cross boundary coordination. This presents a significant risk to the emerging Local Plan.
- 4.58 Several recommendations have been made in section 5 of **Appendix D** and it is considered without prompt action on these matters the Local Plan is likely to not meet the legal tests.

Lacking Evidence Base

- 4.59 To ensure the Plan is sound, it must set out an appropriate strategy based upon proportionate evidence base, in accordance with NPPF Paragraph 36. PPG Paragraph: 038 Reference ID: 61-038-20190315 explains that *“the evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.”*

4.60 The evidence base supporting the MC R19 Local Plan is limited and does not fully justify the strategies within the R19 Local Plan. Further evidence is expected to support the R19 Local Plan including but not limited to:

- An assessment of the open spaces and playing spaces requirements;
- Council wide community infrastructure study;
- A green and blue infrastructure study;
- An Air Quality Assessment;
- Housing Delivery Studies.

Summary

4.61 Table 4.2 below summarises Catesby's comments and positions on the relevant evidence base documents. Reference should also be made to Housing Needs Technical Report (**Appendix C**) and the Duty to Cooperate Technical Report (**Appendix D**).

Table 4.2 summary of Catesby's comments on the evidence base documents.

Evidence Base Document	Comments	Catesby Position on Soundness
Sustainability Appraisal (SA)	<p>The SA does not support an appropriate strategy taking into account the reasonable alternatives. This is because the reasonable alternatives have not been assessed fairly. To ensure the Plan can be found sound it is recommended that:</p> <ol style="list-style-type: none"> The SA should assess an option to deliver additional growth in North of Rainham as indicated in the housing thresholds of the SDOs. The assessment of reasonable alternative sites is updated to reflect a true post mitigation position. A consistent approach, that reflects the SA assessment should be adopted in respect of the selected and rejected sites. 	<p>OBJECTION TO EVIDENCE BASE.</p> <p>Does not support a sound plan</p>
Land Availability Assessment (LAA)	<p>The LAA does not support a justified or effective Local Plan. The LAA should be revisited to take account of the following points:</p> <ol style="list-style-type: none"> Provide clarity on the units of measurement that are used in the assessment (e.g. hectares, percentage, etc.) Provide a clear narrative to the conclusions of the Site assessment, including the specific reasons for discounting sites. Review of the assessment against evidence that has been provided to MC by landowners, promoters and developers through the Local Plan process. 	<p>OBJECTION TO EVIDENCE BASE.</p> <p>Does not support a sound plan</p>
Infrastructure Delivery Plan (IDP)	<p>The IDP does not support a justified or effective Plan. It is recommended that:</p> <ol style="list-style-type: none"> The IDP is updated to reflect the infrastructure required within Draft Policy SA10. Consideration is given to the allocation of all or part of the Land South of Lower Rainham Road (RN5) to 	<p>OBJECTION TO EVIDENCE BASE</p> <p>Does not support a sound plan</p>

support the delivery of much needed infrastructure in the area.

Viability Assessment (VA)	The VA demonstrates that the delivery of housing in Lower Rainham is viable. Boosting housing in this area will support the delivery of much need new affordable homes in Medway.	COMMENTS ON EVIDENCE BASE
Strategic Transport Assessment (STA)	Comments have been provided on relevant parts of the STA.	COMMENTS ON EVIDENCE BASE
Local Housing Needs Assessment (LHNA)	The Local Housing Needs Assessment contradicts the housing need identified in the R19 consultation document. Regardless of this matter, it is clearly demonstrated within Appendix C that the Local Plan does not plan for the required housing need.	OBJECTION TO EVIDENCE BASE Does not support a sound plan
Duty to Cooperate (DtC)	Significant concern is raised in respect of DtC. There is a lack of documentation of the cooperation between relevant stakeholders on matters such as housing need, infrastructure and cross boundary coordination. This presents a significant risk to the emerging Local Plan.	OBJECTION TO EVIDENCE BASE Does not support a legal plan

5. Representations on the R19 Local Plan

- 5.1 Medway's Draft R19 Local Plan will cover the period up to 2041 and will replace the Medway Local Plan 2003. The purpose of the Local Plan is to deliver the social, economic and environmental needs of Medway and the wider area and the R19 Local Plan is considered to be closely linked to the One Medway Council Plan 2024.
- 5.2 This section provides comments on the key aspects of the R19 Local Plan including key strategic policies and general planning policies that are of relevance to Land South of Lower Rainham Road, Gillingham (identified as site RN5 in the Council's LAA).
- 5.3 In accordance with NPPF paragraph 36, the representations submitted below seek to ensure that the Local Plan is positively prepared, justified, effective and consistent with national policy.
- 5.4 When preparing the Plan, MC should be seeking to ensure the matters set out in NPPF paragraph 16:
- 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 planmakers 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;*
 - 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).*
- 5.5 Catesby considers that there are several policies that do not meet this criteria. The drafted policies in general are long and ambiguous not providing clear instruction to the applicant on how to interpret them. It is recommended that all policies are reviewed to ensure they meet the requirements of NPPF paragraph 16.

Chapter 3: Spatial Development Strategy

- 5.6 The Spatial Development Strategy seeks to deliver sustainable development in Medway including meeting the full provision of Medway's Development needs. This accords with NPPF paragraph 11 (a) and is supported by Catesby. However, concern is raised as to whether MC has calculated their housing need correctly. Namely MC should increase its minimum housing requirement to account for its unmet need (at least 3,000 dwellings) and via the DtC, as well as other factors including supporting the necessary strategic infrastructure in MC's IDP (See **Appendix D** of these representations).
- 5.7 Broadly, the spatial strategy seeks to deliver 40% of housing on brownfield land, 30% of housing on extensions to suburban areas and 30% in rural areas including the Hoo Peninsula.
- 5.8 This chapter recognises the need for greenfield development to support the delivery of a range of house types, alongside more flatted developments on brownfield sites. MC acknowledge that brownfield development can take longer to come forward and the impact this can have on housing delivery in the early years of the Plan Period. Catesby agree that the Spatial Strategy cannot plan

for brownfield development alone and that greenfield development can make a significant contribution to Medway's identified needs in accordance with NPPF paragraph 20. This includes the delivery of affordable housing which is less viable on brownfield sites. However, it is not considered that sufficient greenfield sites have been allocated in the R19 Local Plan to allow for sufficient flexibility should there be significant delays in the delivery of the brownfield allocation.

- 5.9 The Spatial Strategy explains that exceptional circumstances have been demonstrated for the release of some Green Belt land, notably, land to the West of Strood (Draft Policy SA6). NPPF paragraph 147, clearly states that before concluding exceptional circumstances exist, the strategic policy-making authority should be able to demonstrate that all other reasonable options for meeting its identified development need have been fully assessed. The evidence base supporting the R19 Local Plan does not currently justify exceptional circumstances. Furthermore, the reasoning for the inclusion of this land is on the basis that Gravesham Borough Council is to deliver the land adjacent but within their administrative area. Given the stage of the Gravesham Local Plan, there is no certainty that this will come forward in line with the Plan Period of MC's Local Plan. Thus it is questionable how deliverable this allocation is.
- 5.10 As set out in Section 4 of these representations, the reporting and assessment of potential sites within the SA and the LAA is inadequate and does not support the soundness of the Plan. For instance, sites such as the Land South of Lower Rainham Road are suitable, available and achievable to come forward and support development in the North Rainham area and provide towards the housing and infrastructure needs. This site should have been considered as a priority over the release of Green Belt land.
- 5.11 Reference is made in Chapter 3 to Rainham Parkside Village (draft Policy SA10) and that the policy requires SME housebuilders to deliver the scheme whilst also adhering to a site-specific rural design code. However, Catesby query whether this is the most effective approach to ensure the site is developed within the Plan Period and to a high rural design standard.
- 5.12 The Spatial Strategy also includes the development of the Medway City Estate (known as the Frindsbury Peninsula Opportunity Area, Draft Policy SA13) which will deliver 690 new homes. Paragraph 14.14.3 of the R19 document sets out the numerous challenges that the redevelopment of this area faces. The Spatial Development Strategy sets out that the redevelopment of this area will extend beyond the Plan Period. However, the Housing Trajectory at Appendix G of the LAA, includes the homes within years 10-15 at a rate of 138 homes per annum. Given the constraints, and MC's own admission that the site will extend beyond the Plan Period, should all the homes within this allocation be included within the housing supply for the Plan Period. Consequently, the MC will need to find further housing opportunities to meet their needs.
- 5.13 MC's draft Spatial Development Strategy refers to the protection of land that has been assessed as high grade agricultural land or (Best and Most Versatile (BMV)). Whilst it is acknowledged that the Site falls within this category of agricultural land, this is not a sufficient reason on its own to not allocate a development site. Instead a balancing exercise needs to be undertaken on the wider availability of this land resource and the housing need and spatial options available for accommodating this need. This is discussed further under draft Policy T14: Rural Economy.

Chapter 4: Natural Environment

Draft Policy S1: Planning for Climate Change - [comments](#)

- 5.14 This policy sets out that "Development shall make demonstrable contributions to significantly progress to net zero carbon emissions by 2041." The policy appears to relate to the shaping of the spatial strategy rather than a tangible development management policy. The drafting of the policy is ambiguous and not obvious what measures an applicants should implement within their schemes.

It is recommended that the entire policy is redrafted with appropriate and deliverable requirements that can be incorporated into a development proposal.

Draft Policy S3: North Kent Estuary and Marshes designated sites - Comments

- 5.15 This policy proposes that new residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England.
- 5.16 Both Land South of Lower Rainham Road and the draft site allocation Rainham Parkside Village (SA10), are located within this zone of influence. Catesby considers that the tariff could have impacts for the viability of large scale development within the zone of influence. There is also the added complexity that Rainham Parkside Village is proposed to be delivered by a consortium of SME housebuilders. Therefore, the impact of this tariff and the level set should be subject to sensitivity testing within the viability assessment to ensure the inclusion of the tariff does not impact the delivery of development.

Draft Policy S4: Landscape Protection and Enhancement - Comments

- 5.17 The policy directs new development to areas with lower landscape sensitivity and emphasises the need to maintain separation between settlements. As set out within these representations, MC should not preclude development coming forward purely on the basis of the separation of settlements. If this were the case, allocations such as Capstone Valley (Draft Policy SA7) could not come forward. Instead, MC should take a landscape led approach to placemaking is progressed to ensure the nature and character of existing settlements is retained.
- 5.18 Although the Site falls within an Area of Local Landscape Importance that spans across Lower Tydwall and Lower Rainham, the wider topography in this area is relatively flat and views of the Site are generally only visible in closer proximity where there are gaps between the boundary hedgerows.
- 5.19 The separation of settlements would not be undermined if Land South of Lower Rainham Road was included as a site allocation and it would create a natural extension to Rainham Parkside Village (draft Policy SA10). Further commentary on the landscape considerations for both sites can be found in **Appendix B**.
- 5.20 The site promotion has focused on a landscape led development to ensure there is no substantial harm to the landscape character. There are a range of landscape enhancements proposed throughout the Site and along the boundaries to prevent and/or mitigate any potential harm to the surrounding landscape. The proposals also include a new section of country park and the housing would be set within three distinctive clusters, reflecting the morphology and landscape characteristics of the surrounding area

Draft Policy S5: Securing Strong Green and Blue Infrastructure - Support

- 5.21 This policy encourages the application of the Green Infrastructure Principles set out in Natural England's Green Infrastructure Framework and green corridors to protect wildlife and create landscape buffers. Catesby support the inclusion of Natural England's guidance to promote strong green infrastructure.
- 5.22 The proposals for Land South of Lower Rainham Road seek to incorporate a network of greenspaces that are connected to one another and to those outside of the site. The open space will provide a variety of benefits to all and serve multiple functions such as for leisure, informal sports, tranquillity, food growing, ecology and other purposes. Catesby understand the positive impact that connected and accessible green infrastructure makes to people and the environment and have sought to incorporate this within the principles of their proposals from the start. Furthermore this

greenspace provision could help to support Rainham Parkside Village (SA10) which could face difficulty balancing the delivery of environmental and landscape enhancements without prohibiting the delivery of development the area needs.

Draft Policy DM1: Flood and Water Management - Object

- 5.23 Policy DM1 seeks to ensure that development is resilient to flood risk, promotes water efficiency, and protects water quality. Development should be directed away from areas at medium or high flood risk, using the Sequential and Exception Tests. The policy addresses flood risk management, adaption to climate change, water supply, wastewater/foul water drainage, water quality and groundwater protection and sustainable urban drainage.
- 5.24 The entirety of the Site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding) and therefore flood risk is not a development constraint. However, Catesby would like to highlight that the wording of this policy needs to remain flexible to ensure it does not contradict National Planning Practice Guidance (NPPG) on the sequential test which is expected to be updated this year. Therefore, it is suggested that reference to the need of a sequential test should be removed as it is addressed in national policy.
- 5.25 In relation to foul water drainage the policy requires development proposals to ensure that adequate wastewater infrastructure is available which are also resilient to the impacts of climate change. The policy continues to set out other requirements in respect of an applicant demonstrating connections to the foul drainage systems. This however, is not the responsibility of the applicant and is a legal requirement for water companies as per The Water Industry Act. As such this should be removed from the policy.

Proposed Amendments to Policy DM1: Flood and Water Management

Deletion of criterion under wastewater / Foul water drainage:

- ~~Development proposals must ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change. Proposals where appropriate must comply with Policy T40.~~
- ~~Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker.~~
- ~~If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). The hierarchy of non-mains alternative solutions must be followed:~~
 - ~~package sewage treatment plants (which may be offered to the sewerage undertaker for adoption) where effluent goes through a wetland prior to discharge into the watercourse/ground as that will improve water quality; then~~
 - ~~septic tanks; then~~
 - ~~in the last instance, a cesspool if no other solution is possible.~~

Draft Policy S7: Green Belt - Object

- 5.26 MC have reviewed their Green Belt and the release of Green Belt land has come forward through the draft allocation of land west of Strood (Policy SA6). However, in accordance with NPPF paragraph 146, MC should be able to sufficiently demonstrate that there are no other opportunities outside of the Green Belt that would be suitable to come forward prior to the release of Green Belt land. In this instance, Land South of Rainham Road is not within the Green Belt and is able to deliver approximately 400 homes.
- 5.27 Catesby do not consider that MC have thoroughly assessed alternative sites outside of the Green Belt that should be allocated first. Furthermore, despite seeking to release land from the Green Belt, the R19 Local Plan still falls significantly short of MC's housing need (see **Appendix D**). Thus MC need to consider further sites for allocation, including to address the unmet need in Gravesham which Land South of Rainham Road would make a significant contribution to. It is for these reasons that Catesby object to the current wording of this draft policy.

Chapter 5: Built Environment

Draft Policy T1: High Quality Design and Amenity - Comments

- 5.28 Whilst Catesby are committed to the broader design considerations set out within this policy, they query whether the draft policy is too specific and lacks flexibility to adapt to site-specific considerations. It is considered the policy could be improved if reference is made to meeting all of the individual criterion as far as practicable, as opposed to expecting all development proposals to meet each individual design consideration. For example, as set out in Paragraph 134 of the NPPF, the purpose of design guides and codes is to provide more detailed guidance and key considerations for new development that is reflective of local features and constraints across Medway.
- 5.29 Furthermore, the policy duplicates requirements already outlined in other policies within the R19 Local Plan, which may lead to confusion, and contradicts the guidance for local plan preparation set out in the NPPF. Thus, to improve the policy's effectiveness and provide greater clarity, it is recommended that overlapping requirements, such as those relating to SuDS and arboriculture should be removed.

Draft Policy DM5: Housing Design – Comments

- 5.30 Catesby are supportive of this policy in its present form, excluding reference to Policy T1 as outlined above, and have accounted for the relevant criteria in promoting Land South of Lower Rainham Road. This approach ensures that any future development will meet the necessary standards while being sensitively designed to reflect the Site's local distinctiveness and character.
- 5.31 However, clarity is required regarding the overlap between this policy and the Medway Housing design standards (2011) which are considered to be severely out of date. MC should also ensure that these policies are specific enough to ensure that the applicant is able to successfully interpret the policy.

Draft Policy S8: Historic Environment - Comments

- 5.32 Policy S8 proposes a strategy to ensure that development proposals preserve or enhance the significance of heritage assets and their settings. MC encourages new development that contributes positively to its local character and distinctiveness.
- 5.33 The aims and aspirations of this policy are supported by Catesby and the development of the Site would avoid any impact to the setting of existing Grade II listed buildings nearby through appropriate buffers and sensitive design considerations.

Draft Policy DM9: Heritage Assets – Object

- 5.34 As set out above, the development of the Site is capable of ensuring there is no harm to the setting of the nearby Grade II listed heritage assets.
- 5.35 Policy DM9 states that development within or that would affect Conservation Areas should be submitted as a full application. However, this is considered excessive for development sites located in close proximity to Conservation Areas and could undermine wider sites coming forward such as site SA10. Outline planning applications for development are already required to submit a Heritage Assessment, in line with MC's validation requirements, which provide a detailed assessment of any impact there may be on heritage assets, without the need for applications to be submitted in full. As such, there is no need to preclude outline applications within or in proximity to Conservation Area. Should this be considered required, it would be a national requirement. As such the policy is not consistent with the NPPF.
- 5.36 Furthermore, there is a designated policy on Conservation Areas (draft Policy DM10) and thus, reference to these areas does not need to be repeated in Policy DM9. Overall, Catesby consider this policy to be ineffective with unjustified requirements that do not meet the tests for plan making set out in Paragraph 36 of the NPPF.

Proposed Amendments to Policy DM9: Heritage Asset

Amendment to criterion from:

To help ensure the delivery of high-quality development and to be able to fully assess the impact of a development, proposals should be submitted as full applications when they are within, or would affect, a Conservation Area

To:

To help ensure the delivery of high-quality development and to be able to fully assess the impact of a development, applications should be supported by a Heritage Assessment.

Draft Policy DM10: Conservation Areas – Comments

- 5.37 Catesby are supportive of the protection of Conservation Areas and consider sufficient mitigation needs to be provided as part of future development proposals for site allocation SA10, given that it is situated between two Conservation Areas Lower Twydall and Lower Rainham. The option to include Land South of Lower Rainham Road as part of a wider site allocation with Rainham Parkside Village (SA10) could help to ensure sufficient mitigation is provided with a commensurate buffer. The design sensitivities associated with the proximity of site SA10 to the Lower Rainham Conservation Area could result in the need for lower densities which the Site (RN5) would help to accommodate.
- 5.38 Overall it is suggested that due to the overlapping themes across draft Policies S8, DM9, DM10 it may be beneficial to condense these historic conservation requirements under one general policy which could help to make Chapter 5 more succinct.

Chapter 6: Housing

Draft Policy T3: Affordable Housing - Comments

- 5.39 Policy T3 sets out MC's approach to securing affordable housing as part of new residential development. The required proportion varies by location and site type, based on evidence from the Local Housing Needs Assessment (LHNA) and the Local Plan Viability Assessment. However, it is still not clear what areas relate to high and low value areas and it is recommended that a policy map is included to ensure clear interpretation of the policy.
- 5.40 In high-value areas, such as the Hoo Peninsula and suburban greenfield sites, 30% affordable housing is required. In lower-value areas, the requirement is 25% on greenfield land and 10% on previously developed (brownfield) land.
- 5.41 Catesby is concerned that due to the fact MC's spatial strategy is reliant on 40% of new housing being delivered on brownfield land, where viability challenges undermine affordable housing provision, this could result in a significant deficit of new affordable housing to meet local need.
- 5.42 As set out in MC's Viability Assessment, Land South of Lower Rainham Road is located in a high-value area and Catesby consider that 30% affordable housing can be provided on the Site which will make a significant contribution to affordable housing need in the area. Especially when combined with the delivery of affordable housing on SA10.
- 5.43 The policy also states that MC acknowledges challenges faced by SME developers in securing registered providers and commits to working collaboratively to address these issues. This will be crucial to ensure a policy compliant level of on-site affordable housing can be prioritised.

Draft Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation - Support

- 5.44 Policy T4 is focused on supporting the development of specialist housing to meet the needs of older people, people with disabilities and other vulnerable groups. Thus the delivery of a wide range of housing types, including care homes, nursing homes and extra care housing is encouraged.
- 5.45 The supporting text for this policy states that modelled projections indicate a significant increase in the need for housing and schemes that provide an element of older person care. Catesby would be willing to explore incorporating an element of C2 provision as part of the development proposals for the site.

Draft Policy T9: Self-build and Custom Housebuilding - comments

- 5.46 The purpose of this policy is to support and enable the delivery of self-build and custom housebuilding across Medway in response to local demand. The current wording of the policy states that larger developments of 100 houses or more must provide at least 4% of plots for self/custom build housing
- 5.47 The Site would have the capacity to deliver this requirement and potentially increase to 5% of plots as part of the development proposals, which would be a significant benefit.
- 5.48 Concern is raised with some of the specific requirements of this policy including the need for self / custom build plots to be located in one attractive area of the site. The word 'attractive' is ambiguous and implies that areas of the site will not be attractive. This contradicts good placemaking. It is also notable that the sales of self/custom build plots can take longer and thus, the requirement to deliver the plot within the early phase of the site could render the remainder of a site undeliverable. MC also state that depending on the location a design code may be required. Not only is this ambiguous but it is overly constraining for the plots which should be guided by the proposed design policies within the Local Plan. Consequently, this policy should be amended to ensure it is effective and allows

self/custom build homes to be brought forward whilst ensuring mainstream market and affordable homes are delivered.

Draft Policy T11: Small Sites and SME Housebuilders - Comments

- 5.49 Policy T11 supports the development of small housing sites, particularly by SME housebuilders, to deliver housing and diversify the local housing market. All dwellings must meet or exceed national and local design standards to ensure a high quality of living for future residents.
- 5.50 Reference is made in this policy to small sites being delivered by SME housebuilders however, they can only be up to 60 units in size to ensure they maintain the character and scale of the local area. Given that the strategy for site SA10 involves delivery through a consortium of SME housebuilders, there is a risk that the individual parcels may not be sufficiently coordinated to achieve appropriate densities and design standards that reflect the character of the local area. Furthermore, Rainham Parkside Village is proposed to be delivered by SMEs in parcels of up to 99 dwellings which is not consistent with draft Policy T11.
- 5.51 Whilst Catesby supports the delivery of housing through small sites and by SMEs, it is questioned whether there is a requirement for such a policy. Each site should be assessed on its own planning merits to ensure that it accords with the development plan as a whole.
- 5.52 The policy encourages the subdivision of larger sites to accelerate delivery and enable SME involvement, provided it is clearly justified. Catesby are supportive of SME housebuilders and the variety and quality they can bring to the housing market. However, there are risks that the bespoke approaches taken by SME housebuilders, which drives their strong reputation, could have a fragmented approach on large development sites such as SA10 and undermine delivery rates. Catesby wish to highlight to MC that the allocation of the Site which neighbours SA10 could help to support the wider infrastructure delivery.

Chapter 7: Economic Development

Draft Policy T14: Rural Economy - Comments

- 5.53 Policy T14 sets out Medway Council's vision for supporting a sustainable and resilient rural economy. The policy aims to enable appropriate economic growth and service provision in rural areas while safeguarding the natural environment, landscapes, and agricultural land.
- 5.54 As set out above in Section 4, the loss of BMV agricultural land was included in the SA Volume 3 as one of the reasons why the Site was not considered suitable for development. However, Catesby disagree with this assessment for a number of reasons. A Desk Based Agricultural Land Classification Review has been undertaken of the Site and the surrounding areas which concluded that all of the agricultural land to the north and east of Gillingham will comprise of BMV agricultural land. Much of the land is likely to comprise of Grade 1 and 2 quality with some areas of Subgrade 3a. Thus the Site is at worst of similar quality to other land in the local area and may represent some of the greatest proportions of lower quality BMV land (Grade 3a).
- 5.55 Overall, the Site is considered to be lower quality BMV agricultural land and the need for this land needs to be weighed up with the acute need for housing and the sustainable and economic benefits the proposed development of the Site could provide.

Chapter 9: Transport

Policy T25: User Hierarchy and Street Design - Support

- 5.56 Policy T25 promotes a design-led approach to street planning that prioritises sustainable and inclusive movement. The draft wording states that major development schemes will be required to

demonstrate how they adhere to a defined user hierarchy, placing pedestrians and cyclists first, followed by transport users, and lastly private vehicles.

- 5.57 The Site is located in a sustainable location in close proximity to local services and facilities in and around Gillingham. There are a range of opportunities that could be explored as part of a future development to enhance and connect sustainable modes of transport with these facilities. For example, on-road cycling on Lower Rainham Road is considered possible as well as enhanced cycle links north to connect the NCN1 cycle route. The existing footbridge over the railway line and in close proximity to the south east boundary can also be improved significantly.

Policy T26: Accessibility Standards - Object

- 5.58 This policy sets out accessibility expectations for major housing developments that have not been allocated in the R19 Local Plan. Developments must demonstrate how residents can access local destinations (e.g. schools and shops) within a 15-minute walk, cycle or bus journey. The draft policy also provides guidance on maximum walking distances for bus stops, depending on the bus service frequency.
- 5.59 Concern is raised in respect of allocated sites and why they are not required to meet the same accessibility standards. Catesby has already expressed that they are concerned about whether the allocated infrastructure is deliverable, especially given the evidence base has not accounted for all the required infrastructure. Thus, allocated sites could become less sustainable rendering the entire spatial strategy unsustainable.
- 5.60 If the Land south of Rainham Road was delivered as part of the Rainham Parkside Village, there would be greater certainty for the required infrastructure to come forward. There is capacity to deliver a range of mixed uses including a 1 form entry primary school and a mixed community/retail unit, community facilities and extensive open space networks. Hence this will help to meet MC's accessibility standards whilst also minimising pressure on existing infrastructure in the area to bring together a wider range of easily accessible amenities for future residents.
- 5.61 The Site is in close proximity to frequent bus services operating on Lower Rainham Road and Catesby would be willing to explore options for local service enhancements. Furthermore, there is the opportunity for sections of rural lanes to be designated for cyclists and pedestrians only, with vehicular traffic diverted through the proposed development which would enhance sustainable transport methods in the locality. There is also an opportunity to improve connectivity and access to the Riverside Country Park from the existing built-up area.

Chapter 14: Site Allocations

Draft Policy SA10: Lower Rainham

- 5.62 Draft Policy SA10 allocates up to 863 homes in the Lower Rainham area comprising one larger allocation of 750 homes at site Rainham Parkside Village (RN9) and three smaller scale allocations. Rainham Parkside Village is to be delivered by 2033, extending beyond the first 5 years of the Plan Period. Catesby support the development of new homes and infrastructure in this area. However, given that MC is not currently planning to meet its housing needs it is considered that this area should accommodate greater growth.
- 5.63 Concern is raised regarding the level of infrastructure requirements sought by this development and whether the level of allocated development can viably support the delivery of it. This is particularly so given the omission of the infrastructure requirements within the IDP and thus, whether these have been considered within the Viability Assessment. Furthermore, criterion 5 of the policy, requires an open space strategy which could identify off-site outdoor sport provision. The Local Plan should plan for all infrastructure need that are required including sports and it should be considered as part of

the allocation if there is a need in the particular area. There is a lack of evidence relating to sport provision. It is unlikely that the allocated site will be able to deliver all infrastructure requirements and the addition of the Land south of Lower Rainham Road could support the delivery of the required infrastructure including sports provision.

- 5.64 Paragraph 14.11.7 of the R19 Local Plan sets out that the development of Rainham Parkside Village will be parcelled into smaller developments of under 99 homes to be brought forward independently by SME developers. Catesby acknowledge the role SME housebuilders have in delivering homes quickly, as stated in NPPF paragraph 73, there is concern that such a fragmented approach to a strategic development could result in infrastructure and important benefits being lost through the process. This is particularly relevant when considered against the recent Planning Reform Working Paper for Reforming Site Thresholds¹ whereby 'medium developments' of 10-49 homes will have a simplified BNG requirement and exemptions from the Building Safety Levy. This could result in a large allocation being brought forward without a holistic approach to such matters.
- 5.65 Criterion 10 of draft Policy SA10 explains that the development will come forward with associated SME Partners under an SME Framework. To ensure the deliverability of this site, it is considered that further evidence is required to demonstrate how this SME Framework will assist in the delivery of the site and who is responsible for the delivery of infrastructure including community facilities, the road network and green infrastructure. This level of information is required as the allocation is to deliver homes within the first five years of the Plan Period and to ensure Draft Policy SA10 is effective.
- 5.66 Paragraph 14.11.8 states:
- "Development proposals in Lower Twydall, to the west of Rainham Parkside Village, will be opposed to conserve the rural setting and to prevent the coalescence of settlements."*
- 5.67 Catesby strongly object to this. MC has failed to consider genuine, high quality placemaking in making such a remark. With high quality design and the integration of green infrastructure development across the entire north of Rainham area is achievable whilst maintaining the existing settlement structure. MC clearly consider this possible through the allocation of Rainham Parkside Village which shares the same characteristic and landscaping constraints as the land to the South of Lower Rainham Road. The Vision Framework (**Appendix A**) supporting these representations and previous representation, demonstrates how three, new, distinct hamlets can sensitively sit within the landscape whilst retaining the structure of Lower Twydall. Furthermore, as set out in **Appendix B**, MC have judged that the perceived landscape harm from Rainham Parkside Village can partly be mitigated through sensitive design and that the benefits of the housing provision outweigh any landscape harm. They have not made the same assessment of the Site despite being located in the same landscape character area with similar landscape qualities. Nor have they recognised the range of landscape features proposed within the Vision Framework and **Appendix B** to adhere to the Landscape Character Assessment's guidance and enable any landscape (and other environmental) impacts to be appropriately mitigated.
- 5.68 Notwithstanding this, MC is clearly accepting of merging settlements in other locations such as the Capstone Valley and has not evidenced why this is inappropriate for this site.
- 5.69 It is also understood that this overly confining statement is on the basis of conserving a rural setting and landscaping. This is also reflected in criterion 6(b) of Policy SA10. Catesby, again strongly object to this. Whilst the need for a sensitive landscape design is supported, the reasoning behind landscaping buffers should be to protect and enhance valued landscapes, not purely to preclude

¹<https://www.gov.uk/government/publications/planning-reform-working-paper-reforming-site-thresholds/planning-reform-working-paper-reforming-site-thresholds>

future development. Evidence to support such a defensible boundary, in landscape terms, is required to underpin such an approach. Currently, this is not justified.

- 5.70 A blanket 'no development' approach to this area is a huge oversight given that the area falls within a higher market value area, is able to deliver affordable homes and infrastructure requirements and is being promoted for a high quality scheme that can support the development needs. The inclusion of such policy restrictions is a significant error by MC and is not a justified or effective approach.
- 5.71 In summary, Catesby is supportive of development in the North of Rainham area. However, there are significant concerns regarding the deliverability of the homes and infrastructure. Significant objection is raised to the unjustified approach to restricting development to the west of the Rainham Parkside Village and Catesby request that a more grounded and flexible approach is taken to ensure any development that comes forward in this area seeks to maintain existing settlement structures and take a landscape led approach.

Proposed Amendments to Policy SA10: Lower Rainham

Deletion of criterion 6 (a):

~~The western edge will be defined by a strong defensible landscape buffer to deter development proposals in Lower Twydall.~~

Insert new criteria:

New Criterion:

- Any development to the west of Rainham Parkside Village will be designed to respect and enhance the rural landscape and maintain existing settlement structures in the area.

Summary

- 5.72 Table 5.1 below summarises Catesby's comments and positions on the relevant evidence base documents.

Table 5.1: summary of Catesby's comments and positions on the relevant Draft Local Plan Policies.

Chapter / Draft Policy	Comments	Catesby Position
Chapter 3: Spatial Development Strategy	An insufficient number of greenfield sites have been allocated in the R19 Local Plan to allow for sufficient flexibility should there be significant delays in the delivery of the brownfield allocations. Furthermore the spatial strategy does not meet MC's total housing need.	OBJECT Not Justified or effective
Draft Policy S1: Planning for Climate Change	The drafting of the policy is ambiguous and it not obvious what measures an applicants should implement within their schemes. It is recommended that the entire policy is redrafted with appropriate	COMMENTS

	and deliverable requirements that can be incorporated into a development proposal.	
Draft Policy S3: North Kent Estuary and Marshes designated sites	Catesby are supportive of protecting the North Kent Estuary and Marshes designated sites from inappropriate development. However, there are concerns that the proposed tariff lacks robust viability evidence at this stage,	COMMENTS
Draft Policy S4: Landscape Protection and Enhancement -	Catesby recognises the importance of protecting Medway's valued landscapes however, they consider the Site can be sensitively designed to balance housing delivery with landscape enhancements.	COMMENTS
Draft Policy S5: Securing Strong Green and Blue Infrastructure	Catesby are supportive of this policy and Land South of Lower Rainham Road is capable of providing ample green and blue infrastructure for existing and future residents.	SUPPORT
Draft Policy DM1: Flood and Water Management	Catesby are broadly supportive of this policy however, reference to the need for a sequential test is unnecessary as updated guidance is provided in national policy. Requirements relating to the provision of foul drainage are a legal requirement for water companies under The Water Industry Act and should not be a planning requirement.	OBJECT Not legally compliant
Draft Policy S7: Green Belt	Catesby do not consider that MC have sufficiently considered other appropriate sites for development that are outside of the Green Belt and appropriate for a site allocation.	OBJECT Not justified or consistent with National Policy
Draft Policy T1: High Quality Design and Amenity	Whilst Catesby are committed to high quality design, this policy is considered to be too extensive and lacks flexibility. Furthermore, the policy duplicates requirements already outlined in other policies within the R19 Local Plan, which may lead to confusion.	COMMENTS
Draft Policy DM5: Housing Design	Catesby are supportive of the overarching principles in this policy however, clarity is required regarding references to outdated design guidance.	COMMENTS
Draft Policy S8: Historic Environment	The aims and aspirations of this policy are supported by Catesby but it is suggested that the wording of draft policies S8, DM9 and DM10 are reviewed.	COMMENTS
Draft Policy DM9: Heritage Assets	Reference to conservation areas in this policy is not considered necessary as they are addressed in draft Policy DM10. Furthermore, there is no evidence to support the need for development proposal near conservations areas to be made in full.	OBJECT Not justified

Draft Policy DM10: Conservation Areas	Catesby are supportive of the protection of Conservation Areas. However, it is suggested that the wording of draft policies S8, DM9, and DM10 are reviewed to avoid repetition and overlap.	COMMENTS
Draft Policy T3: Affordable Housing	Catesby are proposing that Land South of Lower Rainham Road can provide 30% affordable housing provision in line with this policy. They emphasise that due to the viability pressures on brownfield sites to deliver any affordable housing, greenfield development is crucial to meet MC's affordable housing needs.	COMMENTS
Draft Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Catesby would be willing to explore incorporating an element of C2 provision as part of the development proposals at Land South of Lower Rainham Road.	SUPPORT
Draft Policy T9: Self-build and Custom Housebuilding	Catesby are supportive of this policy and Land South of Lower Rainham Road has the capacity to deliver at least 4% self-build / custom housing. The criteria within the policy is restrictive and could result in mainstream market and affordable housing being undelivered. Consequently, this policy should be reviewed.	COMMENTS
Draft Policy T14: Rural Economy	Catesby wish to emphasise to MC that the protection of BMV agricultural needs to be effectively weighed up with the need for new housing and associated economic/sustainable benefits.	COMMENTS
Policy T25: User Hierarchy and Street Design	The proposals at Land South of Lower Rainham Road have the ability to ensure pedestrians and cyclists are prioritised over private car use. Furthermore Catesby are willing to explore opportunities for upgrades to the local bus network.	SUPPORT
Policy T26: Accessibility Standards	Catesby are supportive of ensuring future development provides future residents with good access to local amenities and facilities. Land South of Lower Rainham Road has the ability to make valuable improvements to local cycling and walking networks alongside providing valuable facilities on site such as a primary school.	OBJECT Not effective
Draft Policy SA10: Lower Rainham	Whilst Catesby supports growth and the principle of the allocation in this area, concerns are raised in respect of deliverability without the allocation of further growth, such as with the Land South of Lower Rainham Road. Strong objection is raised to the restrictions to development to the west of Rainham Parkside Village, development in this area should be appropriately managed rather than a blanket restriction applied.	OBJECT Not justified or effective

6. Conclusion

- 6.1 These representations have been prepared on behalf of Catesby in relation to the land south of Lower Rainham Road (identified as site RN5 in the Council's LAA).
- 6.2 It is evident that the ultimate goal of the Medway R19 document is to achieve sustainable development and this goal is supported by Catesby. However, Catesby has identified fundamental issues in the R19 Local Plan and the Evidence Base. These concerns are summarised below:
- There is an insufficient evidence base to support all the strategies and drafted policies within the R19 consultation document. To ensure the Plan is justified, Catesby consider a significant increase in evidence is required including a study reviewing the deliverability of the proposed housing in Medway.
 - The evidence base that is available is incomplete, ambiguous and inconsistent. To ensure that the Plan is justified, the evidence should be revisited to clarify how MC has arrived at the Spatial Strategy and the proposed housing allocations to support this.
 - It is clear from the Housing Needs and Supply Report (**Appendix C**) that MC is not seeking to meet their housing needs. There is a shortfall of at least 3,000 homes and thus the Plan can not be considered to be positively prepared.
 - The Duty to Cooperate Technical Report (**Appendix D**) demonstrates that there are concerns regarding the legal compliance with the Duty to Cooperate and without additional work being undertaken, MC is at serious risk of failure to meet the basic legal requirements of the plan making process.
 - Concerns have been raised regarding the spatial strategy. There is insufficient allocation of greenfield development to balance against the longer delivery rates of brownfield development and to meet the affordable housing needs in MC which are less viable on brownfield sites. Furthermore, the spatial strategy allows for the release of land from the Green Belt when there are reasonable alternatives such as the Land to the south of Lower Rainham Road. Consequently, the spatial strategy is not consistent with national policy.
 - Comments have been provided on a number of draft policies to ensure clarity, duplication and deliverable.
 - Concerns have been stated in respect of some of the drafted policies, namely draft policies S7 (Green Belt) and SA10 (Lower Rainham):
 - Draft policy S7 (Green Belt) – objection is raised to the release of Green Belt land prior to the allocation of other available, deliverable and developable non-Green Belt sites in MC. This is not justified and is inconsistent with national policy;
 - Draft policy SA10 (Lower Rainham) – objection is raised to the policy criteria that restricts development to the west of Rainham Parkside Village. Recognition should be given the benefits that the delivery of the Land South of Lower Rainham Road can add to the Lower Rainham development including ensuring that the allocation can support the delivery of much needed infrastructure in the area.
- 6.3 Catesby thanks Medway Council for the opportunity to provide comments on their Regulation 19 Local Plan. We reserve the right to comment on any further public consultation and look forward to engaging actively in the Examination process.

Appendix A: Vision Framework



GILLINGHAM KENT

A VISION FOR GROWTH AT
LAND SOUTH OF LOWER
RAINHAM ROAD

Contents

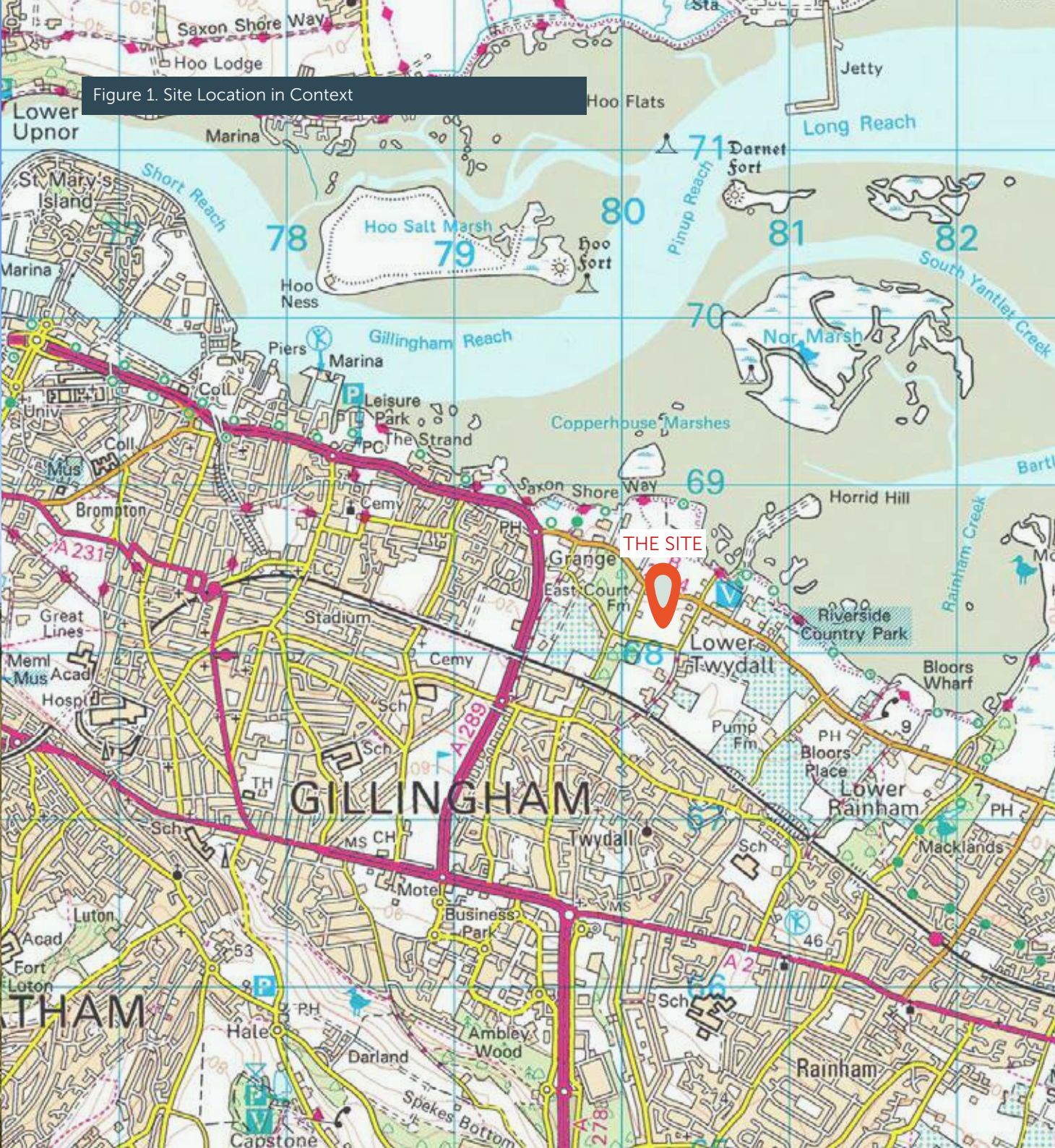
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VISION:
Creating three
distinct hamlets to
support an enhanced
and productive landscape
in the Kent Fruit Belt

Revision	H
Author	AP
Issue Date	27/02/2023

Figure 1. Site Location in Context



Introduction

To support growth and prosperity of the Medway, and to help the Council meet their housing needs, new strategic sites need to be identified to deliver high quality, sustainable growth.

This document presents Catesby Estates proposals for a new landscape led residential allocation on land parcels to the south of Lower Rainham Road, Gillingham. It is submitted in response to Medway Council's emerging Local Plan (to 2040) 'Call for Sites 2022' consultation.

This document presents the real opportunity to deliver circa 400 sensitively located new homes in the form of three distinctive organically grown hamlets, all set within an enhanced, productive and complementary landscape setting.

Catesby Estates recognises the valued landscape within which the proposals are located and seeks to sensitively work within this framework, through supplementing and enhancing key characteristics and functions of the area. This includes:

- The creation of extensive areas of new publicly accessible open space, relieving visitor pressures on existing local open spaces and particularly the Riverside Country Park and associated Medway SSSI.
- Enhancements to the landscape quality and character in this part of the locally valued landscape supporting distinction between development clusters and hamlets and reinforcing the overall landscape contribution.
- Provision of indoor and outdoor community and education opportunities supporting the function and sustainability of residents in this part of the district, and connecting communities with the heritage and identity of this part of the Kent Fruit Belt.

Site & Context

The Site is located to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. Gillingham is a conurbation comprising a series of historic hamlets and villages. The town is within the administrative boundary of Medway Council - a unitary authority.

The Site, is located to the south of the Lower Rainham Road and north of the Lower Twydall Conservation Area. The Site comprises a series of linked and individual agricultural fields (Figure 2).

The local roads of Eastcourt Lane, Grange Road and Lower Twydall Lane pass between and bound the cluster of fields to the west. An historic and remediated chalk pit is located within the eastern cluster of fields, the extents of which are defined by the mature tree and hedgerow lines.

The Site has a gradual incline in ground level from Lower Rainham Road at around 7m AOD to 17m AOD along the southern boundary. There is a man made localised high point at around 25m created by remediation of the chalk pit.

Neighbouring Context

Agricultural land and commercial orchards to the east of the Site, were the subject of an outline planning application (Medway Ref:MC/19/1566) and subsequently a planning appeal for:

“Redevelopment of land off Pump Lane to include residential development comprising approximately 1,250 residential units, a local centre (with final uses to be determined at a later stage), a village green, a two form entry primary school, a 60 bed extra care facility, an 80 bed care home and associated access (vehicular, pedestrian, cycle): Outline application with access for consideration (matters reserved scale, appearance, landscaping and layout)-Environmental Impact Assessment Development”.

The appeal was recovered by the Secretary of State (SoS) and was refused on 3 November 2021. The Inspector's report appraised the Pump Lane scheme and concluded that permissions could not be granted for the development, with the main reasons for refusal relating to:

- Adverse landscape and visual impacts harming the character and appearance of the countryside between Lower Rainham Road and Twydall/ Rainham;
- Residual cumulative impact on local highway network

Catesby Estates have carefully reviewed the Inspector's decision and through this document we seek to demonstrate how our proposed development would positively perform in this location, such that it will work sensitively with the valued landscape and enhance the character and appearance of the countryside. The report will also demonstrate how steps can be taken to mitigate impacts on the local highway network arising from the development.

Planning Context

Medway Council are currently preparing a new Local Plan which is to replace its outdated 2003 Local Plan. The Government's Standard Method indicates a housing requirement for over 37,000 new homes over the Plan period. Whilst development of the Hoo Peninsula has achieved HIF funding and is planned to deliver in the region of 12,000 homes, this is a proposal which will take time to deliver and the outstanding requirement remains significant. In order for the Council to meet its housing requirement and maintain a 5 year housing land supply the Local Plan will need to allocate green field sites which can provide housing in the short term.

Land at Lower Rainham Road is well placed in relation to the key settlements of both Gillingham and Rainham which provide a full range of facilities to meet resident's needs. There are also opportunities to provide key facilities on the Site such as a new primary school, playing fields and community buildings which will provide benefits to both future and existing residents.

This Site can make a significant contribution towards the Council's housing requirement and the majority of the dwellings can be delivered in the first 5 years of the Plan.

Figure 2. Site Boundary



RIVER MEDWAY

Lower Rainham Road

Lower Twydall Lane

Pump Lane

LOWER
RAINHAM

TWYDALL



Site Boundary

The Opportunity

THE CONTEXT

The Lower Rainham Farmland Landscape Character Area (LCA) and the Area of Local Landscape Importance (ALLI) policy designation, confirms that the existing landscape character is predominantly agricultural in nature. However, it does also contain existing hamlets and clusters of historic and more modern 20th century ribbon developments, particularly in the area of focus. The clusters have grown along the roads and lanes through this part of the LCA and create a 'transitional urban fringe character'.

This proximity to surrounding, mature urban areas and the range of services and facilities serving the existing communities supports the sustainability of this location for development.

The use and form of the fields within the Site are arable/ grazing land and include areas of horse paddocks and stables and a former chalk pit which is now remediated, capped and grassed over. This part of the ALLI does not contain orchards or other characteristic landscape features and would benefit from landscape enhancements that can be enabled by new development.

AN OPPORTUNITY FOR ORGANIC AND LOGICAL GROWTH

New clusters of organic growth can be sensitively located along the established movement routes and between existing development clusters. This follows the logic and established morphological patterns of development within this part of Medway. New population in the area will also support the provision of community uses such as a primary school, community building and a local shop reducing the need for existing residents to travel out of the locale for day to day requirements.

Alongside the clusters of development, enhancements to the landscape character can be made to not only create distinction and clear identity between the development clusters, but to supplement and enhance the overall landscape character of the wider LCA and ALLI. By contrast to the private land holdings through the rest of this area, the new landscape will be publicly accessible providing a significant benefit to the wider population of the area.

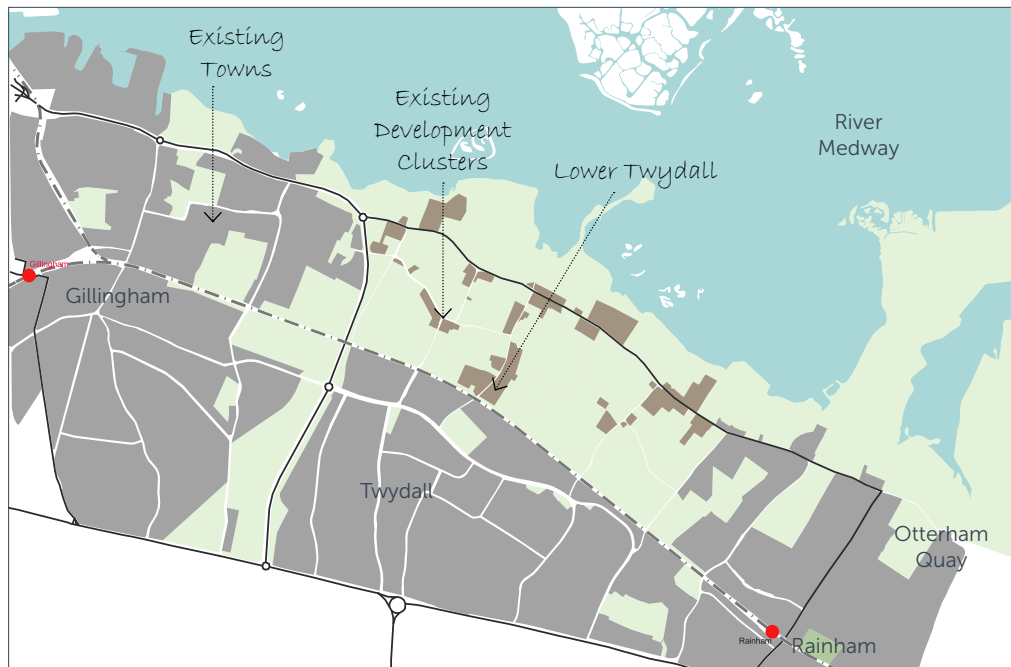


Figure 3. Existing Settlement Pattern

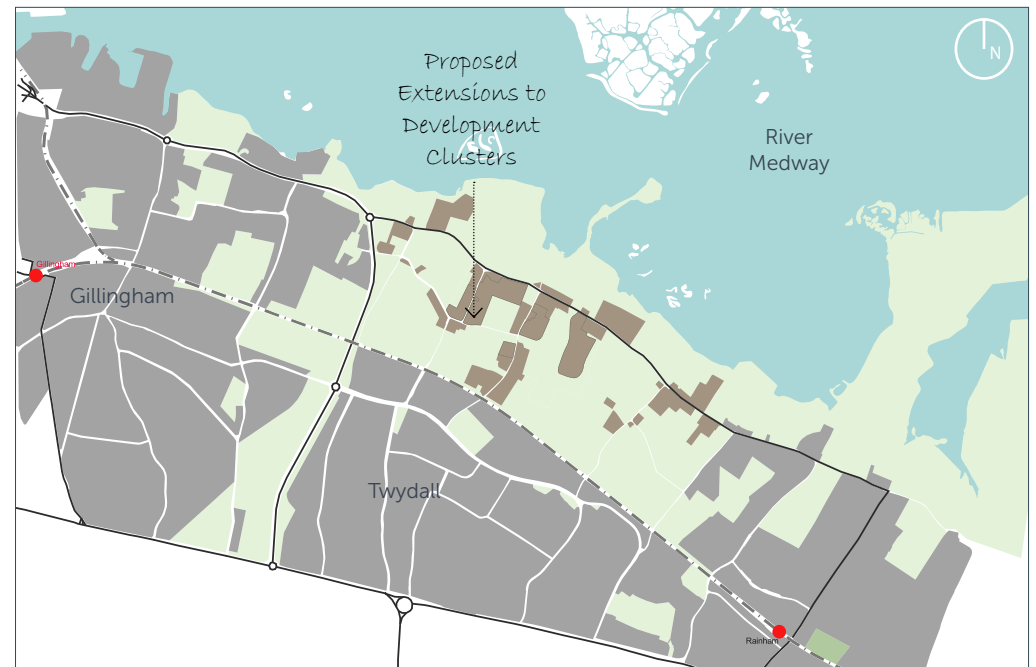


Figure 4. Logical Organic Growth of Cluster / Hamlets

Design Principles

DISTINCTIVE HAMLET/ CLUSTER CHARACTERS

- 1 **Wooded Hamlet.** Working alongside the existing dwellings on Eastcourt Lane / Grange Road, this will be the largest of the three residential clusters and will contain an area to accommodate a community hub comprised of uses such as a 1 FE Primary School, community facility and/or retail uses, and recreational uses all set within an extended wooded landscape.
- 2 **Farmstead Hamlet.** Reflecting the existing farmstead characteristics along Lower Twydall Lane and the conservation area at its southern end, new development in this cluster will be linear in nature and adopt farmstead layouts. A mixed of wooded and parkland landscape will characterise this hamlet.
- 3 **Market Garden Cluster.** Providing a transition between the 'urban fringe character' to the west and the productive landscape to the east, the market garden cluster will be defined by development set within a productive landscape.



Figure 5. Delivering Three Distinct Clusters / Hamlets

A PRODUCTIVE AND ACTIVE LANDSCAPE

- 4 **Wooded Extension.** Extending the wooded character from the west and south in and around the Wooded Hamlet and creating a visual distinction between the proposed dwellings and the more open landscape character to the east.
- 5 **New Country Park.** Utilising the elevated ground and landscape features of the remediated chalk pit area, and connections to the Riverside Country Park, a new country park will be created. Supporting the existing and proposed population and relieving visitor pressure from the existing Riverside Country Park, this area will provide new looped footpath routes, recreation and connections between the new hamlets and clusters.
- 6 **Productive Landscape.** Recognising the productive landscape character to the east and the transitional nature of this part of the Site, an area for community allotments and orchards will be provided. This also links to the character of the Market Garden cluster. Elements of productive landscape and outdoor education opportunities can be incorporated throughout the landscape area.



Figure 6. A New Productive and Active Landscape Linking the Hamlets / Clusters

Landscape Character Review

The following table provides a summary of the baseline landscape character of the Site, the potential impacts and mitigation approaches that can be employed. This analysis has helped to shape and support the proposals for land south of Lower Rainham Road as illustrated within this Vision document.

Resource / Receptor	Baseline Conditions	Potential Impacts / Mitigation
Landscape Fabric	<p>The Site comprises approx. 30ha of arable / grazing land. This includes an area of horse paddocks with stables; and a former chalk pit which has undergone remediation and is now capped / grassed over.</p> <p>The parcels of land are generally enclosed by mature trees and hedgerows, although some boundaries are low and gappy.</p> <p>There are no orchards within the Site.</p>	<p>The proposed development will result in the loss of undeveloped land but will not result in the loss of any orchards or other characteristic landscape features.</p> <p>The vast majority of trees and hedgerows around the perimeter of the Site would be retained and enhanced, and incorporated into the proposed green infrastructure network.</p> <p>The proposed green infrastructure network will occupy in excess of 50% of the total site area, and will include new productive landscapes, orchards, trees and hedgerows mirroring the wider landscape characteristics of this area.</p>
Landform	<p>The Site itself is relatively flat, sloping from the south-west to the north-east across gentle gradients.</p> <p>A localised high point is located at the former chalk pit that has been remediated and infilled.</p>	<p>No significant earthworks are proposed and the gently sloping topography of the Site would be retained, with localised changes to accommodate suitable development platforms and drainage features.</p> <p>The former chalk pit would be incorporated as part of the proposed green infrastructure network, contributing to the creation of a new country park area.</p>
Settlement and Landscape Character [Lower Rainham Farmland Landscape Character Area]	<p>Key characteristics of the Landscape Character Area include:</p> <ul style="list-style-type: none"> • A mixed pattern of orchards, arable and grazing land; • Some neglected pockets of land and sense of suburbanisation; and • Smaller hamlets of Lower Rainham and Lower Twydall which include Conservation Areas. <p>Key issues / guidelines include role of the landscape as a green link between the built-up area and Medway Estuary / Riverside Country Park; the poor accessibility to the landscape; the restoration and creation of orchards; and the long-term management of landscape features.</p> <p>In addition to Lower Rainham and Lower Twydall there are various pockets of development within the landscape, namely along Lower Rainham Road; Lower Twydall Road; Grange Road; and Eastcourt Lane</p>	<p>The proposed development will result in the loss undeveloped land but will not result in the loss of other characteristic landscape features. Parts of the Site – such as the horse paddocks and former chalk pit – are also relatively less sensitive to change.</p> <p>The concept of three distinct development hamlets / clusters will ensure that the overall landscape and settlement pattern – of clusters of development set within an established landscape framework – will remain. There will be no impact on the setting of Lower Rainham, and there will remain a landscape setting to Lower Twydall in order to protect the character of this historic hamlet.</p> <p>The proposed green infrastructure network will separate these neighbourhoods and ensure that they are well integrated into the landscape. The green infrastructure network also ensures there will remain green linkages between the built-up area and Medway Estuary; will improve access to the landscape; and will allow for the creation of new orchards.</p> <p>All existing and proposed landscape features will be subject to long term management. The opportunity exists for the landscape to be managed as part of Riverside Country Park or by local groups.</p>

Resource / Receptor	Baseline Conditions	Potential Impacts / Mitigation
Views and visual amenity	<p>Views across the Lower Rainham Farmland Landscape Character Area are generally limited by the relatively flat topography; mature trees and hedgerows along field boundaries and roads / lanes; and intervening development.</p> <p>Views of the Site are generally only visible in relatively close proximity, where Site boundary features are low and gappy. The Site is typically seen in the context of existing built development along Lower Rainham Road; Lower Twydall Road; Grange Road; and Eastcourt Lane.</p> <p>Further north, from within the Riverside Country Park, the Site is not generally visible due to intervening vegetation within the Riverside Country Park and views are of a 'wooded' horizon with glimpses of development in and around Lower Rainham and on higher ground to the edge of Gillingham.</p>	<p>The proposed development is unlikely to be a prominent feature in views, assimilated into the landscape by existing and proposed vegetation. Where visible, residential development is not considered to be an uncharacteristic feature of existing views.</p> <p>The concept of three distinct development Hamlets / clusters - separated by green infrastructure - will further ensure the proposed development is not visually prominent and that there is a degree of screening around each cluster.</p> <p>From the Riverside Country Park specifically there will no open views of the proposed development and there would remain views of a 'wooded' horizon, a feature which will be enhanced by the development approach proposed.</p>
Gillingham Riverside Area of Local Landscape Importance (ALLI)	<p>The ALLI is described as a predominately rural landscape - containing a number of orchards - which provides a green backdrop to the Medway Estuary and buffer between the built-up areas of Twydall / Rainham and the Medway Estuary. It also provides access from the built-up area to the more rural landscape.</p>	<p>The proposed development will result in the loss of undeveloped land, but is designed to work organically with the existing morphology of the existing settlement and landscape pattern.</p> <p>There will remain a green buffer between the built-up area and the Medway Estuary - and a wooded, green backdrop to the Medway Estuary - with green infrastructure separating these development clusters and ensuring they are well integrated into the landscape.</p> <p>The proposed development will not result in the loss of any characteristic orchards or other notable landscape features, and new locally characteristic landscape features will be created as part of the green infrastructure network. The green infrastructure will be publicly accessible, improving access to wider landscape.</p>
Rural Lanes	<p>Grange Road, adjoining part of the Site is designated as a rural lane which are of landscape, amenity, ecology and heritage value.</p>	<p>The proposed development will not result in the loss or modification of Grange Road; the hedgerow along Grange Road will be retained / enhanced through new tree planting; and development would be set back from the road corridor.</p> <p>The opportunity also exists for sections of rural lanes to be designated for cyclists and pedestrians only - with vehicular traffic diverted into the proposed development - which could further improve character / access to the landscape.</p>
Access and Recreation	<p>The Site is not publicly accessible and contains no public footpaths, bridleways or cycle routes.</p> <p>The Riverside Country Park is located to the north of the Site. Access to the Country Park is via a number of 'lanes' connecting from Lower Rainham Road.</p>	<p>The proposed development will not result in the loss or modification of any area of public open space or routes.</p> <p>The proposed green infrastructure network will occupy in excess of 50% of the total site area, providing a range of new routes / spaces and enhancing access to the landscape.</p> <p>The opportunity also existing to improve connectivity and access to the Country Park from the existing built-up area.</p>

The Concept

The Illustrative Concept Masterplan shows one design response for the Site as a stand alone development, but also a response which could easily integrate into a linked and comprehensive development scheme should adjoining sites come forward.

Development of the Site can deliver the following benefits:

- Around **400 new homes** in a mix of sizes and types set **within three new distinctive hamlets / clusters** influenced by the established morphology and landscape characteristics.
- Policy compliant provision of **affordable housing** in a mix of sizes and tenure responding to identified local need with the possible inclusion of up to 5% self-build plots and accessible homes for the elderly.
- Potential to accommodate **a new community hub containing a new 1 FE (form entry) primary school site, community rooms and local retail**, alongside a **network of community growing and environmental education spaces**.
- Delivery of a range of **new children's play areas** within an extensive open space network.
- Enhanced **pedestrian and cycle links** to Twydall supporting sustainable routes to existing services and facilities.
- An **extensive multi-functional open space**, landscape and biodiversity network accommodating existing features as well as providing new, diverse landscape planting and enhanced ecological habitats.
- Delivery of a **new country park** landscape through which a network of pedestrian routes can pass and link between the three hamlets. Linked to the Riverside Country Park this can relieve visitor pressures and offer new residents a significant area to spend leisure time.
- Creation of new **linked footpath and leisure routes** through the development and open space network. The opportunity to enhance or provide **new safe routes to surrounding community and leisure uses** will be explored.
- Provide **appropriate separation to the Lower Twydall Conservation Area**, while also providing new homes in a highly sustainable location.

- 1 Market Garden Cluster
- 2 Community Allotments
- 3 Community Orchards
- 4 New Country Park with recreation and play facilities and views towards the Estuary
- 5 Footpath / Cycle Network
- 6 Farmstead Hamlet
- 7 Woodland planting
- 8 Wooded Hamlet
- 9 Community Hub (1 FE Primary School, Community Room/ Local Retail)
- 10 Public Open Space
- 11 Footpath links to Riverside Country Park
- 12 Enhanced footpath / cycle links to Riverside Country Park and NCN1 cycle route.
- 13 Enhanced railway footbridge links to Twydall

Figure 7. The Concept Diagram



A Sustainable Location

The Site is located within good proximity to a significant and wide range of facilities and services in and around Gillingham. This includes railway stations; national supermarket chains; healthcare providers; education facilities; recreation; and community uses.

We are aware of the Inspector's appeal decision at Pump Lane with regard to concerns relating to impacts on the highway network. Our proposals include a range of features which encourage internalised movement trips as well as a green travel plan promoting sustainable and active transport. This includes:

MIXED USES

- A 1 form entry primary school and a mixed community / retail unit;
- Provision of community facilities; and
- Extensive open space networks on site.

WALKING / CYCLING

The Lower Rainham Road Site is located in close proximity to a range of Public Rights of Way and National Cycle Network (NCN1) also routes.

On-road cycling on Lower Rainham Road is considered possible for more proficient cyclists (40mph carriageway).

Opportunities to provide enhanced cycle links north to connect with the NCN1 cycle route will also be explored.

The existing footbridge over the rail line to the south of the site provides existing links to facilities in Twydall. The bridge has shallow steps supporting use by pedestrians, cyclists and the ambulant disabled. As part of any development there is the potential to further enhance the attractiveness and pleasantness of this route and bridge crossing, such as providing low-level sensor street lighting, vegetation removal, CCTV, and signage.

PUBLIC TRANSPORT

The Site is in close proximity to frequent bus services operating on Lower Rainham Road. Arriva and Nu-Venture are local providers in the area, and are be sensible partners to provide a public transport strategy for the Site. At this time we would look to explore options for service enhancements on the following routes:

- Arriva Service 1 – services to/from Gillingham and Chatham (town centre, bus station, rail station)
- Nu-Venture Service 131 – services to/from Rainham and Rainham rail station

A public transport strategy will also include information and incentives to encourage residents to use services. This would include:

- Household Welcome Packs for each household containing public transport information.
- Advertising Arriva's smartphone Apps (online tracking, service times, ticketing).
- Providing each dwelling with a pre-loaded Smartcard to provide a few weeks' free bus travel.

It is also recognised that Medway Council are seeking to introduce more electric buses in to the area, both as a way of reducing emissions but also to support the improvement of air quality standards, particularly through the AQMAs (Air Quality Management Areas).

Development of this Site, in collaboration with Arriva and Nu-Venture and improving technology, offers a real opportunity to achieve this objective and provide quiet and clean bus services along Lower Rainham Road.

FUTURE GAME CHANGERS

The current and future innovations in transport technology and changing working / shopping habits in a post-Covid-19 era also offer great opportunities to develop a community with a reduced reliance on private motor vehicles and supported by sustainable movement options.

Some new technologies that will be integrated into the development scheme to aid the move to more sustainable transport options include:

- Electric Charging Hubs where e-bikes, e-scooters and electric pool cars can be hired by residents to support short journeys to local facilities in and around the area.
- Household electric charging for vehicles.
- Mobility as a Service (MaaS). Through the use of joint digital channels, users can plan, book and pay for multiple types of mobility services, creating linked trips and supporting a move away from personally-owned modes of transportation.
- Smart autonomous deliveries / autonomous pods / drone delivery
- 5G network and superfast broadband support working from home capability and reduce the need for regular commuting patterns.

Other Matters & Conclusion

Deliverability

The NPPF and the Government’s growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. To be considered deliverable sites should meet the following tests:

- Be Available
- Be Suitable
- Be Achievable

The Site satisfies each of the NPPF criteria as follows:

Available

Catesby Estates have agreed terms with the owners of the land to promote it for residential development. Catesby Estates is committed to the delivery of high quality homes and associated environment. This will provide much needed housing in an attractive and sustainable location.

The concept masterplan illustrates that the Site could deliver circa 400 new dwellings. On average from the date of an outline consent to start on site is around 20 months for our schemes. As such this Site could start delivering housing numbers early in the plan period.



Suitable

The site is suitable for housing development because it:

- Is a suitable and sustainable location in relation to existing movement, facilities and service infrastructure;
- Is land available for immediate development which can be delivered holistically with a range of supporting infrastructure and facilities;
- Has no identified environmental constraints that would prevent it from coming forward for residential development;
- Will deliver public benefit in addition to new housing, including much needed affordable housing and community uses all set within an extensive multi-functional landscape; and
- Is highly sustainable as it is within walking distance to local services and facilities and is served by existing public transport provision on Lower Rainham Road. This could be enhanced through improvements to service frequency as a direct result of this development proposal.



Achievable

The concept masterplan illustrates that the site could deliver circa 400 dwellings, with associated community infrastructure and an extensive landscape and public open space network. This will make a significant contribution towards meeting the housing needs of the area while supporting character enhancements to the local landscape all set within a sustainable location.



CONCLUSION

This Vision Framework and the accompanying supporting technical documentation identifies that the Site has no restricting constraints for development. It is considered that this Site should be included in the Council’s Local Plan as an allocated site for a residential led development.

TECHNICAL APPENDIX

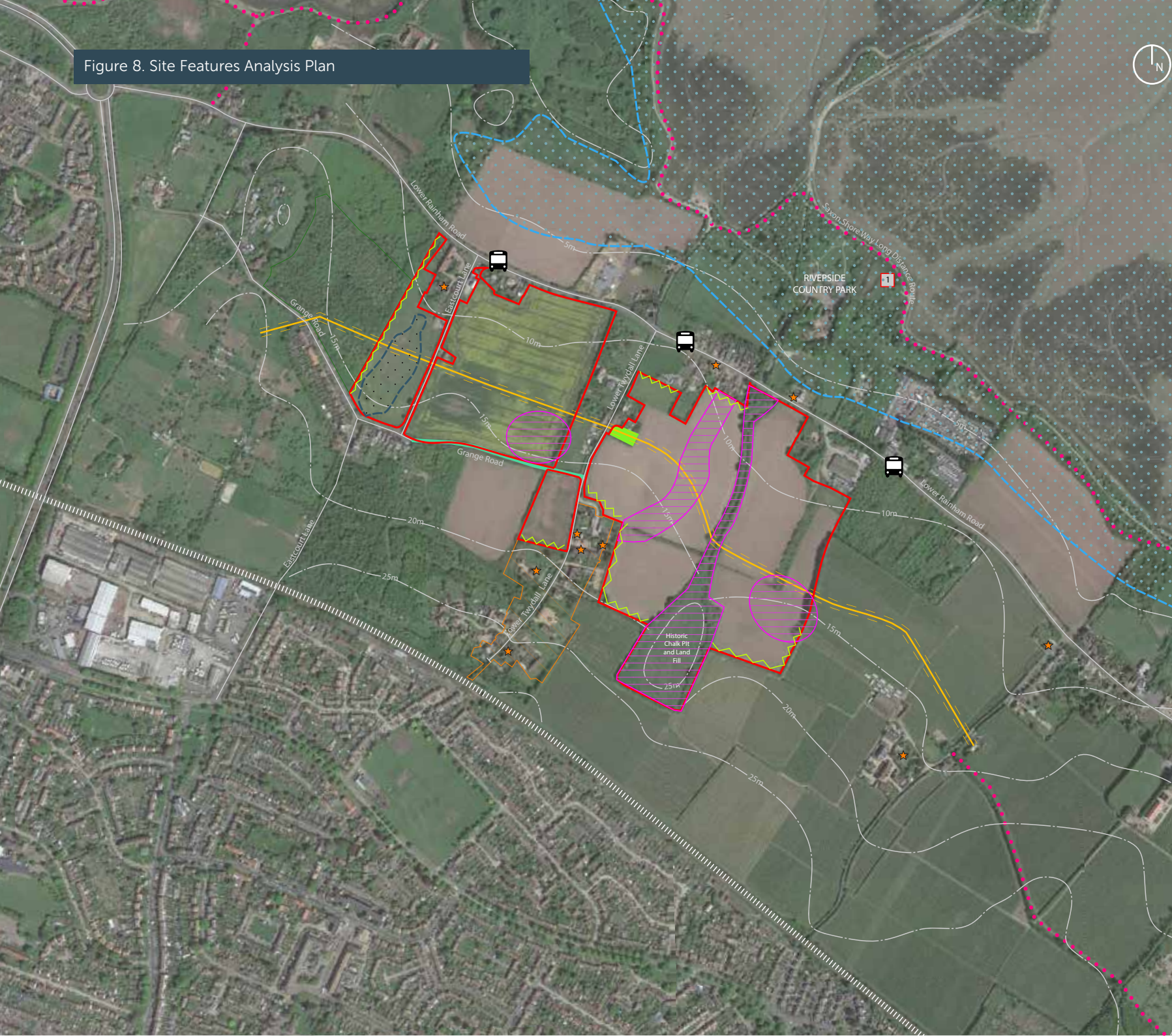
Site Features Analysis

Following analysis of environmental and technical features of the Site the following table and plan confirm that there are no significant physical, environmental or technical constraints to developing the site for residential use. This plan underpins the development rationale and concept masterplan section of this document.

Feature	Summary
Topography	The Site has a gradual rise from around 8m AOD at the Lower Rainham Road boundary up to around 17m AOD along the southern boundary. A localised, man made high point is evident at around 25m AOD and relates to the chalk pit and subsequent land fill zone.
Noise	The road network surrounding the Site produces a background noise level which will be assessed and where required, mitigated through the design and orientation of the proposed development.
Ecology	Habitats of elevated value include the hedgerows and mature trees. Surveys for bats, reptiles and breeding birds are being completed, and appropriate mitigation can be provided. There are also significant opportunities for biodiversity enhancement through green infrastructure provision on Site.
Ground Conditions	Areas with potential for ground instability have been identified, and advised as areas of no build. Where required access routes can be taken across these areas. These areas can also be used as public open space contributing to the future open space network on Site.
Flood Risk & Drainage	<p>The Site is located in Flood Zone 1 (EA mapping), and is not at risk of flooding from rivers, sea or reservoirs. A small area of existing surface water flooding is evident in western most field. This will be resolved as part of the development solution.</p> <p>Sustainable drainage features will be accommodated on site to attenuate surface water run off generated by development of the site. The outfalls will be into the Lower Rainham Road to connect to the headwall to the north into the Medway.</p>
Highways, Access & PRow	<p>Primary Accesses into the Site will be from the Lower Rainham Road.</p> <p>Existing roads will be retained and integrated within the new layout, with some dwellings served from the existing roads.</p> <p>Pedestrian access to existing bus stops on Lower Rainham Road will be provided, and enhancements to connections to Lower Twydall Lane pedestrian bridge will be explored. New pedestrian routes will be provided throughout the Site, particularly connecting to new and existing open spaces and between clusters / hamlets.</p>
Utilities	A 1.5m foul pipe line passes through the Site on an east/west alignment. A 12m no build easement corridor (6m either side) is indicated. Primary and secondary roads and associated corridor can be built within the pipeline easement.
Best & Most Versatile Land	An initial assessment has been undertaken and identifies that the majority of the Site is likely to be Grade 3B, based on previous uses. There is a possibility that some of the land could be Grade 1 and 2. Whilst the Site can be classed as Best and Most Versatile (BMV), all agricultural land to the north and east of Gillingham is classified as BMV and therefore this should not be a barrier to future development.

Feature	Summary
Landscape & Arboriculture	<p>The Site and immediate surroundings fall within an area locally designated as an area of Local Landscape Importance (ALLI). The River Medway and adjacent mudflats to the north of the Site are designated as the North Kent Marshes Special Landscape Area. Grange Road, in part adjacent to the Site, is locally designated as a Rural Lane. The layout of development should work with the existing landscape pattern and a strong green infrastructure network should be created to ensure that the area continues to function as a green buffer separating the built-up areas of Twydall and Rainham from the Medway Estuary.</p> <p>The boundaries of the Site and field boundaries within the Site are generally defined by hedgerows with occasional trees. Where possible these features will be retained and integrate within the development layout, where removed to facilitate appropriate layouts/access then new planting will be provided within the public realm and open spaces.</p> <p>The former chalk pit and access off the B2004 are defined by established hedgerows with hedgerow trees. The Site of the former chalk pit is elevated above surrounding levels providing a view to the Medway. This view would be retained and the former chalk pit would form part of the green infrastructure proposals that includes the provision of parks and open spaces, areas for formal and informal play, orchards and wildlife habitats.</p>
Heritage	<p>Lower Twydall Conservation Area (CA) is accessed from Lower Twydall Lane and contains five listed buildings within the CA boundary.</p> <p>Appropriate buffers will be provided to this area to retain its distinctive character as a defined hamlet and to respond to the setting of the listed buildings as appropriate.</p> <p>Individual listed buildings are also located on Lower Rainham Road and Eastcourt Lane in relative proximity to the Site. Buffers will be provided within the Site to respond to the setting of the listed building as appropriate.</p> <p>The archaeological potential of the Site will need to be investigated further to inform the layout of any future scheme, in particular to avoid impacts on any deposits that contain Palaeolithic artifacts.</p>

Figure 8. Site Features Analysis Plan



- Site Boundary
- Lower Twydall Conservation Area Boundary
- ★ Listed Buildings
- ⋯ Existing Public Rights of Way and Saxon Shore Way
- National Sustrans Cycle Route 1
- 🚌 Existing Bus Stop
- Extent of EA Flood Zone 3
- Areas at Medium to High Risk of Surface Water Flooding
- Potential No Build Zones due to ground conditions
- Existing Traditional Orchard Area
- Foul Sewer with Easement - 15m corridor (6.5m either side of 1.5m diameter pipe)
- ~ Landscape Buffer Zone
- Rural Lane Policy

TECHNICAL APPENDIX

Access and Movement Analysis

The Site lies to the south of Lower Rainham Road (B2004) which provides access to Lower Twydall Lane, Eastcourt Lane, Lower Featherby Road and Grange Road. The Site is 6km from Junction 3 of the M2.

A number of buses operate within the local vicinity as identified at Figure 9. The nearest bus stops to the Site are on Lower Rainham Road, and approximately 1km south on Beechings Way.

Bus stops along Lower Rainham Road are served by the number 1 and 131 services. The No. 1 operates an hourly service between Chatham and Riverside Country Park on Sundays. The 131 service travels between Medway Maritime Hospital and Maidstone (via Rainham Railway Station) from Mondays to Fridays, every 1 to 2 hours.

The Beechings Way bus stops are served by the 101, 183 and 116 services. The 101 service operates between Gillingham and Maidstone (via Brompton and Chatham Railway Station); every 30 minutes from Mondays to Saturdays and hourly on Sundays. The 183 service operates two journeys every weekday between Twydall and Asda Gillingham. The 116 service travels between Chatham and Hempstead Valley (via Gillingham) from Mondays to Saturdays, every 30 minutes.

The 116 service can also be used by those who need to travel to education facilities such as St Augustine School, Byron Primary School, Mid Kent College and the Universities at Medway. In terms of other school buses, Medway Council provide a MY school bus service which provides students with specific bus services to their school destination.

A network of Public Rights of Way (PRoW) connect Gillingham to neighbouring settlements and beyond. The nearest PRoW to the Site is the Saxon Shore Way, a long distance footpath which traces the coast between Gravesend and Hastings. This route is also National Cycle Route 1 (NCN1). This can be accessed from Copperhouse Lane, Sharps Green or Riverside Country Park. In terms of local accessibility, the footbridge south of Lower Twydall Lane allows shortened walking distances towards facilities at Twydall.

Rainham Railway Station is approximately 3.3km south east of the Site at Station Road, and Gillingham Station is 3.7km west of the site. Southeastern operate regular services from both stations to Faversham (18mins), Dover Priory (45mins), Ramsgate (1hr 6mins), London Victoria (1hr 10mins), London St Pancras (1hr 24 mins) and Luton (2hrs 36mins) via destinations such as: Gravesend, Ebbsfleet International, Canterbury East, Dartford, Bromley South, Margate, Denmark Hill, London Bridge, Greenwich, Deal, Ashford International, St Albans City and Luton Airport.

Bus service enhancements will be explored as part of a future transport strategy for any application for the Site. These improvements would look to provide quick and convenient connections to key services such as schools, shops, employment areas and the nearby train stations. This would be one part of a wide reaching Travel Plan which would seek to prioritise walking and cycling opportunities and reduce the reliance on the private car.



Figure 9. Local Movement Analysis



HEAD OFFICE: Orchard House, Papple Close, Houlton, Rugby CV23 1EW
T: +44 [0]1788 726810 E: info@catesbyestates.co.uk W: www.catesbyestates.co.uk

SOUTH EAST OFFICE: Arena Business Centres, First Floor, The Square, Basing View, Basingstoke, RG21 4EB
T: +44 [0]1256 637914 E: info@catesbyestates.co.uk W: www.catesbyestates.co.uk

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Appendix B: A Proposal for a Sustainable New Neighbourhood

Rainham Road, Gillingham, Medway District, Kent – A Proposal for a Sustainable New Neighbourhood

Comment on Medway Local Plan Regulation 19 Consultation

August 2025

A Worton Rectory Park
Oxford
OX29 4SX
United Kingdom

T 

W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No. 09312403
17 Minster Precincts, Peterborough, PE1 1XX

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Version date: August 2025

Comment Final

This document has been prepared and checked in accordance with ISO 9001:2015.

7092

1.0 Introduction

This report has been prepared to support representations made by Catesby Strategic Land Limited (Catesby Estates) in relation to Medway District Council Regulation 19 Medway Local Plan consultation.

Catesby Estates are promoting land to the west of Pump Lane ('the Site') for a sustainable new community, and LDA Design have provided ongoing landscape and masterplanning expertise.

The purpose of this report is to provide commentary on the proposed allocation / Policy SA10 from a landscape, visual and design perspective; and broadly consider how available land within the broader Lower Rainham area could best accommodate new residential-led development.

2.0 The Site

The Site is located to the east of Gillingham, north-west of Rainham and north of Twydall.

The Site comprises four individual parcels of land, totalling approximately 30ha, separated by intervening roads and settlement.

The immediate context of the Site is characterised by small scale mixed farmland, with relatively intact hedgerows; paddocks; and dispersed settlement. Orchards are characteristic of the land immediately east of the Site, extending either side of Pump Lane.

The small hamlet of Lower Twydall - focussed on Lower Twydall Lane - lies between the two main areas of the Site. Predominantly residential development lies along the northern boundary of Site off the Lower Rainham Road (B2004) and there are areas of further residential development including at Grange Road and Eastcourt Lane in close proximity to the Site.

To the north of the Site / B2004 lies areas of mixed farmland; scattered residential development; and a boat yard, beyond which extend the intertidal marshes and mudflats fringing the River Medway. Land along the River Medway is forms part of the Riverside Country Park. The Medway Estuary and Marshes are designated as a Site of Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site.

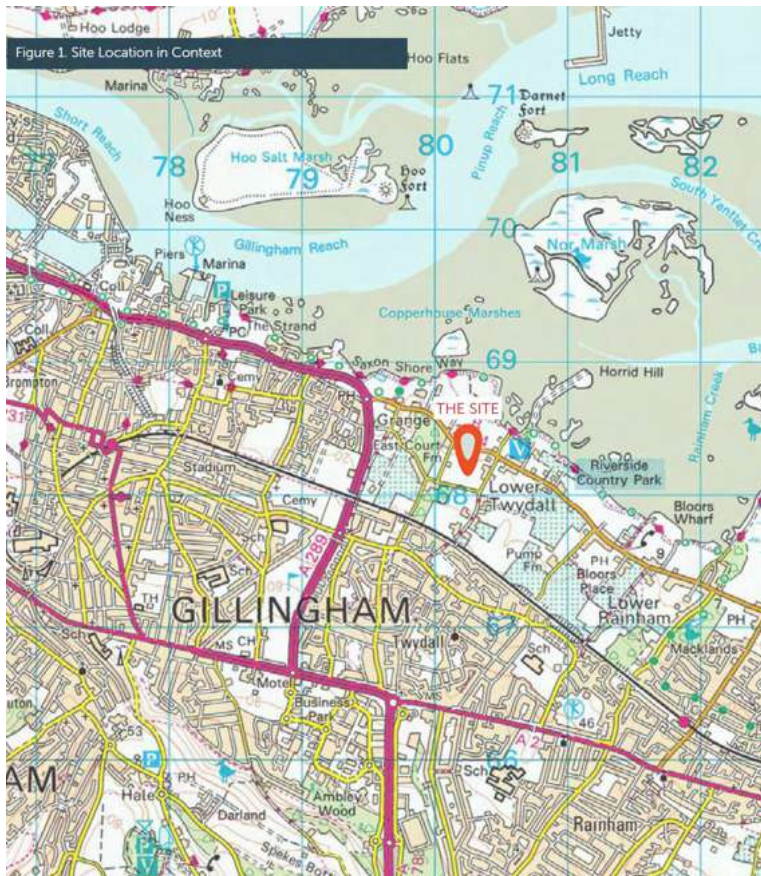
To the east of the Site, the orchards extend along Pump Lane and up to Lower Bloors Lane. A large part of this orchard area forms the site of the original Pump Lane planning application and is now proposed as housing allocation (Policy SA10)

To the south of the Site is the mainline railway linking London and Dover / Ramsgate, beyond which extends the urban area of Twydall.

To the west of the Site is the A209 and urban fringes of Gillingham.

The Site and the surrounding landscape are designated as the Gillingham Riverside Area of Local Landscape Importance (ALLI) under the adopted Local Plan. This is described as a rural landscape of orchards and arable fields with country lanes, and forming an important green buffer between built up areas and the Medway estuary.

Site location plans are provided below:



3.0 Site History

3.1. Pump Lane Planning Application

An Outline Planning Application (OPA) was originally submitted in 2019 for a residential led development of up to 1,250 homes at the Pump Lane site. This was refused by Medway District Council (MDC) for a number of reasons, including:

- Impact on the integrity of the Medway Estuary and Marshes SSSI, SPA and Ramsar site from increased recreational pressure.
- Impact on the local historic landscape, including the setting and significance of a number of designated heritage assets.
- Impact on the Gillingham Riverside ALLI.

The OPA was Appealed and was ultimately dismissed by the Secretary of State. The findings of the Inspector and Secretary of State were broadly similar, concluding that the landscape and heritage harm would not be outweighed by the benefits of the scheme.

3.2. Call for Sites

Catesby Estates have been progressing the vision and concept for the Site since 2019, informed by detailed landscape, visual and heritage advice. A Vision Document for the Site was submitted to MDC as part of their 'call for sites' in Summer 2020, and this included a 'Landscape, Visual and Heritage Appraisal'.

The Appraisal included details of the likely landscape, visual and heritage effects; proposed design and mitigation measures; and details of the emerging landscape-led masterplan concept. Overall, it was judged the proposed development could be sensitively integrated into the landscape and bring about benefits in terms of multifunctional green infrastructure.

3.3. Regulation 18 Local Plan

The Regulation 18 Local Plan was published / open for consultation in 2023, setting out potential options for growth. While the Regulation 18 Local Plan did not favour a particular growth strategy, 'suburban expansion' - including land to the north and east of Rainham - was identified as an option. Key issues identified included:

- These areas provide a contrast to the urban area and providing important green space (including the Riverside Country Park).
- These areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England.
- There areas contain key landscape links to the estuary in the north and the Kent Downs to the south.

A 'Landscape and Design Summary' was submitted – alongside an updated Vision Document – in Autumn 2023, highlighting the landscape-led approach to the proposed development.

3.4. Regulation 18b Local Plan

The Regulation 18b Local Plan was published / open for consultation in 2024, setting out the preferred options for growth. A 'blended regeneration' was proposed, comprising a mix of urban regeneration and development in suburban and rural areas, however, did not include the Site nor the Pump Lane site.

This included an updated Landscape Character Assessment (prepared by LUC) which established recommendations and guidance for any future development in relation to each Landscape Character Area.

Catesby Estates made representations in response to Regulation 18 Local Plan, and LDA Design reviewed the updated Landscape Character Assessment. In summary LDA Design concluded that the Landscape Character Assessment 'underplayed' the fragmented nature of the landscape; that the proposed development could adhere to the design guidance set out within the Landscape Character Assessment; and that the broader Rainham Road areas presents an opportunity to create a new 'neighbourhood' that works within the existing landscape framework.

3.5. Regulation 19 Local Plan

The Regulation 19 Local Plan was published / open for consultation in 2025, setting out specific allocations for development. The Site is not a proposed allocation with the Regulation 19 Local Plan, however, the Pump Lane site is allocated for up to 750 houses. The Pump Lane site is referred to as 'Rainham Village' and forms part of Policy SA10.

There are no known published evidence base document(s) which outline why the Pump Lane site is allocated despite not being identified as part of the Regulation 18b Local Plan, and having previously been refused for development by MDC; the Planning Inspectorate; and the Secretary of State.

The preamble to Policy SA10 notes the landscape sensitivities of this area and need for development to respond to the rural character of the area. It also highlights the benefits of a larger scale, plan-led scheme (as opposed to multiple smaller ad hoc developments); and the ability of future development to provide a green backdrop to the Riverside Country Park and with improved connections for people and nature.

The preamble also notes that the Rainham Village development will be entirely different to the scheme that was dismissed at appeal in 2021. This is achieved – in part – through fewer homes and the subdivision of the site into smaller parcels. The concept plan for the Lower Rainham allocation is included below:



Figure 15: Lower Rainham Concept Plan

4.0 Landscape Character Assessment

In providing commentary on landscape, visual and design matters, it is important to understand the prevailing landscape character context.

The Site; Pump Lane site; and the broader Lower Rainham area are located within Landscape Character Area (LCA) E1: Lower Rainham Farmland as defined by the Landscape Character Assessment 2024.

Key characteristics are:

- *“A low-lying, flat to gently undulating landform that rises gradually away from the adjacent marshes to the north.*
- *High quality soils support a variety of agricultural and horticultural land uses, including several orchards and arable farming, but also some pasture; it forms a small part of the distinctive area of ‘Fruit Belt’ landscape stretching east towards Faversham, strongly identifiable with the ‘Garden of England’.*
- *Small to medium scale field pattern defined predominantly by shelter belts and high hedges; some replacement with coniferous planting in places.*
- *A network of roads, narrow lanes, and tracks, which largely follow a north-south axis, running down towards the adjacent marshes; these intersect with east-west oriented Lower Rainham Road and the Chatham Main Line railway, resulting in a rectilinear pattern/grain.*
- *Settlement comprises scattered farmsteads and residential properties, with more concentrated settlement within the hamlets of Lower Rainham and Lower Twydall; to the east there is ribbon development along Lower Rainham Road, Berengrave Lane and Station Road.*
- *An over-riding rural character with open farmland and orchards interspersed with farm buildings and cottages, several of which are listed, and Conservation Area designations covering the historic parts of Lower Rainham and Lower Twydall; the rural character is undermined to the east and west due to urban fringe influences and a predominance of equine uses.*
- *A sense of enclosure as a result of the landform and shelter belts/hedges around orchards and along narrow lanes; views across the area are generally limited, albeit with some open views north towards the Medway Estuary around larger arable fields and/or where hedgerow loss has occurred (particularly in western areas between Lower Twydall and Ladds Corner).*
- *Two PRoW cross the area, and the narrow lanes and tracks are also well used by pedestrians, providing access to the landscape; the railway line and the A289 cause some severance and weaken links to/from the urban area to the south and west.”*

Landscape Management Guidance includes:

- *“Encourage the traditional farming practice and maintain and restore traditional orchards, retaining and enhancing the area’s strong sense of place and associations of the Kent Fruit Belt; seek to connect and extend and manage to enhance biodiversity value.*
- *Conserve the traditional pattern and structure of the landscape by improving the continuity of hedgerows/shelter belts to enhance the rectilinear field pattern and to create an intact and connected network providing shelter from higher winds and shade; enhance and augment*

fragmented field boundaries with locally characteristic species, filling gaps where possible and replacing uncharacteristic coniferous planting and fencing.

- *Improve connectivity and recreational use across the area and between it and the adjacent areas, including the urban area and the marshes and Saxon Shore Way to the north; consider the introduction of new formal PRow between Lower Twydall and the Saxon Shore Way.*
- *Consider opportunities to increase the extent of deciduous woodland cover, using locally characteristic species to strengthen biodiversity and local distinctiveness, particularly around the urban area and other sub urbanising influences, using locally occurring species.*
- *Involve local communities in the management of orchards, particularly those connected to existing/new development, promoting local engagement and understanding."*

Development Management Guidance includes:

- *"Conserve the local distinctiveness of historic buildings and hamlets and their rural setting, including Lower Rainham and Lower Twydall, by resisting inappropriate or unsympathetic development.*
- *Consider the role of this area as a green backdrop to the adjacent marshes, by resisting visually prominent development.*
- *Utilise existing roads and tracks for site access wherever possible; for any new roads and tracks, consider how these can fit in with the landscape character and complement the pattern of the existing roads.*
- *Integrate new development, through the use of native shelter belts, hedgerows and woodlands.*
- *Avoid large scale urban/housing extensions within this working rural agricultural landscape characterised by its low-density dispersed settlement pattern.*
- *Avoid linear coalescence of development along roads, maintaining distinctive settlement identity, particularly between the hamlet of Lower Rainham and the urban area of Rainham to the east.*
- *Conserve the rural character in central areas and consider the rural setting of Lower Rainham and Lower Twydall, scattered listed farm buildings and Riverside Country Park."*

The overall Landscape Strategy for the Lower Rainham Farmland is to conserve and enhance the rural character of this intensively farmed area, including the setting of rural Conservation Areas at Lower Rainham and Lower Twydall; provide better functional connections for people and nature with the adjacent marshes; and strengthen the rectilinear pattern/grain of the landscape through reinforcing hedgerow / shelter belt boundaries.

5.0 Landscape Commentary

5.1. Overview

LDA Design broadly agree with the Landscape Character Assessment's description of key characteristics and guidance for landscape and development management. It is acknowledged that any new development within the Lower Rainham Farmland has the potential to impact on the dispersed settlement pattern and rural character of the landscape – including the potential loss of characteristic orchards - and needs to be carefully considered to successfully integrate development into the prevailing landscape context.

However, it is considered that the Landscape Character Assessment 'underplays' the fragmented nature of the landscape, comprising a mix of arable land, orchards, grazing, and neglected parcels of land and overall poor condition of some areas. This was highlighted by the earlier Medway Landscape Character Assessment (2011) and verified through independent desk and field study.

The representations submitted in relation to the Regulation 18b Local Plan clearly sets out how a 'landscape-led' masterplan could be created, namely through a scale and extent of development that reflects the dispersed settlement pattern; and a comprehensive landscape strategy also would protect the role of the landscape as a 'green buffer' separating the built-up areas of Twydall and Rainham from the Medway Estuary – albeit one that is already characterised by clusters of built development.

5.2. Rainham Village

As outlined in Section 3.0, there is no clear evidence that justifies the allocation of the Pump Lane site / Rainham Village over the Site. Both areas are similar in character and context, forming part of the rural landscape of orchards and arable fields between built up areas and the Medway estuary. However, while similar in overall character and context, the Rainham Village site is arguably more sensitive in landscape terms by virtue being predominately orchards. These are a key characteristic of LCA E1: Lower Rainham Farmland and virtually all orchard areas would be lost as a result of proposed allocation.

It is also considered that the concept plan also does not illustrate a particularly sensitive design response:

- Although there are various, smaller scale development parcels, the layout and distribution of development appears to be relatively dense and does not represent a fragmented or dispersed settlement pattern.
- The development would directly adjoin Lower Rainham to the north and extends up to the railway line to the south, resulting in a degree of coalescence.
- A secondary school is proposed the south, and appears to effectively link – in combination with the residential parcels - Lower Rainham in the east and Lower Twydall in west. It is also located at the highest point of the site, where is likely to be most visually prominent.

- The layout and distribution of development appears to be driven by available land and does not establish a strong or legible landscape framework, with relatively limited green infrastructure and space for new planting.
- Due to the issues regarding layout and green infrastructure, it does not provide particularly strong connectivity between the existing urban area and Riverside Country Park.

As such, it is considered that the concept plan is not 'landscape-led' and does not meet some of the key guidance set out within the Landscape Character Assessment.

However, it is judged that the broader Rainham Road area presents an opportunity to create a new 'neighbourhood' that more closely adheres to the Landscape Character Assessment's guidance, working within the existing landscape framework and provides landscape enhancement; open space provision; and new recreational routes. This can be achieved through a series of smaller development clusters set within the network of existing / proposed fields, orchards and lanes.

While there would inevitably be some landscape and visual impact, as MDC have already judged in relation to the Rainham Village, this harm – subject to sensitive design – could be outweighed by the benefits of new housing and community infrastructure.

This would also ensure a comprehensive, landscape-led plan for the wider Lower Rainham area and avoid pressure for any further speculative development beyond the allocated area. This is the approach already advocated by MDC in relation to Policy SA10 (which highlights the benefits of a larger scale, plan-led scheme); enables any landscape (and other environmental) impacts to be appropriately mitigated; and maximises the opportunity for environmental gain and enhancement.

5.3. Designing a New Community

Based on our understanding of the landscape / settlement and broader environmental context, the following recommendations are made in relation to a more comprehensive, landscape led scheme:

- Appropriate scale and extent of development that reflects the dispersed settlement pattern
- Development parcels distributed throughout the area and intervening land retained and enhance as green infrastructure.
- Development pattern to follow the broadly north-south orientation of lanes and fields, along with 'breaks' east-west to limit the sense of coalescence with the adjoining urban areas.
- This could include the creation of a new 'park' on higher ground to the south, which would act as buffer to the railway / urban area; contribute to the setting of Lower Twydall; and provide an alternative destination to the Country Park.
- Layout and design of individual clusters that reflects the character of the local villages rather than adjacent urban areas.

- Retention and enhancement of boundary vegetation to retain existing landscape structure and integrate the development into the landscape.
- New planting within the development clusters to create an attractive setting; further help integrate new buildings into the landscape; and reinforce the role of the landscape as a green backdrop to the Medway Estuary.
- Appropriate offsets to surrounding Conservation Areas comprising green spaces and retained / new characteristic orchards.
- Creation of an extensive, well connected, and multi-functional network of public open spaces and areas for wildlife, including connections to the Riverside Country Park.
- New spaces and routes could alleviate existing visitor pressure of the Riverside Country Park, and – through better pedestrian and cycle connectivity – minimising the need to access the County Park via car.
- Areas of public open space and routes to include appropriate signage, including interpretation of any important landscape and heritage features.
- Proactive management and maintenance of public open spaces and landscape features such as hedgerows and community orchards to maintain the long-term amenity and biodiversity interest.

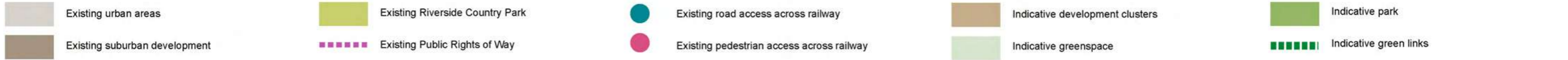
The diagrams below illustrate the existing context; the proposed Rainham Village concept; and a potential landscape-led concept for more comprehensive growth in this location.



Figure 1: Existing context and Lower Rainham concept plan



Figure 2: Indicative landscape-led development concept



6.0 Conclusion

Overall it is considered that the Site represents an equally appropriate development opportunity to that of Rainham Village and would avoid the loss of characteristic orchards.

The proposed concept for Rainham Village indicates a relatively dense form of development that is not 'landscape-led' and does not meet some of the key guidance set out within the Landscape Character Assessment.

However, it is judged that the broader Rainham Road area presents an opportunity to create a new 'neighbourhood' that more closely adheres to the Landscape Character Assessment's guidance; enables any landscape (and other environmental) impacts to be appropriately mitigated; and maximises the opportunity for environmental gain and enhancement. This can be achieved through a series of smaller development clusters set within the network of existing fields and orchards new green infrastructure.

Catesby Estates and LDA Design would welcome the opportunity to work closely with MDC (and other stakeholders) to further develop the proposals for the Site.

Appendix C: Housing Land Supply Technical Paper

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Appendices:

Appendix 1	Assessment of Council's draft housing allocations (Tables A and B) (July 2025)
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Appendix 4	Trajectory 3 – Neame Sutton position on supply and requirement with application of a 20% buffer

1.0 Instructions and Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Catesby Strategic Land Limited ('Catesby') to prepare a Technical Report address the matters of Housing Need and Land Supply in relation to the Regulation 19 consultation version of the Medway Local Plan 2041.
- 1.2 This report sets out the findings of a review of the Council's stated housing need and the consequent housing requirement set out in the emerging Local Plan along with an analysis of its stated land supply sources in order to test the Soundness and Legal Compliance of the Regulation 19 draft Plan.
- 1.3 This report therefore deals with the following matters:

Table 1: Summary of Matters Covered by This Report

Matters Covered	Section
Consideration of the Housing Need and components of the Housing Requirement	Section 2
Review of Housing Land Supply sources and trajectory	Section 3
Identification of the changes required for Soundness/Legal Compliance	Section 4

- 1.4 As an introduction to this matter, the importance of significantly boosting the supply of housing nationally is a core manifesto pledge of the Labour Government and sits at the heart of its plans for reform of the planning system and for economic recovery and prosperity as a whole.
- 1.5 The new National Planning Policy Framework published in December 2024 ("the Framework 2024") sets out Government policy on exactly how local authorities and applicants are expected to bring about the deliver of a minimum of 1.5 million new homes during the current parliamentary term.
- 1.6 The Development Plan system is a core component of this delivery objective and it is therefore vital that local planning authorities plan positively and ambitiously in order to ensure that the minimum Local Housing Need "LHN") is provided for. Of equal importance is ensuring that the supply of new homes to meet the need is deliverable and developable and that adequate contingencies are in place to cover circumstances where delivery falls below expectation ensuring the Development Plan is flexible and can accommodate changes in circumstances throughout its life.

- 1.7 It is with this background context in mind that Neame Sutton has undertaken a review of the Council's proposed position in the Regulation 19 draft of the Plan.

2.0 Housing Need and Requirement

(i) Key Policy Context for Housing Requirement

- 2.1 The Framework 2024 sets out the key policy context in respect of Plan-making. Paragraph 22 confirms that strategic policies (which includes policies in relation to housing need and delivery) should look ahead over a minimum 15 year period from adoption.
- 2.2 Paragraph 62 confirms that the determination of the minimum number of homes needed should be informed by a local housing need assessment conducted using the standard method in the National Planning Practice Guidance “PPG”). In addition to the LHN any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 2.3 The Framework 2024 goes on to state that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement figure may be higher than the identified LHN¹.
- 2.4 The PPG confirms that the standard method calculation of LHN identifies the minimum number of homes expected to be planned for. This is the starting point. The LHN is not the housing requirement figure².
- 2.5 The housing requirement figure is the minimum number of homes that the plan seeks to provide during the Plan period. The PPG goes on to explain that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. By definition, growth is to plan for more homes than the minimum number or LHN³.
- 2.6 The PPG confirms that where authorities plan for higher growth this should not normally have to be thoroughly justified at examination⁴.

¹ Paragraph 69 on Page 18 – Framework 2024.

² Paragraph 002 Reference ID: 2a-002-20241212 Revision Date: 12 12 2024 – Housing and Employment Needs section of the PPG

³ Paragraph 040 Reference ID: 2a-040-20241212 Revision Date: 12 12 2024 – Housing and Employment Needs section of the PPG

⁴ Paragraph 040 Reference ID: 2a-040-20241212 Revision Date: 12 12 2024 – Housing and Employment Needs section of the PPG

2.7 It is therefore clear that the Government expects authorities to be ambitious and that the Examination process will be more supportive of those authorities that are ambitious.

(ii) The Starting Point – Standard Method 2025

2.8 Turning now to consider the calculation of the Council's housing need and housing requirement for the emerging Plan.

2.9 As required by the Framework 2024 the starting point for the calculation of the minimum housing requirement is the calculation of LHN by reference to the Standard Method⁵.

2.10 Whilst the draft Plan is unclear on what the Plan period is that the Council is intending to cover the Land Availability Assessment ("LAA") (June 2025) confirms the starting year as 2026/27 and that a 15 year period will be planned for up to 2041.

2.11 The Regulation 19 draft is also dated June 2025 and therefore the calculation of LHN will need to use 2025 as the base year. This may need to be updated in due course to 2026 depending on the point at which the Plan is submitted for examination⁶.

2.12 Taking the above into account the current Standard Method calculation of LHN for Medway as at May 2025 equates to **1,636 dpa**.

2.13 The draft Plan does not contain a housing delivery policy or a spatial distribution policy, which in both instances is unusual. The supporting text at Paragraph 1.3.5 on Page 13 confirms that the Council is applying the Standard Method figure of 1,636 dpa over a 15 year period, which equates to a total LHN of 24,540 dwellings.

2.14 This is however contradicted by the Medway Local Housing Needs Assessment report (February 2025) that states the LHN figure to be applied is 1,594 dpa.

2.15 In any event Catesby considers that the correct LHN figure as a starting point for the calculation of the minimum housing requirement is **1,636 dpa**, which leads to a total LHN of **24,540 dwellings**.

⁵ As set out in the Housing and Economic Needs section of the PPG from Paragraph 004 onwards.

⁶ Paragraphs 008 and 009 Reference ID: 2a-008-20241212 and 2a-009-20241212 Revision date: 12 12 2024 – Housing and Economic Needs section of the PPG

(iii) Consideration of Factors that Indicate Need for an Uplift

- 2.16 As the PPG confirms the LHN is only the starting point and local authorities should look to plan ambitiously for the future having regard to any relevant factors that may indicate a need for an uplift.
- 2.17 Such factors can include the need for affordable housing, economic growth strategies and aspirations, infrastructure delivery and, other affordability factors. The PPG positively encourages local authorities to consider the merits of planning for higher growth as part of the process of determining the minimum housing requirement for the Plan period⁷.
- 2.18 The position taken by Government in the Framework 2024 and PPG marks a clear shift from the previous Government that identified the concept of increasing the housing requirement above the LHN as more of an exception to the norm rather than encouraging local authorities to explore it.
- 2.19 The Council has not sought to explore the case for an uplift beyond the LHN at all in its evidence base. The Local Housing Needs Assessment report does not contemplate the need for an uplift and merely explores whether the LHN is appropriate to apply in itself. It is clear that the Council has not even explored this matter and instead relies on the LHN as the basis for its housing requirement.
- 2.20 The Sustainability Appraisal confirms this is the position on the basis that only two growth options have been considered:
- Option 1 – Meeting the LHN
 - Option 2 – Meeting the LHN plus Gravesham's unmet need (explored in sub-section (iv) below)
- 2.21 The Council's approach has therefore failed to grapple with the requirements of the Framework 2024 and the PPG.
- 2.22 It is particularly concerning that the Council has not contemplated a higher level of growth given the significant infrastructure requirements identified in the Infrastructure Delivery Plan ("IDP") (June 2025) that rely upon S106 and/or unknown/to be confirmed funding sources. There is clearly a significant level of strategic infrastructure for which the Council has no firm approach for delivery.

⁷ Paragraph 040 Reference ID: 2a-040-20241212 Revision Date: 12 12 2024 – Housing and Economic Needs section of PPG

- 2.23 Catesby therefore considers that the Council should, at the very least, test a higher level of housing requirement that could support the necessary strategic infrastructure identified in the IDP.

(iv) Unmet Need from Neighbouring Authorities

- 2.24 It is clear that unmet need arises from neighbouring authorities to Medway. Gravesham Borough Council in particular has been clear that it has unmet need and it continues to request that Medway assists it. The level of unmet need has been quantified by Gravesham at 2,000 dwellings.
- 2.25 The positions in relation to Swale and Tonbridge and Malling do not appear to have been explored by the Council through the Duty to Cooperate ("DtC"). The DtC Statement confirms that both authorities are at an early stage of plan making and that because no requests have been made to accommodate unmet need the matter is effectively closed. As Catesby sets out in its separate representations on DtC the approach taken by the Council is incorrect and does not reflect the requirements of the Framework 2024 or the relevant legislation.
- 2.26 In the case of Swale it is clear from the report presented to its Planning and Transportation Policy Working Group on 15 July 2025 that it is progressing with the necessary background work to inform the preparation of a new Plan and therefore DtC discussions must form part of that process. Medway has failed to continue its dialogue with Swale.
- 2.27 It is also clear that Tonbridge and Malling is working on the background evidence necessary to inform the preparation of a new Plan. DtC discussions must form part of that process and therefore Medway has also failed to continue its dialogue with Tonbridge and Malling.
- 2.28 The reason the position with Swale and Tonbridge and Malling is important is that Medway simply does not know whether a) there is any unmet need arising and b) what quantum of unmet need there might be.
- 2.29 What is apparent from historic evidence in relation to Tonbridge and Malling, as an example, is that its 2022 Housing Needs Assessment confirmed a need (at that time) of 839 dpa compared with a delivery of 591 dpa resulting in a deficit -248 dpa. That

would indicate that Tonbridge and Malling may have had difficulty (at that time) in meeting all of their own needs⁸.

- 2.30 Swale has also commissioned a report by AECOM to look at whether a case exists to progress a housing requirement below the LHN⁹. Whilst the report concluded that Swale did not have a case to pursue a housing requirement below the LHN, it has confirmed that due to the constraints present in the local authority area lower growth scenarios are reasonable providing that unmet need is provided for¹⁰.
- 2.31 Unmet need arising from these two authorities is therefore more likely than not and the Council has failed to grapple with it.
- 2.32 In addition to those local authorities that directly neighbour Medway there is potential for unmet need arising both from London and also Thurrock (to the north of the River Thames). The former arises from the direct functional connections between Medway and the capital via road and rail. The latter arises from the proposed Lower Thames Crossing that would directly link the two authority areas under the River Thames. The Government granted consent for the DCO on 25 March 2025 and work is due to commence in 2026 with a projected completion in the early 2030s i.e. well within the Plan period.
- 2.33 No consideration of unmet need arising from these locations has been given by the Council.

(v) The Minimum Housing Requirement

- 2.34 The starting point of an LHN equating to 1,636 dpa is established and the Council has correctly calculated this.
- 2.35 What the Council has failed to do is give any proper consideration to the factors that would indicate the need for an uplift to the LHN. Nor has the Council properly addressed the matter of unmet need via the DtC.
- 2.36 It is clear from the evidence in this Statement that there is a strong case for an uplift to the LHN for the emerging Plan period. The extent of the uplift should cater for the

⁸ Paragraph 6.4 on Page 110 – Housing Needs Survey Tonbridge and Malling Borough Council (July 2022) - <https://www.tmbc.gov.uk/downloads/file/2187/housing-needs-report-2022>

⁹ Housing Targets Exceptional Circumstances Study – September 2024 - https://swale.gov.uk/_data/assets/pdf_file/0009/484794/Housing_Targets_Exceptional_Circumstances_Study_2024.pdf

¹⁰ Paragraphs 6.1.9 – 6.1.11 on Page 64 of Housing Targets Exceptional Circumstances Study – September 2024 - https://swale.gov.uk/_data/assets/pdf_file/0009/484794/Housing_Targets_Exceptional_Circumstances_Study_2024.pdf

known shortfall of 2,000 dwellings arising from Gravesham. It is probable that once the Council has engaged with the DtC correctly that further unmet can be quantified arising from Tonbridge and Malling and Swale. At the very least looking at the available evidence there is a case for increasing the minimum housing requirement by a further 2,000 dwellings to cater for some of the previously known unmet need arising from Tonbridge and Malling and the likelihood that Swale will also be unable to meet its full need.

- 2.37 At the present time, given the deficiencies in the Council's approach to the DtC and the matter of unmet need Catesby considers that the minimum housing need figure for the Plan should comprise:

Table 2 – Catesby's Position on the Minimum Housing Requirement

Components of Need (2026-2041)	Dwellings	Dpa
Local Housing Need (LHN)	24,540	1,636
Minimum Adjustment for Unmet Need and other factors such as infrastructure delivery	4,000	267
TOTAL Minimum Housing Requirement (2026-2041)	28,540	1,903

- 2.38 As confirmed earlier in this Statement the Council's SA has tested an additional 2,000 dwellings designed to meet Gravesham's unmet need alone. No further growth scenario has been tested in the SA on the basis of the Council's flawed DtC approach i.e. that there has been no formal confirmation on the existence or extent of unmet need arising from any other neighbouring authority¹¹.
- 2.39 This is a fundamental failure of the SA process undertaken by the Council that ignores the evidence available in relation to unmet need and other factors such as the provision of strategic infrastructure as set out in the IDP.
- 2.40 The remainder of this Statement explores the housing supply and delivery trajectory set out by the Council in terms of the proposed Plan requirement and also the increased requirement set out in Table 2 above.

¹¹ Paragraph 5.3.12 on Page 27 of the SA (June 2025)

3.0 Housing Supply and Trajectory

(i) Key Policy Context Housing Supply

General Policy in Relation to Supply and Trajectory:

3.1 In relation to housing supply and trajectory matters the Framework 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. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old...'¹²

Application of a Buffer:

3.2 In addition to the above the assessment of supply must include an appropriate buffer by reference to the latest Housing Delivery Test ("HDT") result.

3.3 In circumstances where delivery falls below 75% of the requirement over the past three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of the Framework 2024, in addition to the requirements for an action plan and 20% buffer.

3.4 The latest HDT result (the 2023 HDT) was published on 12 December 2024 and for Medway equates to 72%. The presumption in favour of sustainable development therefore applies as does the 20% buffer.

3.5 The Council's poor performance in relation to delivery as set out in the 2023 HDT result is not an isolated position. The table below summarises the HDT results from the past 5 years for Medway and confirms a history of poor delivery.

Table 3: HDT Results for Medway

HDT Year	HDT Result
2019	46%
2020	55%
2021	67%
2022	79%
2023	72%

¹² Paragraph 78 of the Framework 2024

- 3.6 In all but one year the HDT result has been low enough to engage the presumption (where this was applicable). However, the need for a 20% buffer has applied to every year.
- 3.7 It is therefore clear that the Council's assessment of supply and trajectory for the new Plan should include a 20% buffer to address the long standing history of poor delivery.
- 3.8 In the context of the emerging Plan a 20% buffer would equate to an additional **4,908 dwellings** (based on the Council's proposed housing requirement, or an additional **5,708 dwellings** applying the requirement set out in Table 2 above.

Evidence Requirements for Supply Sources:

- 3.9 When looking at sources of supply, Annex 2 of the Framework 2024 sets out the definitions of deliverable and developable as follows:

'Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

'Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'

- 3.10 If a local authority is to make an allowance for windfall sites Paragraph 75 of the Framework 2024 sets out a separate test of compelling evidence that is to be passed, stating:

'Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.'

- 3.11 The Framework 2024 is supplemented by the Housing Supply and Delivery section of the PPG that provides further examples of the types of evidence that can be relied upon by the authority for the inclusion of Category B sites in particular¹³. Advice is

¹³ Paragraph 007 Reference ID: 68-007-20190722 Revision date: 22 07 2019

also provided in relation to the evidence required to demonstrate that a site is developable¹⁴.

- 3.12 The matter of deliverable and developable supply has also been the subject of many Planning Appeals and case law, which for expediency is not repeated in this Statement.

(ii) Consideration of the Components of Supply

- 3.13 Turning now to consider the components of supply relied upon by the Council in its housing delivery trajectory for the emerging Plan.
- 3.14 The Regulation 19 consultation draft of the Plan contains little or no information on housing delivery and unusually does not even have a policy setting out the housing requirement and how it is to be delivered, which is a direct conflict with the Framework 2024¹⁵.
- 3.15 The Council instead relies upon its Land Availability Assessment (June 2025) to set out its delivery trajectory and justification for the inclusion of sites and a windfall allowance.
- 3.16 The supply sources relied upon by the Council for the proposed Plan period 2026 – 2041 comprise:

Table 4 – Summary of Council's Supply Sources

Supply Sources	Category
Windfalls	B
Large Sites under construction as at March 2024 to be delivered during the plan period	A
Large Sites permitted but not allocated	B
Small Sites permitted (less 15% lapse rate)	A
Draft Local Plan Allocations	B

- 3.17 The focus of this section of the Statement is on those supply sources falling within Category B where the obligation is on the Council to demonstrate that they are deliverable (in years 1 – 5) or developable (in years 6 – 15).

Windfalls:

- 3.18 The evidence relied upon by the Council for inclusion of a windfall allowance in the trajectory is contained in Section 3 of the LAA.

¹⁴ Paragraphs 010 – 011 Reference ID: 68-010-20190722 and 68-011-20190722 Revision date: 22 07 2019

¹⁵ Paragraphs 20, 22 and 78 in particular.

- 3.19 The evidence is limited and only looks at past delivery trends for large and small site completions dating back 2014. No consideration is given to expected forward trends, which is a requirement of Paragraph 75 of the Framework. The compelling evidence test is a necessarily high bar to meet and the Council's limited analysis does not.
- 3.20 In particular the Council has not considered any of the following. Firstly the Council's assessment, which only looks backwards, is not reflective of current policy and the current economic conditions. Secondly, the assessment looks at a period where, primarily, the first iteration of the Framework 2012 was in place and also the world had not been impacted by the COVID-19 pandemic and subsequent economic downturn.
- 3.21 Thirdly, no consideration has been given to future trends or circumstances such as:
- The planning system is experiencing a period of extreme change and uncertainty. Speculative applications on unidentified sites at a time when the planning system is experiencing change may well be viewed by some small to medium sized developers as too high risk;
 - The economic climate in the UK has entered a period of uncertainty, with interest rates reaching the highest levels in almost 15 years recently;
 - In November 2022 UK inflation hit 10.7%. Whilst the latest figure for July 2025 is 4.1% showing a marked improvement this is still substantially above the position in 2021, which was less than 1%;
 - As a consequence of the substantial increase in inflation the Bank of England had increased the base rate to its highest level for 15 years 5.25%. This is now at 4.25%. This compares with a rate of 0.1% in 2021;
 - The significant increase in the base rate has of course led to a historic high in borrowing costs with mortgages and other forms of debt increasing exponentially;
 - The current uncertainty is highly likely to lead to a slow-down in the market and housing delivery, which will affect the small to medium sized builders first. In fact the latest statistical release from Homes England (26 June 2025) confirms that overall housing starts are down by 4.6% when compared with the same period for the previous year¹⁶;

¹⁶ Table 1a on Page 7 of Housing Statistics – 01 April 2024 – 31 March 2025 (published 26 June 2025) - https://assets.publishing.service.gov.uk/media/685bde09c07c71e5a87097f7/Housing_Statistics_June_2025.pdf

- Whilst there has been a marked improvement in the inflation position interest rates on loans have not improved and the period of uncertainty is unlikely to change in the short term due to the impending changes to the planning system;
- It is acknowledged that the new Framework 2024 has boosted confidence and will in time lead to increased delivery, but that cannot be relied upon immediately by the Council; and,
- This is particularly the case where the Council is seeking to focus on previously developed land first before greenfield sites and, as a consequence many of the potential windfall sites will have been identified as draft allocations.

3.22 None of the above factors have been considered by the Council because, put simply, the Council has not presented any evidence of future trends in windfall delivery across the District. It cannot therefore be said that the data set out at is a reliable basis for predictions of windfall delivery going forward.

3.23 It is for all of these reasons that the windfall allowance within the Plan should be reduced and removed from the first five years of the Plan period. Whilst it is arguable that the windfall allowance should be removed altogether on the basis that the compelling evidence test has not been met Neame Sutton considers a more pragmatic approach is to discount the windfall allowance by 15% (similar to the Council's approach to its small sites). With that in mind the windfall allowance is reduced as follows:

Table 5 – Reduction to Council's Windfall Allowance

Council's Position	Neame Sutton Position	Difference
1584	1120	-464

Draft Allocations:

3.24 The Council's evidence in support of the delivery estimates made for the draft allocations is contained in Appendix B and Appendix G of the LAA. The former sets out the answers provided by all site promoters along with other evidence held by the Council in relation to each site, whilst Appendix G sets out a delivery trajectory for each of the proposed allocations. No other evidence such as that set out in the PPG has been published or is relied upon by the Council.

3.25 In this respect, the Council's evidence base particularly for those draft allocations that it considered will deliver completions in years 1-5 of the Plan period is limited and in the majority of cases goes nowhere near to meeting the clear evidence test.

- 3.26 For these reasons the analysis undertaken by Neame Sutton has focussed on the larger site allocations falling within Category B. It is important to highlight that the majority of the smaller Category B site allocations also fail the relevant evidential tests and would therefore also fall out of the early years in the trajectory. Given the sheer number of site allocations that fail the evidence test it was not considered expedient to set them all out in this Statement. The Council should however revisit all of the Category B site allocations.
- 3.27 As a starting point it is relevant to note that the Council has not actually categorised its allocations according to whether they fall within Category A or B. This work has been undertaken by Neame Sutton and is set out in Tables A and B in **Appendix 1** of this Statement.
- 3.28 It is also relevant to note that as well as Category B sites failing to meet the evidential burden for inclusion in years 1-5 in a number of instances the Council's evidence actually contradicts the delivery trajectory relied upon i.e. site promoters have said that deliver will take place considerably later in the Plan period than the Council has.
- 3.29 Table B in **Appendix 1** contains a column that summarises Neame Sutton's assessment of the highlighted Category B sites and the reasons why the delivery trajectory relied upon by the Council is unrealistic and fails the Annex 2 test.
- 3.30 The impact of Neame Sutton's analysis of the Council's draft allocations is summarised in the table below:

Table 6 – Reduction in Council's Supply from Draft Allocations over the Plan period

Council's Position	Neame Sutton Position	Difference
21,397	18,631	-2,766

(iii) Neame Sutton Assessment of Supply and Trajectory

Overall Housing Supply for the Proposed Plan Period:

- 3.31 The table below summarises the total impact of Neame Sutton's analysis on the Council's projected supply over the Plan period:

Table 7 – Impact of Neame Sutton Analysis on Council's Supply

Supply Source 2026 - 2041	Council's Position	Neame Sutton Position	Difference
Large Sites Under Construction as at March 2024	1524	1524	0
Large Sites Permitted but not Allocated	128	128	0
Small Sites Permitted with 15% Lapse Rate Applied	111	111	0
Windfall Allowance	1584	1120	-464
Proposed Housing Allocations	21397	18631	-2766
TOTAL Supply	24743	21513	-3230

- 3.32 It is evident that the Council's position is over optimistic and when the Annex 2 definition is correctly applied along with the compelling evidence test at Paragraph 75 the true supply position is some **-3,230 dwellings** lower than the Council has identified.
- 3.33 Even if the Council's position is correct it generates a nominal surplus of only **203 dwellings**, which is less than 1% of the total minimum housing requirement set out in the draft Plan. In other words nearly 100% of the Council's supply sources MUST deliver the exact number of dwellings anticipated at the time expected in the trajectory for the Council merely to break even on meeting its minimum LHN (that is before consideration of the evidence in Section 2 of this Statement is taken into account).
- 3.34 That is not a Sound housing delivery trajectory, particularly in circumstances where the Council has a proven track record of poor delivery leading to the engagement of the presumption in favour of sustainable development and the application of a 20% buffer. At the very least the Council MUST include a 20% buffer within its supply to ensure that it does not continue the record of poor under delivery.
- 3.35 When Neame Sutton's assessment of the Council's supply position is taken into account the nominal surplus changes to a large shortfall of at least **-3,027 dwellings (-12%)** against the minimum LHN. That position is materially worse when the minimum housing requirement set out in Table 2 of this Statement is applied to the Council's trajectory with a massive shortfall of at least **-7,032 dwellings (-25%)**.

- 3.36 It is therefore clear that the Council has failed to identify sufficient housing to meet even the minimum LHN with an appropriate buffer applied and its supply goes nowhere near to meeting the correct minimum housing requirement with a massive 25% shortfall.

The Housing Land Supply Position:

- 3.37 The Council has not provided evidence to demonstrate compliance with the requirement to show a 5-year supply of deliverable housing sites at the point of adoption and for every year thereafter.
- 3.38 Neame Sutton has undertaken this assessment (see the trajectories contained in **Appendices 2 - 4**), which confirms that when the Council's minimum LHN is applied to its stated supply there would appear to be a modest 5-year supply position for years 1-9 of the Plan period. Thereafter, even on the Council's figures, the supply falls into a negative position.
- 3.39 However, when the correct application of the Annex definition and Paragraph 75 is applied to the Council's stated supply it is clear that the Council will be unable to demonstrate a 5-year supply of deliverable housing sites at any point throughout the Plan period (see Trajectory 2 in **Appendix 3**). In fact the Council's supply would peak at only 3.9 years in 2031/32, which is poor.
- 3.40 The position when the correct housing requirement is applied is materially worse as Trajectory 3 in **Appendix 4** demonstrates.
- 3.41 The position set out in Trajectory 2 is clearly a more accurate reflection of the Council's rolling deliverable housing land supply and is reflective of the Council's own stated position at the present time i.e. as at 31 March 2024, which equates to only 3.1 years.
- 3.42 The Council has failed to be ambitious as required by Government, which is a significant concern particularly given the number of years where its HDT result has triggered the automatic presumption in favour. If the Council is to pull its housing delivery out of this hole it is necessary to take decisive action and plan for more housing rather than simply seeking to meet the bare minimum, which is what the draft Plan currently does.

Concluding Points:

- 3.43 This Statement demonstrates the following key points:
1. The Council has not set the housing requirement correctly and needs to plan for more homes as set out in Section 2;
 2. The Council's supply and housing trajectory does not stand up to scrutiny and fails, even on the Council's own figures, to deliver sufficient housing with a 20% buffer;
 3. When Annex 2 and Paragraph 75 are applied the Council's shortfall in delivery equates to **-3,027 dwellings**;
 4. When Annex 2 and Paragraph 75 are applied and the correct housing requirement the shortfall rises to **-7,032 dwellings**;
 5. The Plan will not maintain a 5-year housing land supply at all throughout the Plan period and,
 6. Consequently the Plan fails the tests of Soundness and should not proceed in its current form to the submission stage.

4.0 Changes Required for Soundness/Legal Compliance

4.1 Based on the evidence presented in this Statement the following changes are required to the Plan for it to be found Sound and meet the necessary Legal Compliance tests:

- 4.1.1 **Change 1** – The DtC must be revisited and proper ongoing negotiation undertaken with neighbouring authorities to correctly identify the level of unmet need;
- 4.1.2 **Change 2** – The minimum housing requirement should be increased to take account of the factors and unmet need set out in Section 2 of this Statement. This would lead to a new annual requirement of 1,903 dpa;
- 4.1.3 **Change 3** – The Council must revisit its supply sources and allocate more sites to address the deficiencies in its housing delivery trajectory and in order to provide a sufficient buffer of 20%. That would necessitate the allocation of at least a further 4,500 dwellings based on the Council's evidence of supply and requirement (Trajectory 1);
- 4.1.4 **Change 4** – Even if the Council is not intending to provide a 20% buffer into its supply in accordance with the Framework 2024 Trajectory 2 demonstrates a need for at least a further 3,000 dwellings to ensure that the minimum LHN can be met at the end of the Plan period.
- 4.1.5 **Change 5** – Based on the application of the correct minimum housing requirement that takes account of unmet need and other factors the supply shortfall to be rectified would necessitate the allocation of at least a further 7,000 dwellings.

4.2 There is a clear and present need for the Council to allocate more sites to address the deficiencies in the Plan as currently drafted, particularly in the early years of the Plan period. Without these changes the Plan is unsound and fails the Legal Compliance test in specific relation to the DtC.

Appendix 1

Assessment of Council's draft housing allocations (Tables A and B) (July 2025)

Table A - Proposed Site Allocations

	Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Proposed Site Allocations			Years 1-5					Years 6-10					Years 11-15					
Address	Reference	Cat A/B	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
Fenn Farm, Fenn Street, St Mary Hoo	AS2	B				4												4
Fenn Bell Zoo Overflow Car Park	AS6	B				18	18	4										40
	AS10	B																0
	AS11	B				10												10
	AS25	B	34															34
	AS28	B				9												9
	CCB1	A				12												12
	CCB3	A				13												13
	CCB4	B																0
	CCB7	A				9												9
	CCB8	A	164															164
	CCB12	B				18	6											24
	CCB15	B				18	18	18	6									60
	CCB19	A				13												13
	CCB20	A	50	48														98
	CCB21	A			14													14
	CCB24	A																0
	CCB25	B						44	44	44	18							150
	CCB27	B				18	2											20
	CCB30	B				18	3											21
	CCB31	A		179														179
	CCB37	B						44	44	44	44	24						200
	CCB39	B				18	6											24
	CCB41	A																0
	CCB49	B						44	44	44	18							150
	CHR14	B				18	18	13										49
	FP1	B						18	10									28
	FP6	B	102															102
	FP10	B		139														139
	FP11	B		37	45	41												123
	FP12	B				18	18	18	16									70
	FP14	A	7															7
	FP16	A																0
	FP25	B						44	44	33								121
	GN3	B						44	44	44	44							176
	GN6	B	100	100	100	100	100											500
	GN8	B				17												17
	GS2	B				18	18	9										45
	GS4	A	24															24
	GS7	A																0
	GS14	A	6															6
	GN15	B			87	87	87	87	87	87	87	87	87	87	87	87	56	1100
	GS19	A	57															57
	GS23	A																0
	GS26	B			14													14
	GS35	B				12												12
	HHH5	B				18	18	14										50
	HHH6	B		40	80	80	80	80	80	80	30							550
	HHH8	B		70	70	70	70	70	70	30								450
	HHH11	B	20	55	55	55	55											240
	HHH12	B		65	95	95	173	125	125	152	152	152	152	152	135	114	114	1801
	HHH15	A					5											5
	HHH22 & 31	B					40	60	160	180	180	180	180	180	180	180	180	1700
	HHH24	B				18	18	18	18	13								85
	HHH25	A	40	40														80
	HHH26	B	30	80	80	80	80	80	80	80	80	80	10					760
	HHH29	B				18	18	19										55
	HHH32	B				3												3
	HHH33	B						44	44	44	44	44	44	44	22			330
	HHH41	B				18	7											25
	HW3	B						44	31									75
	HW6	A				18	18	18	18	16								88
	HW11	B				18	18	18	6									60
	L7	A				6												6
	L9	B				18	4											22
	L12	B				13												13
	LW2	A	18															18
	LW4	B					68	68	68	68	68	68	68	68	68	58		670
	LW6	A	134	109	85	85	85	100	100									698
	LW7	A	50	80	80	80	80	80										450
	LW8	B		50	125	150	150	150	150	150	150	150	150	150	150	150	175	2000
	LW10	B				5												5
	REWW3	B				11												11
	RN9	B			40	80	160	240	230									750
	RN17	B			33													33
	RN22	A				8												8
	RN23	A	15	30	30													75
	RN24	A	9															9
	RN25	A																0
	RN29	B				14												14
	RN28	A		66														66
	RN30	B		40	40	10												90
	RN31	B		40	40													80
	RN32	A																

	RWB2	A	36															36
	RWB11	B	5															5
	RWB12	B				3												3
	RWB19	A	150	96														246
	RWB25	B						44	44	44								132
	SMI6	A				100	275	275	75	350	75	350	75	350	0	275	0	2200
	SNF1	B		40	40	40	40	40	40	40	40	40						360
	SNF3	B			20	75	75	75	75	75	75	75	75	75	30	0		800
	SNF5	A	8															8
	SNF8	B				18	1											19
	SNF9	B				18	18	4										40
	SNF15	B						44	44	44	44	44	44	44	42			350
	SNF17	A																0
	SNF20	B				15												15
	SNF23	A	8															8
	SNF24	A																0
	SNF27	A	13															13
	SNF30	B				9												9
	SNF31	A																0
	SNF32	A																0
	SNF34	B				18	18	16										52
	SNF35	B						44	44	44	39							171
	SNF38	B				12												12
	SNF41	B						44	44	44	44	40						216
	SNF44	B				6												6
	SR4	B		25	50	55												130
	SR5	B		60	60													120
	SR7	B	44															44
	SR14	A	44	5														49
	SR25	A	30	40	41	41												152
	SR47	A																0
	SR48	B	8															8
	SR49	B				6												6
	SR51	A		50	50	50	50	50										250
	SR53	B										138	138	138	138	138		690
	SW6	A				8												8
	SW7	B																0
	T3	A																0
	W3	A																0
	W4	B				5												5
	W7	A				21												21
TOTAL SUPPLY			1206	1584	1374	1960	1918	2251	1885	1750	1232	1334	1023	1288	897	1032	663	21397

Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15			
Proposed Site Allocations		Years 1-5					Years 6-10					Years 11-15					Commentary		
Address	Reference	Cat	A/B	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
Fenn Farm, Fenn Street, St Mary Hoo	AS2	B					4												4
Fenn Bell Zoo Overflow Car Park	AS6	B					18	18	4										40
	AS10	B																	0
	AS11	B					10												10
	AS25	B																	34
	AS28	B					9												9
	CCB1	A					12												12
	CCB3	A					13												13
	CCB4	B																	0
	CCB7	A					9												9
	CCB8	A																	164
	CCB12	B					18	6											24
	CCB15	B					18	18	18	6									60
	CCB19	A					13												13
	CCB20	A		50	48														98
	CCB21	A			14														14
	CCB24	A																	0
	CCB25	B							44	44	44	18							150
	CCB27	B					18	2											20
	CCB30	B					18	3											21
	CCB31	A			179														179
	CCB37	B							44	44	44	44	24						200
	CCB39	B					18	6											24
	CCB41	A																	0
	CCB49	B							44	44	44	18							150
	CHR14	B					18	18	13										49
	FP1	B							18	10									28
	FP6	B							102										102
Former University College for the Creative Arts	FP10	B			139														139
	FP11	B			37	45	41												123
	FP12	B					18	18	18	16									70
	FP14	A			7														7
	FP16	A																	0
	FP25	B							44	44	33								121
	GN3	B							44	44	44	44							176
	GN6	B								100	100	100	100	100					500
Pier Road, Gillingham	GN8	B					17												17
	GS2	B					18	18	9										

	GS26	B	14															14				
	GS35	B	12															12				
	HHH5	B	18					18	14												50	
Land off Chattenden Lane, Chattenden	HHH6	B							40	80	80	80	80	80	80	30	550	Previous withdrawn planning appeal for non-determination (Ref: APP/A2280/W/18/3206614) in 2018. Site being promoted but no other planning history or live application process. LAA entry from site promoter confirms earliest application submission of Q3 of 2023 (clearly not happened). Based on that submission timetable promoter says delivery in years 6-10 and NOT first 5 years. Therefore does not meet deliverability test and removed from first 5 years of plan period.				
Land West of Hoo St Werburgh	HHH8	B	70					70	70	70	70	70	30					450	Subject of live planning application (MC/25/2022) submitted in October 2024. No activity on the application file since May 2025. Unclear whether the application is therefore likely to be approved or not. In the event that the application is approved then some delivery in first 5 years is possible but promoter has confirmed minimum 24 month lead in time to delivery from consent so delivery cannot take place until at least 2027. Therefore delivery pushed back by 1 year.			
Land at Ratcliff Highway, Hoo St Werburgh	HHH11	B							20	55	55	55	55					240	LAA confirms previous planning application withdrawn and no live planning application currently. Site promoter said application would be submitted in 2023 (that has not happened). Site promoter also confirmed 24 month lead in time with delivery in years 6-10. No clear evidence of delivery to meet Annex 2 test therefore remove from 5 year period.			
Land at Main Road and Church Farm	HHH12	B							65	95	95	173	125	125	152	152	152	152	1286	No planning application activity. Site promoter confirms in LAA that delivery would take 11-15 years. Council's own evidence in LAA via Lichfields confirms 5.3 year lead in time from validation of first application to completion of first dwelling of 5.3 years for sites of this size. On the basis that no application has been submitted yet the site cannot deliver any completions in the first 5-years. Not Annex 2 compliant.		
	HHH15	A	5															5				
Land East and West of Ropers Lane	HHH22 & 31	B												40	60	160	180	180	620	LAA entry for HHH22 and HHH31 confirms application won't be submitted until 2030 at the earliest. So this site cannot possibly deliver any completions in the first 5 years. LAA entry actually confirms 11-15 year period to delivery. Not Annex 2 compliant and removed from first 5 years. Pushed back to year 11 onwards.		
	HHH24	B	18					18	18	13								85				
	HHH25	A	40					40											80			
Land to the East of High Halstow	HHH26	B							30	80	80	80	80	80	80	80	80	80	750	Hybrid application live (Ref: MC/23/0855). Application submitted for a total of 760 no. dwellings with 270 no. dwellings (Phase 1) in full detailed form. Application submitted in April 2023. Holding objection from National Highways received on 14 July 2025 requesting that the application not be determined until at least 14 October 2025 or until the issues identified are resolved, which include unacceptable impact on SRN. Site not Annex 2 compliant and therefore removed from 5-year period.		
	HHH29	B	18					18	19									55				
	HHH32	B	3															3				
	HHH33	B							44	44	44	44	44	44	44	22	330					
	HHH41	B	18					7											25			
	HW3	B							44	31									75			
	HW6	A	18					18	18	16								88				
	HW11	B	18					18	18	6									60			
	L7	A	6															6				
	L9	B	18					4											22			
	L12	B	13															13				
	LW2	A	18															18				
Land West of Shawstead Farm and East of North Dane Way	LW4	B							68	68	68	68	68	68	68	68	68	58	670	No planning history on the site. Site promoter confirms delivery in years 6-10. Not annex 2 compliant and removed from 5 year period.		
	LW6	A	134					109	85	85	85	100	100							698		
	LW7	A	50					80	80	80	80	80								450		
Land West of Capstead Road and East of Shawstead Road	LW8	B							50	125	150	150	150	150	150	150	150	175	1400	No planning history on the site. Site promoter confirms deliver in years 11-15. No timetable envisaged for the submission of a planning application by site promoter. No evidence to support the Council's change in the site's capacity from 1649 dwellings at Reg 18 to 2000 dwellings at Reg 19. Site not Annex 2 compliant and therefore removed from 5-year period. Additionally, Lichfields confirms minimum lead in time from validation of first application to first dwelling completion of 6.3 years so impossible for deliver in years 1-5.		
	LW10	B	5															5				
	REWW3	B	11															11				
Land off Pump Lane, Rainham	RN9	B							40	80	160	240	230						750	Previous negative planning history. Application refused (Ref: MC/19/1566). No new application history on the site. No delivery evidence presented in the LAA at all. Site cannot be regarded as Annex 2 compliant and therefore removed from 5-year period.		
	RN17	B	33															33				

[illegible]

Appendix 2

Trajectory 1 - Council's position on supply and requirement with the application of a 20% buffer

Housing Trajectory 1 - COUNCIL POSITION on Supply - Sedgefield 20% and 2025 based Std Method



As at: 17-Jul-25

Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Supply Sources		Years 1-5					Years 6-10					Years 11-15						
	Reference	Cat A/B	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
Large Sites Under Construction as at March 2024		A	594	286	93	253	128	119	51									1524
Large SitesPermitted but not Allocated		B	103	17		8												128
Small Sites Permitted with 15% Lapse Rate Applied		A	91	4	12	3												111
Total from Proposed Allocations			1206	1584	1374	1960	1918	2251	1885	1750	1232	1334	1023	1288	897	1032	663	21397
Windfall Allowance						132	132	132	132	132	132	132	132	132	132	132	132	1584
TOTAL SUPPLY			1993.95	1891.25	1478.9	2356.4	2178	2502	2068	1882	1364	1466	1155	1420	1029	1164	795	24743.5
Requirement			1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	24540
Annual Shortfall/Surplus			357.95	255.25	-157.1	720.4	542	866	432	246	-272	-170	-481	-216	-607	-472	-841	
Cumulative Shortfall/Surplus			357.95	613.2	456.1	1176.5	1718.5	2584.5	3016.5	3262.5	2990.5	2820.5	2339.5	2123.5	1516.5	1044.5	203.5	
Base 5 Year Requirement			8180	8180	8180	8180	8180	8180	8180	8180	8180	8180	8180	6544	4908	3272	1636	
Shortfall/oversupply (Sedgefield)			358.0	613.2	456.1	1176.5	1718.5	2584.5	3016.5	3262.5	2990.5	2820.5	2339.5	2123.5	1516.5	1044.5	203.5	
5 Year Requirement with Shortfall/oversupply			7822.1	7566.8	7723.9	7003.5	6461.5	5595.5	5163.5	4917.5	5189.5	5359.5	5840.5	4420.5	3391.5	2227.5	1432.5	
Adjuste 5 Year Requirement with 20% Buffer			9386.5	9080.2	9268.7	8404.2	7753.8	6714.6	6196.2	5901.0	6227.4	6431.4	7008.6	5304.6	4069.8	2673.0	1719.0	
Adjusted Annual Requirement (5yr)			1877.3	1816.0	1853.7	1680.8	1550.8	1342.9	1239.2	1180.2	1245.5	1286.3	1401.7	1060.9	814.0	534.6	343.8	
5 Year Supply			9898.5	10406.55	10583.3	10986.4	9994	9282	7935	7287	6434	6234	5563	4408	2988	1959	795	
Supply in Years			5.27	5.73	5.71	6.54	6.44	6.91	6.40	6.17	5.17	4.85	3.97	4.15	3.67	3.66	2.31	

Surplus/Shortfall Against Plan Requirement	As a %
203.5	1%

- Notes:
- 1 Annual Requirement applying the Std Method as at May 2025
 - 2 Supply taken from the Land Availability Assessment
 - 3 Sedgfield Method of dealing with the shortfall/oversupply
 - 4 20% Buffer to reflect latest HDT publish in December 2024

Appendix 3

Trajectory 2 – Neame Sutton position on supply and Council's position on supply with the application of a 20% buffer



Housing Trajectory 2 - NEAME SUTTON POSITION on Supply - Sedgefield 20% and 2025 based Std Method

As at: 17-Jul-25

Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Supply Sources		Years 1-5					Years 6-10					Years 11-15						
	Reference	Cat A/B	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
Large Sites Under Construction as at March 2024		A	594	286	93	253	128	119	51									1524
Large SitesPermitted but not Allocated		B	103	17		8												128
Small Sites Permitted with 15% Lapse Rate Applied		A	91	4	12	3												111
Total from Proposed Allocations			954	1084	652	1118	810	1788	1620	1868	1548	1592	1146	1368	1044	1200	839	18631
Windfall Allowance								112	112	112	112	112	112	112	112	112	112	1120
TOTAL SUPPLY			1741.95	1391.25	756.9	1382.4	938	2019	1783	1980	1660	1704	1258	1480	1156	1312	951	21513.5
Requirement			1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	1636	24540
Annual Shortfall/Surplus			105.95	-244.75	-879.1	-253.6	-698	383	147	344	24	68	-378	-156	-480	-324	-685	
Cumulative Shortfall/Surplus			105.95	-138.8	-1017.9	-1271.5	-1969.5	-1586.5	-1439.5	-1095.5	-1071.5	-1003.5	-1381.5	-1537.5	-2017.5	-2341.5	-3026.5	
Base 5 Year Requirement			8180	8180	8180	8180	8180	8180	8180	8180	8180	8180	8180	6544	4908	3272	1636	
Shortfall/oversupply (Sedgefield)			106.0	-138.8	-1017.9	-1271.5	-1969.5	-1586.5	-1439.5	-1095.5	-1071.5	-1003.5	-1381.5	-1537.5	-2017.5	-2341.5	-3026.5	
5 Year Requirement with Shortfall/oversupply			8074.1	8318.8	9197.9	9451.5	10149.5	9766.5	9619.5	9275.5	9251.5	9183.5	9561.5	8081.5	6925.5	5613.5	4662.5	
Adjuste 5 Year Requirement with 20% Buffer			9688.9	9982.6	11037.5	11341.8	12179.4	11719.8	11543.4	11130.6	11101.8	11020.2	11473.8	9697.8	8310.6	6736.2	5595.0	
Adjusted Annual Requirement (5yr)			1937.8	1996.5	2207.5	2268.4	2435.9	2344.0	2308.7	2226.1	2220.4	2204.0	2294.8	1939.6	1662.1	1347.2	1119.0	
5 Year Supply			6210.5	6487.55	6879.3	8102.4	8380	9146	8385	8082	7258	6910	6157	4899	3419	2263	951	
Supply in Years			3.20	3.25	3.12	3.57	3.44	3.90	3.63	3.63	3.27	3.14	2.68	2.53	2.06	1.68	0.85	

Surplus/Shor As a %
-3026.5 -12%

Notes:

- 1 Annual Requirement applying the Std Method as at May 2025
- 2 Supply taken from the Land Availability Assessment and Adjusted to Reflect Annex 2 Definition of Deliverability and Compelling Evidence Test for Windfalls
- 3 Sedgefield Method of dealing with the shortfall/oversupply
- 4 20% Buffer to reflect latest HDT publish in December 2024

Appendix 4

Trajectory 3 – Neame Sutton position on supply and requirement with application of a 20% buffer

Housing Trajectory 3 - NEAME SUTTON POSITION on Requirement & Supply - Sedgefield 20% & 2025 Std Method



As at: 17-Jul-25

Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Supply Sources		Years 1-5					Years 6-10					Years 11-15						
	Reference	Cat A/B	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	TOTAL
Large Sites Under Construction as at March 2024		A	594	286	93	253	128	119	51									1524
Large SitesPermitted but not Allocated		B	103	17		8												128
Small Sites Permitted with 15% Lapse Rate Applied		A	91	4	12	3												111
Total from Proposed Allocations			954	1084	652	1118	810	1788	1620	1868	1548	1592	1146	1368	1044	1200	839	18631
Windfall Allowance								112	112	112	112	112	112	112	112	112	112	1120
TOTAL SUPPLY			1741.95	1391.25	756.9	1382.4	938	2019	1783	1980	1660	1704	1258	1480	1156	1312	951	21513.5
Requirement			1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	1903	28545
Annual Shortfall/Surplus			-161.05	-511.75	-1146.1	-520.6	-965	116	-120	77	-243	-199	-645	-423	-747	-591	-952	
Cumulative Shortfall/Surplus			-161.05	-672.8	-1818.9	-2339.5	-3304.5	-3188.5	-3308.5	-3231.5	-3474.5	-3673.5	-4318.5	-4741.5	-5488.5	-6079.5	-7031.5	
Base 5 Year Requirement			9515	9515	9515	9515	9515	9515	9515	9515	9515	9515	9515	7612	5709	3806	1903	
Shortfall/oversupply (Sedgefield)			-161.1	-672.8	-1818.9	-2339.5	-3304.5	-3188.5	-3308.5	-3231.5	-3474.5	-3673.5	-4318.5	-4741.5	-5488.5	-6079.5	-7031.5	
5 Year Requirement with Shortfall/oversupply			9676.1	10187.8	11333.9	11854.5	12819.5	12703.5	12823.5	12746.5	12989.5	13188.5	13833.5	12353.5	11197.5	9885.5	8934.5	
Adjuste 5 Year Requirement with 20% Buffer			11611.3	12225.4	13600.7	14225.4	15383.4	15244.2	15388.2	15295.8	15587.4	15826.2	16600.2	14824.2	13437.0	11862.6	10721.4	
Adjusted Annual Requirement (5yr)			2322.3	2445.1	2720.1	2845.1	3076.7	3048.8	3077.6	3059.2	3117.5	3165.2	3320.0	2964.8	2687.4	2372.5	2144.3	
5 Year Supply			6210.5	6487.55	6879.3	8102.4	8380	9146	8385	8082	7258	6910	6157	4899	3419	2263	951	
Supply in Years			2.67	2.65	2.53	2.85	2.72	3.00	2.72	2.64	2.33	2.18	1.85	1.65	1.27	0.95	0.44	

Surplus/Shor As a %

-7031.5 -25%

Notes:

- 1 Annual Requirement applying the Std Method as at May 2025
- 2 Supply taken from the Land Availability Assessment and Adjusted to Reflect Annex 2 Definition of Deliverability and Compelling Evidence Test for Windfalls
- 3 Sedgfield Method of dealing with the shortfall/oversupply
- 4 20% Buffer to reflect latest HDT publish in December 2024

Appendix D: Duty to Cooperate Technical Paper

Town and Country Planning Act 1990 (As Amended)

Medway Local Plan 2041- Pre-Submission Draft (Regulation 19)

Representations on Behalf of: **Catesby Strategic Land Limited.**

August 2025



REGULATION 19 STATEMENT ON BEHALF OF CATESBY STRATEGIC LAND LIMITED

Technical Report

Legal Compliance: The Duty to Cooperate

Prepared by:

Rhiannon Jones BSc (Hons) MSc MA MRTPI

Associate – Neame Sutton Limited

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Appendices

Appendix 1	Review of the Record of Engagement
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1. Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Catesby Strategic Land Limited ("Catesby") to prepare a Duty to Cooperate Statement to the Regulation 19 consultation of the Medway Local Plan 2041: Pre-Submission Draft (herein referred to as the Pre-Submission Plan).
- 1.2 In preparing this Technical Report on Duty to Cooperate due regard has been had to Government policy set out in the Framework 2024 and accompanying Planning Practice Guidance ("PPG") and in particular the relevant tests of Soundness set out at Paragraph 16 of the Framework, namely that the Plan should be:
 - a) Contributing to Sustainable Development
 - b) Positively Prepared.
 - c) Should be a collaborative document between stakeholders, including adjacent authorities.
 - d) Clear and justified Policies
 - e) Be accessible.
 - f) Purposeful and Consistent with National Policy
- 1.3 This Statement looks at the legal matter of the Duty to Cooperate as a discrete topic and should be read in conjunction with other Pre-Submission Plan Regulation 19 Representations made by Catesby Estates Strategic Land Limited, including the Technical Report- Housing Need and Supply Statement.

2. The Duty to Cooperate Legal Framework

- 2.1 For a Local Plan to be found legally sound, the submitting Local Planning Authority must demonstrate that they have cooperated with Local Planning Authorities, County Councils, and prescribed bodies through the Duty to Cooperate, about planning for sustainable development. The requirement for effective cooperation is set out in the NPPF (2024), paragraph 24, and the Localism Act 2011.
- 2.2 To demonstrate the Duty to Cooperate ("DtC"), the Council is required to submit a Duty to Cooperate Statement when the plan is submitted (section 20 of the Planning and Compulsory Purchase Act 2004). A draft Duty to Cooperate Statement has been provided with this Regulation 19 Consultation.
- 2.3 National Planning Practice Guidance sets out the following about the legal framework for the DtC:

"The duty to cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, as well as prescribed public bodies, to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross-boundary matters.

Paragraph: 029 Reference ID: 61-029-20190315"

- 2.4 The Case Law and Planning Practice Guidance (PPG) is clear that the DtC must be evidenced and cannot be rectified after the submission of the plan, this is because it directly relates to plan production. DtC cannot be rectified by a main modification at the Examination to make the plan sound.
- 2.5 A way of demonstrating effective engagement is through a Statement of Common Ground, which should reflect discussions undertaken during the plan's production. PPG states the following:

"A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate."

Paragraph: 010 Reference ID: 61-010-20190315 Revision date: 15 03 2019

- 2.6 This statement reflects Catesby's review of the draft Duty to Cooperate Statement by Medway Council, which is part of the evidence base of this Pre-Submission Plan. This Statement examines the records of engagement made by the council and notes any omissions that the Council must consider ensuring a sound plan.

3. Who should Medway Council be engaging with under the Duty to Cooperate?

3.1 Medway Council is directed by the legal framework on who, at a minimum, should be engaged with under the Duty to Cooperate (section 33A of the Planning and Compulsory Purchase Act 2004). Catesby believes that Medway Council should engage with the following Local Authorities under the DtC. This recommendation is based on their geographical proximity to Medway, as well as existing or emerging strategic relationships, particularly in relation to infrastructure provision, housing markets, transport networks, environmental constraints, and economic interdependencies.

- Gravesham Borough Council
- Swale Borough Council
- Maidstone Borough Council
- Tonbridge and Malling Borough Council
- Dartford Borough Council
- Canterbury City Council
- London Borough of Bexley
- London Borough of Bromley
- Thurrock Council
- Kent County Council

3.2 Medway Council should also engage with the following Prescribed Bodies:

- Natural England
- Environment Agency
- National Highways
- NHS Kent & Medway Integrated Care Board (ICB)
- Historic England
- Homes England
- Transport for the South East
- Marine Management Organisation
- Kent Downs National Landscape
- National Landscape (Kent Downs)
- National Rail
- Medway NHS Foundation Trust
- Southern Water
- UK Power Networks
- Port of London Authority

4. Available evidence of Duty to Cooperate

4.1 The Council has set out its engagement with stakeholders in the Duty to Cooperate Statement (Regulation 19) (June 2025). Within the statement, there is a table (Appendix A- Record of Engagement Activity) which sets out the type and date of engagement with local authorities and prescribed bodies.

4.2 The DtC Statement has been produced so that it summarises activity relating to 10 discrete strategic matters, which are:

- Housing requirement
- Strategic Sites
- Green Belt
- Natural Environment
- Historic Environment
- Strategic Road Network and Major Road Network
- Air Quality
- Flood Risk and Water Management
- Minerals Supply
- Waste Management

4.3 Of matters included in DtC discussions to date, Catesby has concerns about discussions relating to housing requirements and specifically the unmet need of adjacent local authorities, and the growing and ever-present housing needs of London.

Unmet need

4.4 Catesby's detailed concerns regarding Medway Council's approach to the unmet housing needs of neighbouring authorities are set out fully in the Catesby Strategic Land Limited Technical Report – Housing Need and Supply (July 2025). This section summarises the key issues relevant to unmet need and the DtC and should be read in conjunction with the full technical report.

4.5 A consistent and significant concern is the lack of transparency surrounding the Council's DtC process. There is no publicly available evidence of meeting agendas, records of discussions, or minutes to demonstrate how cooperation has been undertaken. As such, there is no way to verify whether Medway has proactively and explicitly asked neighbouring authorities if they have unmet housing needs—a core requirement of the DtC.

4.6 Available evidence strongly suggests that several neighbouring authorities are experiencing or will imminently experience unmet housing need. Gravesham Borough Council has persistently requested assistance from Medway in addressing its unmet need. Swale Borough Council also faces constraints that prevent it from meeting its full Local Housing Need, in part due to pressures arising from London. Tonbridge and Malling Borough Council is also anticipated to have a shortfall. In addition, Thurrock Council—closely linked to Medway through the proposed Lower Thames Crossing—currently has only around one year's supply of housing land, and it is expected that it will be unable to meet its full Local Housing Need.

4.7 It is evident that the issue of unmet housing needs has either not been raised or has been sidestepped in DtC discussions by Medway Council. This appears to stem from a lack of detail in the plan's vision and spatial strategy. Consequently, the minimum Pre-Submission Plan housing requirement does not account for any potential unmet need from other authorities. Furthermore, the growth options outlined in the Sustainability Appraisal (SA) reflect this limited engagement, as none of the appraised strategies consider accommodating unmet needs from the authorities mentioned above.

- 4.8 Catesby reserves the right to make further submissions on this matter should additional evidence of DtC engagement (such as agendas or minutes) become available. However, based on the evidence currently before us, it is evident that the issue of unmet need in adjacent authorities has not been addressed in a constructive, active, or ongoing manner as required by national policy. The plan, therefore, fails the legal test of the DtC and is unsound in this regard.

Omitted DtC matters.

- 4.9 From a review of the Duty to Cooperate Statement, the Council has failed to demonstrate engagement with other bodies on strategic matters relating to:

- Employment and economic development
- Health and Social Infrastructure
- Utilities
- Discrete housing subtopic- Gypsy and Travellers

- 4.10 The matters set out above are integral to plan production, and it is a shortfall of Medway Council to not have included these in the DtC discussions. Table 1 in Appendix 1 to this Statement sets out which authorities these matters best relate to, though the list within the table is not exhaustive, and they may affect other bodies and institutions than those noted.

- 4.11 Catesby sets out below why each omitted matter is considered appropriate to include in DtC.

Employment and economic development

- 4.12 Regarding Employment and economic development, Medway forms part of larger functional economic market areas, including Thames Gateway, South Essex, and parts of North Kent. Economic interdependence demands formal collaboration—particularly around:

- Shared labour markets.
- Logistics and infrastructure.
- Strategic employment land allocations.
- Innovation, university links, and training provision.

- 4.13 Medway's two industrial estuary locations on the Hoo have regional and national importance. Medway's failure to document engagement on economic development matters implies that strategic employment needs may have been planned in isolation, undermining the "positively prepared" soundness test under paragraph 35 of the NPPF.

Health and Social Infrastructure

- 4.14 Given Medway's population growth targets (over 24,540 homes), the omission of any discussions of Health and Social Infrastructure is unacceptable. Planning for sustainable growth must include capacity planning for GPs, hospitals, adult social care, schools, and mental health services.

- 4.15 There is no evidence of engagement with:

- NHS Kent and Medway Integrated Care Board (ICB) or local health trusts.
- Neighbouring social services departments.
- Children's services and education authorities, including Kent County Council.

- 4.16 Failure to consult with relevant infrastructure providers places service delivery at risk, and contradicts Planning Practice Guidance (PPG, Paragraph 061, Reference ID: 61-061-20190315) on the need for integrated infrastructure planning.

Utilities

- 4.17 Strategic infrastructure like water supply, wastewater, energy, and digital connectivity cannot be planned in isolation—especially where:
- Water supply and sewerage are managed by Southern Water and Thames Water, both of which serve cross-boundary catchments.
 - Wastewater treatment and nutrient loading (e.g., to the Medway Estuary or Stodmarsh catchment) are subject to joint environmental constraints.
 - Electricity grid capacity affects regional development potential.
 - Future growth must align with the government's carbon reduction target.
- 4.18 No formal consultation with utilities under the DtC framework represents a clear procedural failure—potentially exposing the Local Plan to soundness challenges and risking future delivery blockages.

Gypsy and Traveller

- 4.19 The NPPF (paragraph 63, 2024) and Planning Policy for Traveller Sites (2024) require that Local Plans:
- Assess the accommodation needs of Gypsies and Travellers.
 - Engage with neighbouring authorities where the need cannot be met locally.
 - Ensure any site allocations are coordinated strategically across local authority boundaries.
- 4.20 There is no evidence that Medway has:
- Engaged with Kent authorities to understand broader Traveller accommodation needs.
 - Considered how unmet needs may be addressed via cross-boundary cooperation.
 - Discussed transit site provision.
- 4.21 This failure to engage on a protected equality group raises not only planning soundness concerns, but potential Public Sector Equality Duty (PSED) implications under the Equality Act 2010. It is recognised that Medway may be able to accommodate its own traveller needs. Medway Council should be asking the reciprocal question of whether they need to accommodate other authorities' unmet needs, not just their own. This contributes to the wider discussion of unmet housing need set out in paragraphs 4.4- 4.8 above.

Evidence

- 4.22 Catesby is concerned with the lack of transparency of Medway Council in matters relating to DtC. There are no records available in the DtC Statement of agendas or agreed meeting minutes that support the matters ticked within the table (Appendix A, DtC Statement).
- 4.23 Medway Council's DtC process is not transparent, and in the wholesale absence of Statements of Common Ground between Medway Council and other bodies, including other Local Planning Authorities, Catesby is unable to conclude that engagement under the DtC has been effective and appropriately timed to influence plan production. It is clear from Appendix 1, Table 1, and as detailed above, the Council has not undertaken effective DtC on all strategic matters that impact plan-making in Medway.
- 4.24 As set out in Appendix 1, Table 1, the Council has failed to have effective engagement with:
- Gravesham Borough Council
 - Swale Borough Council
 - Maidstone Borough Council
 - Tonbridge and Malling Borough Council
 - Thurrock Council
- 4.25 The Council has entirely omitted the following councils and bodies from any DtC to date:
- Dartford Borough Council
 - Canterbury City Council
 - London Borough of Bexley
 - London Borough of Bromley
 - Port of London Authority
 - Homes England
 - Transport for the South East
 - Marine Management Organisation
 - NHS Kent and Medway Integrated Care Board (ICB)
 - Civil Aviation Authority

5. Recommendation

- 5.1 In light of the Council's failure to demonstrate effective and ongoing engagement under the DtC, it is essential that immediate corrective actions are taken. Catesby therefore recommends the following steps:
1. The Council must undertake meaningful and effective DtC discussions with all bodies set out in Appendix 1 (tables 1 and 2)
 2. The Council must publish, maintain, and update Statements of Common Ground or Memoranda of Understanding, setting out the strategic matters which exist between statutory bodies and other Local Authorities

3. The Council must keep an accurate record of engagement, including matters Catesby considers have been omitted, including meeting agendas and minutes. These documents should be made publicly accessible as soon as possible.
4. The Council must reconsider its Local Plan strategy regarding meaningful, effective, and targeted discussion about unmet needs in Local Authorities close to and adjacent to Medway. The Council will be required to revise its supporting documents to reference any change to the plan strategy (Sustainability Appraisal, Habitat Regulation Assessment, and relevant topic papers, etc).

6. Conclusions

- 6.1 The DtC is a legal obligation and a foundational element of effective plan-making. As it currently stands, Medway Council has not demonstrated the level of engagement required under national policy and legislation to support the soundness and legal compliance of its emerging Local Plan. In particular, the absence of documented, constructive cooperation on strategic matters such as housing needs, infrastructure, and cross-boundary coordination presents a significant risk to the Plan's progression.
- 6.2 To address this, it is imperative that the Council urgently undertake the recommended actions set out above. This includes re-engaging with all relevant and prescribed bodies, producing transparent records of cooperation, and revisiting key elements of its spatial strategy where necessary. Without these corrective steps, the Plan remains vulnerable to challenge at Examination and may be found unsound on both procedural and strategic grounds.
- 6.3 Catesby urges the Council to act swiftly and collaboratively to meet its statutory duties and to ensure that the Local Plan can proceed with confidence and compliance.

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Model Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this
representation relates:

Medway Local Plan

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

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Victoria"/>	<input type="text" value="Philippa"/>
Last Name	<input type="text" value="Groves"/>	<input type="text" value="Robinson"/>
Job Title (where relevant)	<input type="text" value="Area Planning Director"/>	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Catesby Strategic Land"/>	<input type="text" value="Savills"/>
Address Line 1	<input type="text" value="The Grosvenor"/>	<input type="text" value="74 High Street"/>
Line 2	<input type="text" value="Basing View"/>	<input type="text" value="Sevenoaks"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="RG21 4HG"/>	<input type="text" value="TN13 1JR"/>
Telephone Number	<input type="text" value="C/o agent"/>	<input type="text" value=""/>
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 Policy Policies Map

4. Do you consider the Local Plan is :

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

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 accompanying Representations

(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 accompanying Representations

(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

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 ensure the plan is sound and legally compliant. Please see representations.

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.

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