

Medway Local Plan Examination

Consultation on Supporting Documents – June-July 2026

Appendix A:

Representations Received

July 2026

Medway Local Plan 2041 - Supporting Evidence Documents

All responses received are presented in the following order

There were 51 responses received from 43 respondents via Email and OpusConsult.

Responses

ID	NAME	TYPE OF RESPONDENT	CHANNEL
5091, 5090, 5094, 5093, 5092, 5089 5100	Mrs Elizabeth Turpin	MPs, Members and Parish Councils	OPUS
	Jona Infrastructure Delivery	Developers or Agents	OPUS
5085, 5086 & E.2 5098	Mrs Jennifer Price	Members of the Public	OPUS & Email
	RSPB England	Voluntary and Community Organisations	OPUS
5083	Mrs Christine Marsh	Members of the Public	OPUS
5084	Mr Stephen Hubbard	MPs, Members and Parish Councils	OPUS
5095	Mrs Lindsey Morgan	Members of the Public	OPUS
5096	Mr Mark Batchelor	Members of the Public	OPUS
5099	Mrs Lorena Hatton	Members of the Public	OPUS
5097	Holbrook Griffith Developments Limited	Developers or Agents	OPUS
5087, 5088	Sport England	Statutory Bodies	OPUS
E.1	Jean Winter	Members of the Public	Email
E.3	CPRE	Voluntary and Community Organisations	Email
E.4	Chatham Maritime Trust	Voluntary and Community Organisations	Email
E.5	Southern Water	Utility provider	Email
E.6	Ray Dines	MPs, Members and Parish Councils	Email

ID	NAME	TYPE OF RESPONDENT	CHANNEL
E.7	Kevin and Sue Smith	Members of the Public	Email
E.8	Boxley Parish Council	MPs, Members and Parish Councils	Email
E.9	Catesby Strategic Land Limited	Developers or Agents	Email
E.10	Nicola Smith	Members of the Public	Email
E.11	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils	Email
E.12	Tracy Charlesworth	Members of the Public	Email
E.13	Save the Hoo Peninsula Campaign	Voluntary and Community Organisations	Email
E.14	Peel Waters	Developers or Agents	Email
E.15	Environment Agency	Statutory Bodies	Email
E.16	Rebecca Smith	Members of the Public	Email
E.17	Natural England	Statutory Bodies	Email
E.18	Lynn Wilson	Members of the Public	Email
E.19	Catesby Strategic Land	Developers or Agents	Email
E.20	Hallam Land	Developers or Agents	Email
E.21	Helen Leydon	Members of the Public	Email
E.22	Lee Squires	Members of the Public	Email
E.23	Halling Parish Council	MPs, Members and Parish Councils	Email
E.24	National Highways	Statutory Bodies	Email
E.25	Natalie Hale	Members of the Public	Email
E.26	Simon Crane	Members of the Public	Email
E.27	Ted Butcher	Members of the Public	Email
E.28	J Stocker	Members of the Public	Email
E.29	Homes England	Developers or Agents	Email

ID	NAME	TYPE OF RESPONDENT	CHANNEL
E.30	Joe S	Members of the Public	Email
E.31	Hoo Consortium	Developers or Agents	Email
E.32	Allhallows Parish Council	MPs, Members and Parish Councils	Email
E.33	Sutay Fallarino	Members of the Public	Email

Documents that were updated between June and December 2025 and published in December 2025 with the submission of the plan, B2 Infrastructure Delivery Plan (December 2025)

5091

Comment

Respondent: Mrs Elizabeth Turpin

Summary:

I still remain concerned about how education provision will be funded. Section 106 accounts for less than half of what is required within the plan. How therefore will this be delivered?
Hospital capacity is already at breaking point and can't cope with existing need, let alone development of proposed scale.
Medway is already behind national 5G rollout figures, by over 20% The Hoo Peninsula is particularly underserved. with 3G being phased out this is very concerning.
Again funding of major highway upgrades remain dependant on uncertain government financing.

Full text:

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Medway is already behind national 5G rollout figures, by over 20% The Hoo Peninsula is particularly underserved. with 3G being phased out this is very concerning.
Again funding of major highway upgrades remain dependant on uncertain government financing.

Attachments: None

5100

Comment

Respondent: Jona Infrastructure advisory

Summary:

The Infrastructure Delivery Schedule identifies the estimated cost, delivery timeframe, funding source and priority level for each infrastructure project. However, it does not appear to provide a Benefit-Cost Ratio or value-for-money assessment for each scheme. How has Medway Council assessed the economic, social and environmental benefits of each infrastructure project against its estimated cost, and will the Council publish Benefit-Cost Ratios or equivalent value-for-money evidence for the key strategic infrastructure schemes?

Full text:

The Infrastructure Delivery Schedule identifies the estimated cost, delivery timeframe, funding source and priority level for each infrastructure project. However, it does not appear to provide a Benefit-Cost Ratio or value-for-money assessment for each scheme. How has Medway Council assessed the economic, social and environmental benefits of each infrastructure project against its estimated cost, and will the Council publish Benefit-Cost Ratios or equivalent value-for-money evidence for the key strategic infrastructure schemes?

Attachments: None

Documents that were updated between June and December 2025 and published in December 2025 with the submission of the plan, B22.10 Health and Wellbeing Topic Paper

5090

Comment

Respondent: Mrs Elizabeth Turpin

Summary:

There are many big challenges to tackle within Medway including the 7 year life expectancy gap between different areas. I am pleased to read of planning policy to address issues such as increasing numbers of obese children leaving year 6 by limiting food takeaways near schools and support active lifestyles in our new communities.

Full text:

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Attachments: None

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan, B22.1 Site Selection Topic Paper

5085

Comment

Respondent: Mrs Jennifer Price

Summary:

I object to the proposed removal of Chapter Farm (southern Parcel 1) from the Green Belt because it is inconsistent with Green Belt policy and unsupported by exceptional circumstances. The site plays an important role in preventing urban sprawl and maintaining separation between Gravesham and the Medway Towns. Its release would weaken the remaining Green Belt, increase pressure for further development, worsen congestion on the Wainscott Bypass, increase flood risk, result in the loss of productive farmland, and harm the rural character, amenity, and wellbeing of nearby residents, including those in Strood.

Full text:

I object to the proposed removal of Chapter Farm (southern Parcel 1) from the Green Belt because it is inconsistent with Green Belt policy and unsupported by exceptional circumstances. The site plays an important role in preventing urban sprawl and maintaining separation between Gravesham and the Medway Towns. Its release would weaken the remaining Green Belt, increase pressure for further development, worsen congestion on the Wainscott Bypass, increase flood risk, result in the loss of productive farmland, and harm the rural character, amenity, and wellbeing of nearby residents, including those in Strood.

Attachments: None

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan, B22.2 Hoo Peninsula Strategic Environmental Programme Topic Paper

5094

Comment

Respondent: Mrs Elizabeth Turpin

Summary:

this topic paper explains what the programme aims to achieve but not giving detail on how and the funding, as it does not identify costs or contribution rates. There is a heavy reliance on old evidence. This is largely aspirational and relies on many organisations working together which will provide governance challenges.

Full text:

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Attachments: None

5098

Comment

Respondent: RSPB England**Summary:**

It has not been possible for the RSPB to review this Topic Paper within the consultation period. We therefore reserve the right to provide our comments on the contents of this document through the Medway Local Plan examination process, including as part of any discussions relating to the protection of the Chattenden Woods and Lodge Hill SSSI.

The Nightingale Impact Assessment (Appendix 3) makes reference to an additional Nightingale literature review. We have been unable to find a copy of this on the Council's Local Plan pages and kindly request a copy of this document.

Full text:

It has not been possible for the RSPB to review the Hoo Strategic Environmental Topic Paper and its technical appendices within the consultation period. We therefore reserve the right to provide our comments on the contents of this important document through the Medway Local Plan examination process, including as part of any discussions relating to the protection of the Chattenden Woods and Lodge Hill SSSI from the effects of new development.

We note that the Nightingale Impact Assessment (Appendix 3) makes reference to an additional Nightingale literature review, undertaken to assist with the evaluation of potential impacts on breeding Nightingales from development proposed within the Local Plan. We have been unable to find a copy of this literature review on the Council's Local Plan pages. We kindly request a copy of this document at the earliest opportunity in order that we may fully assess the evidence underpinning the Local Plan.

Attachments: None

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan, B22.4 Green Belt Exceptional Circumstances Topic Paper

5083

Comment

Respondent: Mrs Christine Marsh**Summary:**

There is still no explanation of how the arable farmland North of Rede Court Road can be considered "grey belt." If both Medway council and GBC develop Chapter Farm, Gravesham and Strood will cease to be separate communities. This parcel of land therefore contributes significantly to the purposes of Green Belt and, contrary to the conclusion reached by MC and GBC, its removal would cause considerable harm to those purposes. Whilst Rochester Football Club meets the criteria for classification as Grey Belt, development should be providing opportunities for sport and leisure, not removing them.

Full text:

In document B22.4 there is still no explanation of how the arable farmland North of Rede Court Road can be considered "grey belt."

The parcel of land West of Strood, is by Medway Council's own admission, a narrow strip of Green Belt. Surely then, if it becomes narrower because GBC build on Chapter Farm, it would contribute more to the functions of the Green Belt, not less. If Medway Council develop their part of the Green Belt, there will be no boundary between Gravesham and this part of Strood and they will not remain separate entities. This parcel of land therefore contributes significantly to the purposes of Green Belt and, contrary to the conclusion reached by MC and GBC, its removal would cause considerable harm to those purposes.

Whilst Rochester Football Club meets the criteria for classification as Grey Belt, development should be providing opportunities for sport and leisure, not removing them.

Attachments: None

5084

Comment

Respondent: Mr Stephen Hubbard**Summary:**

I honestly believe that what was to become the Land West of Strood Policy SA6 was predetermined very early on during the process of producing Medway's Local Plan. The 'grey belt' changes to the NPPF were built into the emerging Policy SA6 as justification, as was the 'Duty to Cooperate' with Gravesham Council.

No information about discussions with members of Medway Council or Gravesham Council.

Or details of the guidance / instruction given by Medway Councillors.

Or details of any discussions with the housing developers, who had been actively promoting for years the development of Strood's Green Belt.

Full text:

Before I make comment on Medway Council's Green Belt Exceptional Circumstances Topic Paper, December 2025, please note the following comments I made on the June 2025 supporting document Medway Local Plan Green Belt

Review, at the 2025 consultation.

In this document Medway's Greenbelt was split into nineteen parcels. The review was to decide what Greenbelt parcel was to be reclassified as Greybelt. The map at section 2.6 page 11 shows the Greenbelt parcels, while the table at section 4.3 is a summary that indicates which parcel is to be Greybelt. The map & table refers to 20 parcels. Parcel 1 is in Gravesham BC.

The review seems to be a hurried affair. It gives the impression of predetermination as suspiciously the first four parcels, 1 to 4, are the only parts of the Greenbelt to be named in the Local Plan as preferred sites for housing development, i.e. Land West of Strood.

The individual assessments for parcels 1 to 4 (Sections 3.1, 3.2, 3.3 & 3.4) all say that their development would not result in the merger of Strood & Gravesend, and thus suitable to be Greybelt. This reason is given great weight. However, there is no consideration given that the development of parcels 1 to 4 would result in an unacceptable increase in the urban size of Strood.

With reference to the Policies Map – South West. Other evidence that the review of the Greenbelt and the Residential-led Site Allocation was a rushed affair, with extremely poor attention to detail. On the South West Policies Map it shows the former quarry alongside Commissioners Road, Strood as being part of Strood's Green Belt. This is clear nonsense. It has never been Greenbelt. Back in the 2003 Medway Local Plan the site of Commissioners Rd Pit was given a 'Protection of Open Space L3' definition.

This definition was challenged and a planning application for a housing development of some 130 residential dwellings in Commissioners Rd Pit was approved back in 2017. The infilling of the pit started in 2019, now completed and the site is now ready for the build to start.

Comments on Medway Council's Green Belt Exceptional Circumstances Topic Paper, December 2025.

As I said before, I generally welcome Medway's Local Plan, with the omission of not supporting the housing allocation detailed in 14.10 Policy SA6 (reference the South West Policy Map numbers SNF1, SNF3 and SR5).

Green Belt Policy S7 is found in section 4.12 of the Medway Local Plan 2041, Proposed Submission Draft, Regulation 19. Land West of Strood Policy SA6 is found in section 4.10. These two Regulation 19 policies appeared 'out the blue' and were radically near opposite to the Green Belt policies that appeared at the previous Regulation 18 stage.

Land West of Strood Policy SA6 fails to truly honestly consider several matters including,

- Brownfield development first approach
- Urban Sprawl
- Overstretched infrastructure, including retail
- Insufficient medical and health facilities
- Limited education facilities, SEN school places for example
- Poor road infrastructure
- Potential water supply shortages
- Increased air pollution
- Poor quality of life matters

The December 2025 Green Belt Exceptional Circumstances Topic Paper somewhat builds upon the June 2025 Green Belt Review. The Topic Paper seeks to clarify matters that fell short in the original Review. The significant comment is at 2.1 National guidance. National Planning Policy Framework (NPPF) was updated in December 2024 introducing the term 'grey belt', with guidance following in February 2025. I have noted when reading up on that guidance it was not fixed and firm at the launch of Medway's Local Plan Regulation 19 in June 2025. There have been challenges, still on going, to NPPF's 'grey belt' guidance, as councils across the country struggle with the 'grey belt' definition.

I honestly believe that what was to become the Land West of Strood Policy SA6 was predetermined very early on during the process of producing Medway's Local Plan. The 'grey belt' changes to the NPPF were built into the emerging Policy SA6 as justification, as was the 'Duty to Cooperate' with Gravesham Borough Council.

it is clear that Medway Council, Gravesham Council and a number of volume housing developers have been discussing over a long period of time what is now Policy SA6.

The Topic paper like the Review before it fails to detail meetings between Medway Council, Gravesham Council and volume housing developers. The minutes of those meetings do not appear in the evidence base documents. They should have been made available for review and consulted upon.

The Planning Inspectors wrote to Medway Council on the 27th March 2026 asking several detailed questions across a number of subjects. The Green Belt questions 'Paragraph 23' and 'Paragraph 24' related to the co-ordination with Gravesham Council and asked for details of the nature of the discussions with Gravesham, including working groups, meetings, minutes, Council resolutions, or similar." Additionally, it also requested clarification of "a coordinated approach to methodology has taken place and if consideration has been given to whether there would be exceptional

circumstances to justify the release of land to the west of Strood, were the release of Green Belt land in the adjoining part of Gravesham not to occur."

Medway Council replied to those questions in its letter to the Planning Inspectors dated 8th May. The letter's appendixes 2, 3 & 4 gave greater detail. However, the council only gave details in the replies that related to the engagement between officers working for Medway Council and Gravesham Council.

Medway Council officers did not volunteer any information about discussions with members of Medway Council or Gravesham Council. They also did not provide details of the guidance / instruction given to them by Medway Councillors, that started before Regulation 18.

They also did not volunteer any discussions with the volume housing developers, who had been actively promoting, and strongly lobbying, the development of Green Belt, Land West of Strood, for many years. From long before Regulation 18.

I am aware of discussions had by members and developers, with officers, up the end of 2023. Plus, the lobbying by developers. I was the Chair of Medway Council's Planning Committee up to February 2024. Those discussions would have carried on, changing their nature before the current Government updated its NPPF in December 2024, introducing 'grey belt'.

I was briefed by Medway Council's relevant Cabinet Portfolio Holder on the 2nd August 2024 on Government's emerging 'grey belt' policy and its impact on Strood's Green Belt. This briefing was given after Medway Council officers and members had been briefed themselves by the Government.

My concern is that there was a significant level predestination thinking that resulted in Regulation 19 Green Belt Policy S7 being significantly different from the Green Bely policy that was presented by Medway Council at Regulation 18.

This predestination was the result of pressure from the large volume housing developers, Gravesham Council and Medway Council members.

Attachments:

 Cllr Hubbard LP 2026 follow up consultation - Stroods Green Belt.pdf - <https://medway.oc2.uk/a/z4>

Please note:  files require a system login to access them.

See below for full
response

Comments made by Councillor Stephen Hubbard, Medway Council member for Strood North and Frindsbury Ward

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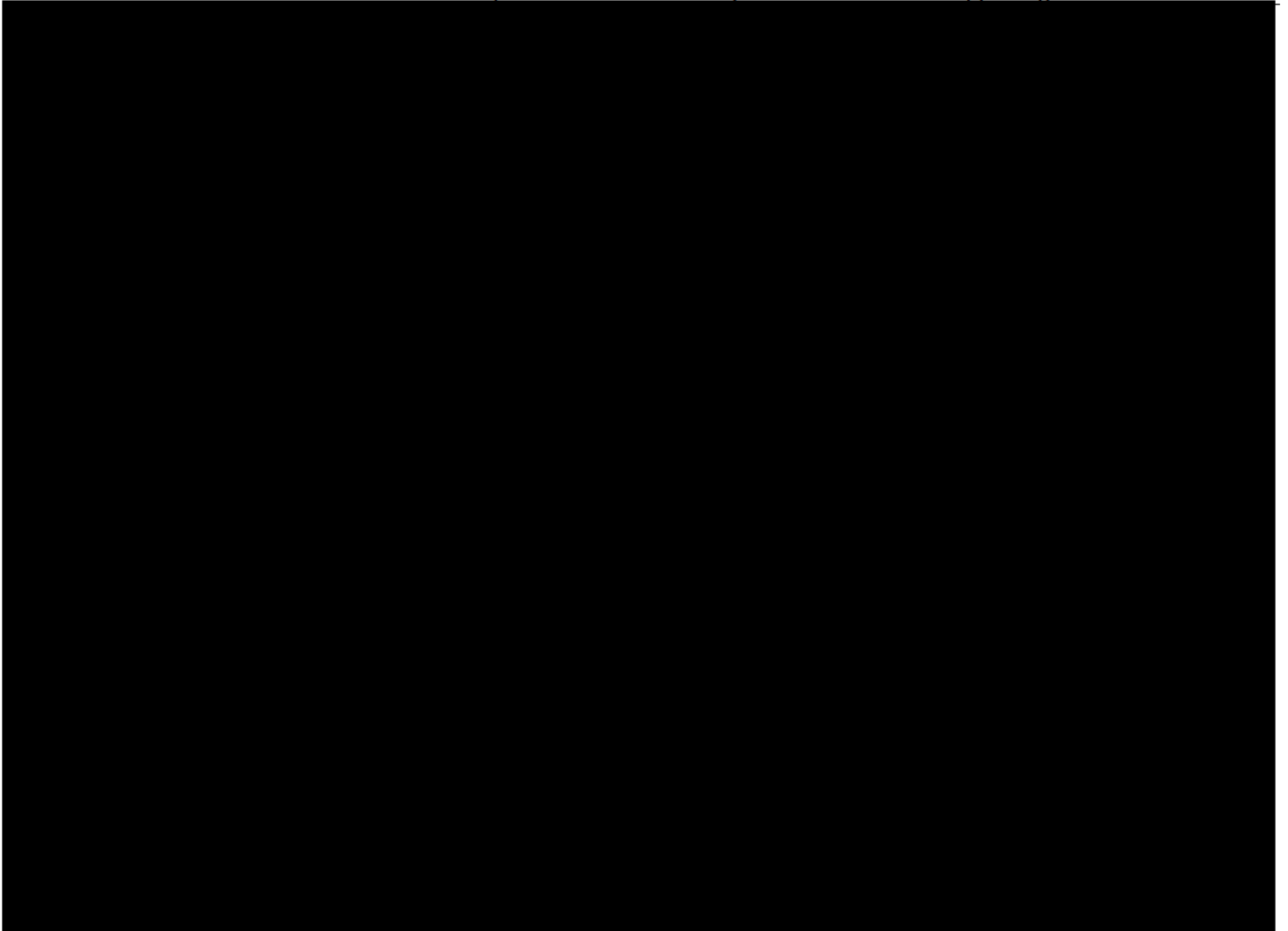
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My concern is that there was a significant level predestination thinking that resulted in Regulation 19 Green Belt Policy S7 being significantly different from the Green Belt policy that was presented by Medway Council at Regulation 18.

This predestination was the result of pressure from the large volume housing developers, Gravesham Council and Medway Council members.



5086

Comment

Respondent: Mrs Jennifer Price

Summary:

I object to the proposed removal of Chapter Farm (southern Parcel 1) from the Green Belt because it is inconsistent with Green Belt policy and unsupported by exceptional circumstances. The site plays an important role in preventing urban sprawl and maintaining separation between Gravesham and the Medway Towns. Its release would weaken the remaining Green Belt, increase pressure for further development, worsen congestion on the Wainscott Bypass, increase flood risk, result in the loss of productive farmland, and harm the rural character, amenity, and wellbeing of nearby residents, including those in Strood.

Full text:

Formal Representation Form / Appeal Submission

Matter: Objection to the De-designation of Green Belt Land at Chapter Farm (Part of Parcel 1)

Relevant Policies: Gravesham Local Plan Policy LP6 / Medway Local Plan Policy SA6

1. Introduction and Core Ground for Objection

I strongly object to the proposed removal of the southern section of Parcel 1 (Chapter Farm) from the Metropolitan Green Belt. The council's conclusion that this land has a "lower capability to resist sprawl" is deeply flawed. The allocation fails the national tests of soundness because it is not justified by the evidence base and is inconsistent with national policy set out in the National Planning Policy Framework (NPPF).

2. Flawed Separation of Parcel 1 (Contradiction of Purpose 1 & 2)

* The Error: The Gravesham Green Belt Study acknowledges that Parcel 1 makes a "Significant Contribution" to checking unrestricted urban sprawl (Purpose 1) and a "Contribution" to preventing neighbouring towns from merging (Purpose 2).

* The Argument: It is planning nonsense to score a strategic parcel highly for preventing the coalescence of Gravesend and the Medway Towns, only to slice off its most vulnerable edge. Developing Chapter Farm removes the critical physical buffer between Strood and Gravesham. Once this edge is breached, the integrity of the remaining Green Belt in Parcel (prime farm land) is permanently compromised, accelerating the exact urban sprawl the policy is designed to prevent.

3. Mischaracterisation of "Urbanising Features" (Purpose 3)

* The Error: The council justifies the release by citing "urbanising features" such as the Blaw Knox Sports Ground, existing farm buildings, and proximity to the A226/A289.

* The Argument: These features do not constitute "grey belt" or urban sprawl. The sports ground is an open-air recreational facility, which is a completely appropriate and compatible use within the Green Belt. Furthermore, heavy road infrastructure like the A289 Wainscott Bypass should act as a hard, permanent boundary to stop urban expansion, not as an excuse to cross it and swallow up active, productive agricultural fields.

4. Total Absence of "Exceptional Circumstances"

* The Error: Releasing Green Belt land requires "exceptional circumstances" to be fully demonstrated.

* The Argument: Meeting standard local housing targets or relying on a cross-border "Duty to Co-operate" agreement does not legally meet the high threshold of exceptional circumstances. The council has failed to comprehensively demonstrate that all alternative brownfield sites and non-Green Belt urban opportunities across both boroughs have been fully exhausted before sacrificing this high-grade agricultural land.

In addition, as a resident of Strood, I will be directly affected by this cross-border development proposal.

The Medway Green Belt Review states that Gravesham Borough Council has indicated its intention to release this land from the Green Belt. However, the fact that neighbouring land may be released is not, in itself, a sound justification for the loss of valuable agricultural land. Furthermore, this approach creates pressure for the subsequent release of Green Belt land on the Strood side, undermining the long-term integrity of the Green Belt designation.

The local highway network is already operating under significant strain. The Wainscott Bypass experiences severe congestion for much of the day, with only limited periods of free-flowing traffic during the late morning and late evening. Additional development would inevitably place further pressure on an already constrained transport network.

The farmland to the west of Strood is also susceptible to surface water flooding due to its topography, with water naturally flowing downhill towards existing residential properties, including those around the Bungalows area. Development of this land could exacerbate existing drainage and flood-risk concerns.

Finally, the impact on the existing community must be given significant weight. Many residents in this part of Strood are older and retired, having chosen to live in a relatively peaceful rural environment. The potential effects of large-scale development, including increased noise, air pollution, loss of amenity, and impacts on residents' wellbeing and mental health, should be carefully considered as part of the assessment process.

Attachments: None

5093

Comment

Respondent: Mrs Elizabeth Turpin**Summary:**

There is limited evidence that exceptional circumstances exist. There is a requirement to use as much suitable brownfield land before releasing Green Belt but this paper only states there was not sufficient without evidencing what brownfield sites were considered and how urban regeneration options were exhausted. The topic paper relies heavily on separate evidence. there are sustainability claims for Strood west again without the evidence regarding school and healthcare capacity, infrastructure delivery and the impact on environmental issues.

Full text:

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Attachments: None

5095

Comment

Respondent: Mrs Lindsey Morgan**Summary:**

B22.4 Green Belt Exceptional Circumstances Paper:

I do not agree that this paper effectively justifies the exceptional circumstances for green belt release.

No public consultation which included ability to shape options on the green belt review.

No evidence of independent scrutiny of the Green Belt Review

4.2 findings for parcels 2,3,4 are in contradiction to the GBR of 2018, despite no material changes to the land use

Parcel 4 was subject to a planning appeal in 2019 in which the Secretary of State planning inspector identified this land as making a significant contribution to purpose of Green Belt.

Full text:

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Attachments: None

5096

Comment

Respondent: Mr Mark Batchelor**Summary:**

1. No Greenbelt assessment has been undertaken.

2. Co-operation between Medway and Gravesham is based on NPPF 2024. Medway Plan will need to meet the criteria of NPPF 2024, but Gravesham could be subject to the Draft NPPF 2025, if published before Gravesham submit for review. If so the criteria for releasing Green Belt and the preference for building Sustainable Housing are different. Thus there is no justification to allow Medway release as Gravesham will need to redraft their Local Plan.

3. Medway release of Greenbelt constitutes Urban Sprawl.

Full text:

1. No Greenbelt assessment has been undertaken.

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Attachments: None

Planning Policy Team
Medway Council
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ME4 4TR

Lorena Hatton
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[REDACTED]
[REDACTED]
ME2 [REDACTED]
06/07/2026

Subject: Follow-up Formal Objection – Proposed Removal of Land North of Brompton Farm Road from the Green Belt

Dear Planning Policy Team,

I am submitting a formal challenge to the soundness, justification, and legal compliance of Medway Council's proposed Local Plan, specifically regarding **Strategic Allocation SA6 (Land West of Strood)** and the accompanying Green Belt Note (Document Ref: MLP/ED7, May 2026).

The Council's response to the Inspectors' initial queries does not defend the plan; rather, it exposes fatal methodological flaws, procedural shortcuts, and explicit admissions of plan unsoundness under the National Planning Policy Framework (NPPF). I request that the following four irreconcilable failures be brought directly to the attention of the Inspectorate:

1. Fatal Cross-Boundary Dependency and Lack of Independent "Exceptional Circumstances"

Under the NPPF, Medway Council must demonstrate objective, localized "Exceptional Circumstances" to justify releasing Green Belt land. Instead, in paragraph 23, the Council explicitly concedes:

"The Council does not believe that there would be exceptional circumstances to justify the release of land to the west of Strood if the release of Green Belt land in the adjoining part of Gravesham did not happen."

By tying the legal validity of allocation SA6 entirely to a separate, unadopted Local Plan under a different local authority (Gravesham BC), Medway has failed to produce an independent, legally robust case. If Gravesham's plan is delayed, altered, or found unsound, Medway's allocation automatically fails by its own admission. This renders Policy SA6 highly speculative and fundamentally **unsound because it is ineffective**.

2. Procedural Inadequacy: "Tracked Changes"

The Council attempts to reassure Inspectors of external verification by citing an independent critique. However, the text reveals an alarming lack of rigorous scrutiny:

“An independent critique of the draft of Medway’s Green Belt Review 2025 (ref: B8) was undertaken by consultants on the 6th of June 2025 and provided as comments in tracking... given consultants limited availability and the timing of the programme...”

A major structural alteration to protected Green Belt cannot legally or logically be validated by mere "comments in tracking" completed in a **single day** (6 June 2025) due to administrative haste. The Council chose to bypass comprehensive external commissions (such as those discussed with Arup and LUC in April/May 2025) solely to meet a self-imposed summer deadline, compromising the required objectivity of the evidence base.

3. Deliberate, Planned Degradation of Residual Green Belt

The Council’s justification relies on a predatory, self-fulfilling planning loop. They admit that developing this area reduces Medway’s remaining Green Belt width to a highly fragile **227 metres** (leaving a mere 16% remnant), explicitly stating:

“This narrow area of land would not be able to make a strong contribution to the purposes of the Green Belt.”

The Council is using the projected degradation of the land as an excuse to systematically abandon it. Rather than seeking to preserve the permanence of the Green Belt as instructed by national policy, Medway is actively engineering its collapse to justify sprawling, cross-border urban extension.

4. Severe Environmental and Infrastructure Contradictions

The Council explicitly notes that the Transport Assessment for the **Lower Thames Crossing** identifies severe gridlock, air pollution, and noise pollution, stating: *“this was one reason why growth in the Medway Valley needed to be limited.”* It is entirely contradictory and unjustified to then promote a massive strategic development (SA6) on the immediate periphery of Strood, designed to dump significant vehicular traffic directly onto the A226, M2, and A289 networks. The Council is knowingly placing a vulnerable new community into an area of acknowledged, severe environmental and infrastructural strain.

For these reasons, the exceptional circumstances claimed under the 2024 National Planning Policy Framework (NPPF) are deeply flawed, self-referential, and fail to justify the permanent destruction of this green space.

I request that these points be formally noted and forwarded to the relevant planning inspectorate or decision-making body handling the local development frameworks. Please confirm receipt of this objection and advise on the next steps for formal representation.

Yours sincerely,

Lorena Hatton

5099

Comment

Respondent: Mrs Lorena Hatton**Summary:**

See attached

Full text:

See page above

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan, B22.5 Housing Delivery Topic Paper

5092

Comment

Respondent: Mrs Elizabeth Turpin**Summary:**

There is a discrepancy between the reported housing need and housing delivery over the last five years. This cumulative pattern of under delivery raises concerns about future delivery assumptions within this topic paper. Especially as developers are the ones in control and will only build when, understandably, a profit can be made.

Full text:

There is a discrepancy between the reported housing need and housing delivery over the last five years. This cumulative pattern of under delivery raises concerns about future delivery assumptions within this topic paper. Especially as developers are the ones in control and will only build when, understandably, a profit can be made.

Attachments: None

5097

Comment

Respondent: Mr Nicholas DOWLING**Summary:**

Our Representation states that our position is that the method of assessing the Assessment plots 1, 2 and three is neither rigorous or robust and does not adequately assess the status of the sites in line with the NPPF 2024 or The Green Belt PPG and the Green belt assessment methodology outlined by Government.

Our representation undertakes a Green Belt assessment of the proposed sites and finds that it fails at the first test when measured against the Government methodology within the PPG.

Our conclusion is that the proposed release of these sites from Green Belt would not be appropriate.

Full text:

Holbrook Griffith Developments Limited Representations on Medway Council Submission Document Regulation 22, Green Belt Exceptional Circumstances Topic Paper

CRITICAL REVIEW OF THE GREEN BELT EXCEPTIONAL CIRCUMSTANCES PAPER

1. These representations are submitted in respect to the above paper and make critical review of the submitted topic paper in general and specifically in respect of the following sites

- a. Assessment area 1: Rochester Football Club
- b. Assessment area 2: Land North of Rede Court Road
- c. Assessment area 3: Brompton Farm Road

2. The three sites identified above form part of the much larger proposed cross boundary development which is proposed in conjunction with Gravesham Borough Council (GBC) which incorporates land which falls within the boundary of GBC, known as Chapter Farm and land West of Strood in Medway City Council (MCC) both of which are included within the respective regulation 19 submissions.

3. The overall site Land West of Strood is proposed for a significant urban development of up to 4,000 homes, employment two primary schools and a new secondary school.

4. Given the cross border joint promotion of land West of Strood it is critical that the parcels outlined above are assessed as part of the larger development proposal.

5. However, it is noted that the topic paper in so far as it has assessed the plots above, has only done so within the boundaries of Medway Council

6. It is our position that by omitting the proposals for the Green Belt plots, within the boundaries of GBC which are proposed for development within the draft regulation 19 submission, that any assessment undertaken by MC is at best misleading at worst does not accurately assess the impact of Assessment areas 1, 2 and 3 in terms of their cumulative impact on the Green Belt.

7. With reference to section 4 of the paper, it is noted that the methodology explains in rudimentary terms the process by

7. With reference to section 4 of the paper, it is noted that the methodology explains in rudimentary terms the process by which the sites within the topic paper were assessed, no evidence is submitted as to the form of the assessment template, the criteria used to formulate the template or indeed the results of the assessment carried out on a plot by plot basis.
8. Lacking this key data and analysis it is impossible, we would suggest, for the inspector to form an informed decision as to the robustness of the proposals with regard to the Land West of Stood proposed by Medway council.
9. We note a summary of the findings is listed under section 4.2. Notwithstanding, without the provision of the data and analysis of the assessment the findings are unsupported
10. As such we do need accept that this evidence is either rigorous or robust

GREY BELT ASSESSMENT

a. Introduction

1. This Grey Belt Assessment has been prepared by Holbrook Griffith Development Ltd in respect of the Green Belt Exceptional Circumstances Topic Paper submitted to PINS by MC in support of their Regulation 19 submission.
2. The assessment is undertaken against the National Planning Policy Framework (December 2024) and the Government's Green Belt Planning Practice Guidance (February 2025). It addresses two matters:
 - whether Assessment sites 1, 2 and 3 in conjunction with Chapter farm (development site Land West of Stood) when assessed against the Government's Grey Belt assessment criteria fall within the definition of Grey Belt set out in the Glossary at Annex 2 of the NPPF; and
 - whether the Land west of Stood development Site would meet the test for appropriate development set out at paragraph 155 and 110 of the NPPF.
3. This assessment is made on a without prejudice basis. All parts of the site lay wholly within the Metropolitan Green Belt, our primary position, set out in the accompanying representations, is that the Site should not be allocated for residential-led development through the plan-making process. This assessment demonstrates that, in any event, the Site cannot properly be classed as Grey Belt, cannot be classed as sustainably located and that its development would constitute inappropriate development in the Green Belt.

b. The Site

4. The Site in its entirety comprises of some 150.27 hectares of land to the east and west of the Gravesend Road (A226). The site lays directly adjacent to and conjoins with the western limit of the Medway conurbation which incorporates the towns of Stood, Rochester, Chatham Gillingham and Rainham. With a net developable area @50% giving an area of 75.135 hectares as recorded in the GBC and MC Council's SHLAA (2025). The site is promoted as a cross boundary development providing 2,922 homes.
5. It is broadly greenfield in nature with some agricultural buildings within it. Its boundaries are defined by a combination of hedgerows, mature trees, the existing built-up edge of Strood, and the local road network, including Gravesend Road, Hasted Road and Watling Road.
6. Higham Railway Station, on the North Kent Line, lies 3.38 Kilometres to the north of the site and Strood Railway Station on the North Kent Line, lies 2.5 Kilometres to the south and east of the site. The site is not currently well served with a bus service having only one bus service (Arriva 190) with two buses per hour and one bus stop on the edge eastern edge of the site on the Rochester Road.
7. The site lies within 1 minute car drive of junction 1 of the M2 and 1 minute to the access junction onto the Hasted Road which joins directly with the M2 and the Medway Tunnel which links the site directly to Gillingham and Chatham.

c. The Grey Belt Definition

7. The definition of Grey Belt in the NPPF Glossary (Annex 2) is:
 "Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."
8. The Site does not contain substantial elements of previously developed land. It therefore falls to be assessed under the second limb of the definition, namely whether it is "any other land that ... does not strongly contribute to any of purposes (a), (b), or (d)" of paragraph 143.
9. The Site does not contain, and is not, land within or comprising any of the areas or assets listed at footnote 7 of the NPPF (other than Green Belt). There is no Site of Special Scientific Interest, National Landscape, irreplaceable habitat, scheduled monument, registered park or garden, designated heritage asset, or land at risk of flooding within the Site. The site adjoins a number of Listed Buildings, but it is considered that the site can be developed without significantly impacting the setting of the Listed Building. The agricultural land classification of the Site is not a footnote 7 constraint. Accordingly, the footnote 7 exclusion does not apply.
10. The Site's contribution to Green Belt purposes (a), (b) and (d) is assessed below. These purposes are:
 - (a) to check the unrestricted sprawl of large built-up areas;
 - (b) to prevent neighbouring towns from merging into one another; and
 - (d) to preserve the setting and special character of historic towns.
 Purpose (a): to check the unrestricted sprawl of large built-up areas
11. This purpose is concerned with the sprawl of large built-up areas. The Sites adjoin and directly touch the existing Medway Conurbation at the western edges of Stood. The MC local plan whilst it does not have a defined settlement hierarchy refers to urban and rural developments. The Medway conurbation comprising of Strood Rochester, Chatham, Gillingham and Rainham covers 86.76 Km² geographically and has a population of 292,000 it therefore clearly constitutes a Large built up area. The Medway conurbation has historically enveloped smaller village settlements such as Borstal, Great Delce and Finsbury incorporating them through the action of Urban sprawl transforming them into to districts of the Medway Conurbation. Given that assessment sites represent 75% of the Green Belt within MCC the given function of Assessment sites 1,2 and 3 to prevent Urban Sprawl sites we would propose they completely fulfil purpose a) of Green Belt policy i.e. to prevent the urban sprawl of large built up areas. We would further argue that given the

Medway Conurbation has historically grown through Urban sprawl this scenario was exactly the reason Green Belt policy was originally formulated to prevent and therefore carries great weight.

12. Assessment sites 1, 2 and 3 are generally free from development and open in nature. Assessment site 1 adjoins the Medway Conurbation on two sides and has no physical feature which could constrain development on the other two sides. Assessment site 2 adjoins the Medway Conurbation to the south and the Rochester Road which constrains further development to the east; however, it has no physical feature which would constrain development on the north and west boundaries of the site. Assessment site 3 is majority undeveloped with the exception of three small rural properties to the northwest on Dillywood Lane. It directly adjoins the Medway Conurbation to the south. It is constrained by the Gravesend Road to the east, partially constrained to the northeast by Hasted Road and unconstrained to the north and east. When viewed together the three assessment sites if released from Green Belt would result in an incongruous bent finger of development east of Strood. The indefensible boundaries of the three assessment sites would lead to the pressure to develop adjacent Green Belt plots with GBC, as evidenced by the Chapter Farm proposals promoted by GBC in their draft regulation 19 submission.

13. Overall, our position is that Assessment sites 1, 2 and 3 when measured against the Green Belt assessment grid within the Green Belt PPG individually and collectively make a strong contribution to purpose a) of the green belt and therefore cannot be redefined as Grey Belt.

14. However, assessment sites 1, 2 and 3 form part of a larger cross border proposal for development. When viewed on this basis the site constitutes a major expansion of the Medway Conurbation. The proposed development of Land West of Strood (MC) and Chapter Farm (GBC) covers 150 Ha of land which represents a significant expansion of the existing 86.76 KM2 built up area of the Medway Conurbation. It follows that development of the Land West of Strood and Chapter Farm would result in significant urban sprawl of a large built-up area; the Site overall therefore strongly contributes to purpose (a) on that basis alone.

15. However, the assessment sites being a constituent part of a wider cross border development raises key questions as to the assessment of the function of the sites within Green Belt. Whilst the Land West of Strood (within Medway Council) and Chapter Farm (Gravesham Borough Council) are promoted as a unified master plan each of the proposed allocations will be subject to separate and distinct public enquiries. It is therefore important to assess the various scenarios which may arise.

a) Scenario 1: Chapter Farm (GBC) released from Green Belt and allocated for development

In this hypothesis approximately 1,800 homes would be allocated in a 100 Ha finger shaped development adjacent to the Rede Court area of Strood enveloping Three Crutches and Dillywood Lane. In this scenario assessment sites 1, 2 and 3 play a key role in preventing urban sprawl both out of and back into the Medway Conurbation thereby preventing new proposed development within GBC from merging with the existing development of Strood adjacent to the Brompton Park District of Strood.

b) Scenario 2: Chapter Farm (GBC) and Land West of Strood (MC) released from Green Belt and allocated for development

Refer to Para 11, Para 12, Para 13 and Para 14

c) Scenario 3: Land West of Strood (MC) released from Green Belt and allocated for development

Refer to Para 11 and Para 14

16. Without prejudice to that conclusion, and even if the matter were approached in terms of containment and pattern of development, the same conclusion is reached. The Green Belt PPG describes sprawl as "an incongruous pattern of development (such as an extended 'finger' of development into the Green Belt)." The three Assessment sites 1, 2 and 3 as described in paragraph 12 are largely unconstrained by physical features and results in an uncourageous form of development sticking out of Medway by in the form of a bent finger.

17. The A289 to the west of the proposed allocation is in itself a distinct and urbanising element in the landscape laying closely adjacent to the existing settlement boundaries of Higham to the west (30 seconds travel by car) and the entrance to the proposed allocation to the east (1 minute by car). It is our position therefore that the significant development proposed would have the following effects

a) Significantly urbanise the eastern boundary of the Green Belt

b) Create 4 plots on the eastern edge of the Green Belt between the eastern settlement boundary of Higham and the A289 which would come under pressure to be released from Green Belt as they no longer effectively function as Green Belt when looked at as a whole.

Purpose (b): to prevent neighbouring towns merging into one another

14. Paragraph 005 of the Green Belt PPG confirms that this purpose relates specifically to the merging of towns, and not to the merging of villages. However, it is silent on the coalescence of a village as a consequence of the urban sprawl of a town, thereby transforming the village into a suburb of that town (see paragraph 11 above)

15. In respect of the Assessment sites 1, 2 and 3 they clearly do not merge into an adjacent town.

16. In respect of the cross border development site, whilst GBC in their regulation 19 submission make the case that the prevention of merging of villages is not one of the purposes of green belt and can be discounted for the purposes of allocating Chapter Farm. Their assessment ignores the self-evident fact that expanding the Medway Conurbation west thereby incorporating Three Crutches and Dillywood lane into the largest built up area in Kent fails purpose a) of the five purposes of Green Belt.

17. Therefore, whilst the proposed development does not merge two towns it does via the process of urban sprawl envelope two villages, Three Crutches and Dillywood lane into the Medway conurbation thereby turning them into suburbs of a large built up area and therefore fails the Grey Belt test at the first hurdle.

Purpose (d): to preserve the setting and special character of historic towns

16. This purpose is concerned with the setting and special character of historic towns. Neither Higham nor Three Crutches are historic towns and whilst Rochester is a Historic Town Strood is not. Therefore, this criterion is not

applicable to the Grey Belt assessment.

Conclusion on the Grey Belt definition

18. Assessment sites 1 2 and 3 within Medway Local Authority Area viewed individually and collectively have a strong contribution to purpose a) of the five purposes of Green Belt and therefore fail at the first line of assessment for redefinition of Grey Belt. Whilst Assessment sites 1, 2 and 3 do not result in the merging of towns, purpose b) their release from Green belt would however result in a much larger cross boarder development which as currently proposed would coalesce with two existing villages thereby changing their status from village to suburbs of a large built up area Medway conurbation via the process of urban sprawl. Purpose d) does not apply in this case

Appropriate Development: Paragraph 155

19. Paragraph 155 of the NPPF provides that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:

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

20. Each criterion is considered in turn.

(a) Grey Belt land which would not fundamentally undermine the remaining Green Belt

21. The Site is not Grey Belt, as established above.

• The development of the Site would, therefore, fundamentally undermine the purposes of the remaining Green Belt taken together on that basis alone. Notwithstanding this, taking a broader view the PPG requires Green Belt Assessments to identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan. The Green Belt release in Medway involves 75% of the total Green Belt in the local authority area. We do not consider it is credible to claim that the loss of three quarters of the Green Belt would not fundamentally alter the purposes in this location.

Criterion (a) is not met

(b) Demonstrable unmet need

24. There is demonstrable unmet need for housing in Medway . The plan is required to make provision for XXXX homes over the period 2025 to 2042. Critically, the Council has itself concluded that this need cannot be met within the urban area and the settlements inset from the Green Belt, and that "the limited capacity to meet the development needs of the Borough in the urban area or settlements inset from the Green Belt represents exceptional circumstances necessary to justify the need to amend the Green Belt boundary."

25. There is a demonstrable unmet need for housing in Gravesham. The Plan is required to make provision for a minimum of 11,492 homes over the period 2025 to 2042. Critically, the Council has itself concluded that this need cannot be met within the urban area and the settlements inset from the Green Belt, and that "the limited capacity to meet the development needs of the Borough in the urban area or settlements inset from the Green Belt represents exceptional circumstances necessary to justify the need to amend the Green Belt boundary."

26. The Council has therefore expressly accepted, as the foundation of its entire spatial strategy, that there is an unmet need which can only be met through the release of Green Belt land. That is a clear and demonstrable unmet need for the type of development proposed. The only question is which Green Belt land should be released to meet it, which is the subject of the accompanying representations. Criterion (b) is met.

(c) Sustainable location

26. Paragraph 110 states that significant development should be located at locations that are sustainable in that they are able to offer a genuine range of transport modes in order to reduce congestion and emissions and improve health. The most efficient form of transport in terms of reducing emissions and congestion are in order of preference 1) Active Transport (walking and cycling) 2) Rail public Transport 3) Electric Bus Transport 4) diesel bus transport.

27. The Site overall is not in a sustainable location. It is over 3KM from Higham Railway Station on the North Kent Line, and 2.5 KM from Strood Railway Station also on the North Kent Line which provides direct services to London Charing Cross, Strood and the Medway towns, together with onward connections including high speed services to St Pancras International. There are other more sustainably located viable development sites adjacent to these stations which are better suited to the location of significant development.

28. The proposed site being located between Junction 1 of the A2/M2 and the access to the A289 is a naturally car centric development providing easy access to the National and regional strategic road network. This fails to meet the requirements of paragraph 155 or paragraph 110 in that it would not reduce emissions or congestion. Criterion c) is not met

(d) The Golden Rules

30. These do not apply as the site is neither Green Belt or appropriately located

e. Summary and Conclusion

31. The Site overall is land within the Green Belt which contains no footnote 7 designation and which does strongly contribute to Green Belt purposes (a), It is therefore not Grey Belt within the meaning of the NPPF Glossary.

32. The development of the Site would not satisfy each limb of the paragraph 155 test: it would not utilise Grey Belt land without fundamentally undermining the remaining Green Belt; it would meet a demonstrable unmet need that the Council itself has accepted requires Green Belt release; it is not in a sustainable location as defined by paragraph 110.

33. It follows that the development of the Site would constitute inappropriate development in the Green Belt and would give rise to Green Belt harm.

34. This conclusion is only reinforced by the direction of emerging national policy. The draft revised NPPF, published for consultation on 16 December 2025 and anticipated to be adopted during the currency of this Plan's examination.

Summary Table

Grey Belt definition Assessment

Does the Site comprise previously developed land? No

Does the Site contain footnote 7 designations (other than Green Belt)? No

Purpose (a) – sprawl of large built-up areas Contributes strongly and produces and incongruous finger of development

Purpose (b) – merging of neighbouring towns Does not contribute (However, refer to paragraphs 11,12, 13, 14)

Purpose (d) – setting/character of historic towns N/A

Conclusion The Site is not Grey Belt

Paragraph 155 test Assessment

(a) Grey Belt; would not fundamentally undermine remaining Green Belt Not Met

(b) Demonstrable unmet need Met (Council accepts Green Belt release required)

(c) Sustainable location (paras 110, 115) Not Met (is located between two significant junctions onto the strategic road network and would encourage the use of private vehicles thereby increasing emissions and congestion)

(d) Golden Rules (paras 156–157) N/A

Conclusion Development would be inappropriate development in the Green Belt

Attachments: None

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan, B22.7 Gypsy and Traveller Accommodation Topic Paper

5089

Comment

Respondent: Mrs Elizabeth Turpin

Summary:

Heavy reliance on a criteria based policy and no evidence that identified need can actually be met. Little analysis of why the call for sites failed.

Full text:

Heavy reliance on a criteria based policy and no evidence that identified need can actually be met. Little analysis of why the call for sites failed.

Attachments: None

New documents, Playing Pitch Strategy - Summary

5087

Comment

Respondent: Sports England

Summary:

Sport England is working on this project with Medway and number of sports governing bodies and while it is not yet complete we believe the final document will be very sound and robust.

Full text:

Sport England is working on this project with Medway and number of sports governing bodies and while it is not yet complete we believe the final document will be very sound and robust.

Attachments: None

New documents, Facilities Planning Model - Summary

5088

Comment

Respondent: Sports England

Summary:

■ Sport England feels the FPM should not have been publicly published due the possible misinterpretation

Full text:

Sport England is concerned about the public publication of this document. This was done to inform the built facilities strategy and not as a stand-alone document, which can be mis-interpreted by people who do not understand its purpose or its methodology behind the content.

The Facilities Planning Model is a computer model that helps to assess the strategic provision of community sports facilities across a defined geographic area.

The model is intended for use by local authority partners (or other strategic planning bodies) to help inform strategic planning and assessments of need for community sports facilities across their areas.

In its simplest form, the FPM looks to assess whether the capacity of existing facilities are capable of meeting local demand for a particular sport. It covers sports halls, swimming pools and artificial grass pitches, and has also been used for indoor bowls centres.

The model has been developed to help local authorities:

Assess the requirements for different types of community sports facilities on a local, regional or national scale

Determine an adequate level of sports facility provision to meet their local needs

Test 'what if' scenarios in provision and changes in demand, including testing the impact of opening, relocating and closing facilities and the impact major population changes would have on the needs of the sports facilities.

The model can be used to help inform local authorities, when undertaking an assessment of need in respect of indoor sports facilities in line with Sport England's assessing needs guidance.

It is important to note that when using the model to undertake strategic assessments, the FPM outputs should not be used in isolation and always be part of an overall assessment, which should also include local context, knowledge and data.

Attachments: None

From: [REDACTED]
To: [policy planning](#)
Subject: Local plan where do I find information regarding a new/additional Hospital for Medway
Date: 06 June 2026 10:30:48

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi,

I have received your email regarding the proposed local plan.

Where do I find information regarding expansion of Medway Hospital facilities - not just 'hubs' or similar.

With the ever increasing population due to the building of accommodations etc being carried out throughout the Medway area the Medway Maritime Hospital is woefully under sized /equipped to cope with the current population let alone the planned for increase in population.

In addition the available car parking at the Hospital is totally inadequate & it can take up to an hour sometimes to park a vehicle - including for blue badge holders. The parking situation is exacerbated for clinic attendees by the current visiting hours for in patients.

Whilst VERY flexible visiting hours may seem to be good for the recovery of patients my personal experience of such flexible Visiting hours was VERY uncomfortable - unless strictly controlled.

My experience was in a 4 bed ward -post 3 days in HDU (High Dependency Unit)- the patient in the bed opposite mine on a daily basis -from 9.00amish until late afternoon 4 people,

2 young children, in push chairs ,meals being brought in from McDonalds one visitor & patient going outside regularly for a cigarette, smelly dirty nappies being placed in the waste bin at the end of my bed along with the food remnants/packages.

First day out of HDU that regime was not conducive to a quiet recovery from serious illness.

Admittedly that was in 2019 & maybe things have changed?!

[REDACTED] thank you NHS-my husband has many appointments to attend & so we have personal experience of the issues regarding parking at the Hospital. As you will appreciate for blue badge holders & some others, parking in nearby streets is not physically an option on mobility grounds.

The staff at Medway Maritime are already working in very difficult circumstances and I am positive that if any survey was undertaken of residents of Medway, the Hospital would come at the top of the list for areas of improvement in size of Hospital and access required

My husband & I also have to attend [REDACTED] Maidstone Hospital has improved its Hospital & parking by expanding into a local smallish business area in Hermitage Lane, having designated buildings where for instance diagnosis, X-ray, Scanning, Blood tests etc can be undertaken. These facilities are separate from 'converting' Doctor's Surgeries to make available such facilities outside of Medway Hospital but are in fact, in our opinion, a far superior option for patients & staff alike.

Have you given consideration to building something similar in the proximity of the Great Lines which is in close proximity to the existing Hospital?

Perhaps when canvassing residents for potential Travellers sites, canvassing for overspill Hospital Facilities could also be sought.

We would be pleased to be advised the current thinking of the Planning Department in this regard.

Kind regards, Jean & David Winter
ME1 [REDACTED]

Formal Representation Form / Appeal Submission

Matter: Objection to the De-designation of Green Belt Land at Chapter Farm (Part of Parcel 1)

Relevant Policies: Gravesham Local Plan Policy LP6 / Medway Local Plan Policy SA6

1. Introduction and Core Ground for Objection

I strongly object to the proposed removal of the southern section of **Parcel 1 (Chapter Farm)** from the Metropolitan Green Belt. The council's conclusion that this land has a "lower capability to resist sprawl" is deeply flawed. The allocation fails the national tests of soundness because it is **not justified** by the evidence base and is **inconsistent with national policy** set out in the National Planning Policy Framework (NPPF).

2. Flawed Separation of Parcel 1 (Contradiction of Purpose 1 & 2)

- **The Error:** The Gravesham Green Belt Study acknowledges that Parcel 1 makes a "**Significant Contribution**" to checking unrestricted urban sprawl (Purpose 1) and a "**Contribution**" to preventing neighbouring towns from merging (Purpose 2).
- **The Argument:** It is planning nonsense to score a strategic parcel highly for preventing the coalescence of Gravesend and the Medway Towns, only to slice off its most vulnerable edge. Developing Chapter Farm removes the critical physical buffer between Strood and Gravesham. Once this edge is breached, the integrity of the remaining Green Belt in Parcel (prime farm land) is permanently compromised, accelerating the exact urban sprawl the policy is designed to prevent.

3. Mischaracterisation of "Urbanising Features" (Purpose 3)

- **The Error:** The council justifies the release by citing "urbanising features" such as the Blaw Knox Sports Ground, existing farm buildings, and proximity to the A226/A289.
- **The Argument:** These features do not constitute "grey belt" or urban sprawl. The sports ground is an open-air recreational facility, which is a completely appropriate and compatible use within the Green Belt. Furthermore, heavy road infrastructure like the A289 Wainscott Bypass should act as a **hard, permanent boundary** to stop urban expansion, not as an excuse to cross it and swallow up active, productive agricultural fields.

4. Total Absence of "Exceptional Circumstances"

- **The Error:** Releasing Green Belt land requires "exceptional circumstances" to be fully demonstrated.
- **The Argument:** Meeting standard local housing targets or relying on a cross-border "Duty to Co-operate" agreement does not legally meet the high threshold of exceptional circumstances. The council has failed to comprehensively demonstrate that all alternative brownfield sites and non-Green Belt urban opportunities across both boroughs have been fully exhausted before sacrificing this high-grade agricultural land.

In addition, as a resident of Strood, I will be directly affected by this cross-border development proposal.

The Medway Green Belt Review states that Gravesham Borough Council has indicated its intention to release this land from the Green Belt. However, the fact that neighbouring land may be released is not, in itself, a sound justification for the loss of valuable agricultural land. Furthermore, this approach creates pressure for the subsequent release of Green Belt land on the Strood side, undermining the long-term integrity of the Green Belt designation.

The local highway network is already operating under significant strain. The Wainscott Bypass experiences severe congestion for much of the day, with only limited periods of free-flowing traffic during the late morning and late evening. Additional development would inevitably place further pressure on an already constrained transport network.

The farmland to the west of Strood is also susceptible to surface water flooding due to its topography, with water naturally flowing downhill towards existing residential properties, including those around the Bungalows area. Development of this land could exacerbate existing drainage and flood-risk concerns.

Finally, the impact on the existing community must be given significant weight. Many residents in this part of Strood are older and retired, having chosen to live in a relatively peaceful rural environment. The potential effects of large-scale development, including increased noise, air pollution, loss of amenity, and impacts on residents' wellbeing and mental health, should be carefully considered as part of the assessment process.

Medway Local Plan 2041 supporting evidence documents (additional consultation)

These are the comments of CPRE Kent with respect to:

- B22.1 - Site Selection Topic Paper
- B22.5 - Housing Delivery Topic Paper

Being documents that were unavailable in June 2025 (Regulation 19), when the Council invited comments on its Local Plan, but were published in the Examination Library as part of the Submission of the Plan in December 2025 (Regulation 22).

Introduction

You will recall that CPRE Kent's key objection to the Regulation 19 version of the Council's draft Local Plan related to loss of green belt and best and most versatile agricultural land not being properly evidenced.

We asked that development on brownfield land be prioritised and that the Council undertake a targeted call for brownfield sites – as others in the County have done (Canterbury City Council, Folkestone & Hythe, Sevenoaks, Thanet and Tonbridge & Malling Borough Council).

The publication of additional evidence to support the local plan through Examination, namely the Site Selection Topic Paper and the Housing Delivery Topic Paper have seemingly confirmed the entrenched position the Council has in terms of its greenfield development strategy.

Consciously or subconsciously, the Council is placing too much influence in the hands of developers (through its call for sites exercise), who naturally prioritise their financial interests over the genuine needs of communities and the concept of sustainable development.

This is an approach that inevitably leads to a strategy heavily weighted towards greenfield sites. The reason for this is that greenfield sites are almost always promoted by developers, as it is these sites which give the greatest profit.

As we've previously stated a far more effective approach would have been for the Council to have taken firm ownership of the direction of its spatial strategy and then to have proactively identified potential development sites to deliver that strategy.

This approach (via a brownfield call for sites) would naturally lead to a true 'brownfield first' spatial strategy, spearheading the regeneration and improvement of the Council's urban areas.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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Registered charity (number 1092012), limited company registered in England (number 4335730)

Site Selection Topic Paper (B22.1)

Paragraph 2.3.8 of the recently published Site Selection Topic Paper explains that the Council's Interim Land Availability Assessment "sought further availability details for 109 sites, mainly town-centre locations identified from development briefs (some with concept plans), emerging neighbourhood plans, planning applications, and vacant/derelict land and buildings."

It then advises at paragraph 2.3.9 that these sites "were treated as unavailable" - despite them being subject to development briefs, emerging Neighbourhood Plans and planning applications.

In essence, they've been written off before any effort was made to seek to unlock them. This contradicts the comments at paragraph 4.2.3 of the Housing Delivery Topic Paper which say that the Council is "actively working" on bringing sites forward.

Housing Delivery Topic Paper (B22.5)

Paragraph 1.27 of the recently published Housing Delivery Topic Paper refers to "permitted development". An awkward choice of words when the intention is actually to refer to development that has been granted planning permission (and not to development for which a planning application isn't required).

In discussing the proposed stepped housing requirement at paragraph 3.1.2, the Council sets out how the housing requirement is supply-led. It then goes on to explain how the extent to which it can meet its need is guided by its Land Availability Assessment. As set out above the conclusions reached in this assessment are flawed by virtue of town centre sites being written off as not being available.

Paragraphs 3.2.4 and 4.2.2 of the Housing Delivery Topic Paper set out how, after the Regulation 19 period of public consultation, new information has emerged. This includes an ongoing review of the Brownfield Land Register.

While we welcome the principle of exploring brownfield options, this isn't a sound way of underpinning decisions around the Council's spatial strategy in that it's neither justified or effective.

Table 4 (under paragraph 4.2.2) lists 12 sites (with a potential 524 for homes) which are currently being reviewed by the Council. A targeted call for brownfield sites at the evidence gathering stage of local plan production could, potentially, have flagged up additional sites that could have been assessed.

We welcome the commitment the Council is giving at paragraph 4.2.3 to "actively working on bringing forward some of these sites for development through its regeneration activities."

It would be interesting to understand more about the nature of this work and to understand why our Regulation 18 comments weren't properly considered at the appropriate time, which would have meant these regeneration activities could have influenced the Council's spatial strategy in advance of its Regulation 19 consultation.

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: Medway Local Plan 2041 - Additional Consultation - IDP - Holding Objection from Chatham Maritime Trust
Date: 23 June 2026 11:25:17
Attachments: [image354538.png](#)
[image436368.png](#)
[Representations to Medway Local Plan_IDP_obo_CMT_230626.docx](#)
[Letter to Adam Bryan_Medway Council_OBO CMT_River Medway Strategy_January 2026.docx](#)
[Letter to D Harris - Medway Council - CMT - 180925.pdf](#)
[Laguna Science_River Medway Strategy_CMT 280126.docx](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir / Madam,

I write on behalf of the **Chatham Maritime Trust** ('the Trust') in relation to the Council's latest public consultation regarding the (B2) Infrastructure Delivery Plan (December 2025) which forms a key component of the evidence base supporting the draft Medway Local Plan 2041.

Please accept the representations as a **holding objection to the Infrastructure Delivery Plan ('IDP') and inter-alia to the draft Local Plan.**

The IDP is a very important component of the draft Local Plan, it is not just another document. The IDP sets out how the proposed major regeneration sites will be supported by infrastructure and what allowances towards existing infrastructure the major growth sites should make.

The IDP as drafted is completely silent regarding the Trust's land holdings and the vital marine infrastructure components that the Trust manages for the benefit of the wider local community, which are directly affected by the proposed growth sites.

The IDP together with the Council's River Medway Strategy do not reflect the vital role of the water-exchange system (the lock gates) between Basins 3 and 2 which is situated under Barrack Road which itself forms part of the draft allocated growth sites north of Gillingham. Furthermore, the IDP does not reflect the need to support the Water Sports Centre (also reliant on the water Basins and itself subject to S106 legal agreements between the Council and public bodies). These are serious omissions with very significant potential economic and environmental implications as set out in the evidence already provided to the Council from Carter Jonas and Laguna Science (attached). The environmental considerations, as discussed by Laguna Science, are particularly important in the context of the Plan being found 'sound'.

These matters and issues need to be acknowledged and addressed in the Local Plan and the supporting evidence base. These elements of established infrastructure are far too important to set aside and leave for consideration as part of a future planning application. They must be addressed and given appropriate consideration in the Local Plan and the supporting evidence base.

On this basis, our representations constitute a **holding objection.**

We look forward to the Council's response to the points we have raised.

Yours faithfully,

Philip Scott

Copied to the Local Plan programme officer.

Philip Scott
Partner

Carter Jonas

[REDACTED] | carterjonas.co.uk
70 Churchill Square, Kings Hill, West Malling, ME19 [REDACTED]



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Carter Jonas LLP

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Your ref:
Our ref: CMT –
Representation to Medway
Local Plan 2041 - Holding
Objection to Evidence Base
– B2 IDP.

23rd June 2026

BY EMAIL: planning.policy@medway.gov.uk

Dear Sir / Madam,

MEDWAY LOCAL PLAN 2041 SUPPORTING EVIDENCE DOCUMENTS CONSULTATION

B2 INFRASTRUCTURE DELIVERY PLAN (DECEMBER 2025) – HOLDING OBJECTION

I write on behalf of the Chatham Maritime Trust ('the Trust') in response to the Council's Infrastructure Delivery Plan ('IDP') which was published in December 2025 to support the new Medway Local Plan which has progressed to submission and is expected to be independently examined for soundness.

Background

The Council will be aware that the Trust, which is a significant landowner and local stakeholder which manages important marine resources and assets in Medway, has to date been very keen to support the Council's Local Plan and the regeneration proposals relating to the River Waterfront (Policy SA4) despite the Trust having concerns and misgivings regarding the policy void in the draft Local Plan policy relating to the Water Basins, the 'lock gates' and the Caisson, Penstocks and Culverts under Barrack Road, and the Water Sports Centre. In that regard, the Trust had taken the view that direct negotiation with Council Officers might address the Trust's concerns and misgivings.

However, correspondence dating back to September 2025 and a meeting with senior Officers in April this year has not resulted in the comfort that the Trust is reasonably seeking regarding the future of the water basins, the lock gates, and the Water Sports Centre. These blue infrastructure features are vital components of Chatham, not only in terms of their value to the areas heritage, tourism and employment value, but critically their importance to marine ecology. The water quality of the Basins (being a marine eco-system) should be safeguarded and nurtured.

Yet despite the vital attributes of these blue infrastructure components, the Council's Local Plan and the evidence base is silent on their role and their importance to the local area. In particular, draft Policy SA4 contains no lower or upper case policy relating to the need to conserve the water basins and the need for the regeneration proposals to preserve or make provision for the water-exchange system between the main locks, Basin 3 and Basin 2.

In this regard, the context is even more concerning to the Trust because the Council's 'River Medway Strategy' published last year included written statements that the lock gates "...will be permanently closed..." as part of the future regeneration proposals. This action, were it to happen, would cause very significant and demonstrable harm to the water quality of Basin 2 and to the marine environment. Written evidence in that regard was submitted to senior Council Officers from Laguna Science.

In short, any proposals to close the lock gate, or any proposals which do not explicitly require the future maintenance of the lock gates are likely to result in the water exchange system between the basins failing, and the water levels reducing and stagnating making the Basin unusable for water sports. Moreover, the stagnation of Basin 2 would result in potential harmful effects for marine wildlife.

Are the joint Local Plan Inspector's, appointed on behalf of the Secretary of State, aware of these potential outcomes? Do the jointly appointed Local Plan Inspector's even know about, or understand, the vital importance of the Caissons, Penstocks and Culverts under Barrack Road which forms part of the River Waterfront development sites north of Gillingham (Policy A4).

The Infrastructure Delivery Plan (IDP) (December 2025) in its published form exacerbates the Trust's growing concerns, and in that context the Council and the Local Plan Inspector's should consider this letter to constitute a formal holding objection to the document, and inter-alia to the Local Plan which the IDP supports and underpins.

The Infrastructure Delivery Plan

The Council acknowledges that the IDP is a "key part of the evidence base which informs the delivery of the Local Plan" (page 8). In this regard, the IDP is central to the delivery of the new Local Plan. The IDP matters and getting the IDP right should matter too.

The Trust makes the following comments and suggested amendments to the IDP as follows:

Executive Summary (Page 8)

The Council also says that the IDP, "...reflects the council's ambitions for Medway's residents, environment and economy." (page 8) yet the IDP is silent on the Water Basins and Water Sports Centre and the role of the basin lock gates which are themselves infrastructure which have direct implications for the local environment and the economy through their role in local tourism and employment.

Local Context (Page 9)

The Local Context section (page 9) provides a summary of the area and its core attributes in the context of infrastructure, yet it is silent on the history, role, and importance of the marinas and the ongoing cultural and economic role of the waterway the harbours and the marinas.

Engagement with Infrastructure and Service Providers (Page 11)

At 1.3.1 the IDP says, “Medway Council has carried out significant engagement with infrastructure providers in the production of this IDP and the process of producing the Local Plan.” whilst at 1.3.2 the document says, “...Further detailed engagement has been undertaken around strategic development areas and evidence base documents..”.

The Trust has been corresponding with senior Council Officers on a range matters and issues over recent years. Since September 2005 the Trust has been specifically corresponding with Officers on matters relating to the Water Basins, Water Sports Centre and lock gates in the context of the proposed regeneration of St Mary’s Island. To date, our various written correspondence has resulted in one meeting in April 2026, this meeting followed intervention from Council departmental leads to the Trust’s growing frustration regarding the lack of engagement regarding the Trust’s extensive land interests and following the publication of the Council’s River Medway Strategy.

In terms of the IDP, the Trust has not been approached by the Council and there has been no pre-publication engagement with the Trust regarding the contents of the IDP. This is possibly why the IDP, in its published form, is silent on the blue infrastructure that the Trust is responsible for.

In this context, the statement at 1.3.7 that, “Information within the IDP has been gathered through an in-depth analysis of all relevant strategies and plans, as well as engagement with statutory and non-statutory consultees.” is difficult for the Trust to accept. The fact that there is no reference whatsoever to the vital blue infrastructure, in close proximity to the River Waterfront, which is managed by the Trust does not particularly demonstrate, “in depth analysis”.

Infrastructure Delivery in Strategic Growth Areas (Page 14 - 15)

At section 2.3 the IDP discusses the draft allocated River Waterfront development sites north of Gillingham (Policy A4) which could deliver circa 4,200 new homes.

At paragraph 2.3.3 the IDP says, “A Green & Blue Infrastructure Strategy will inform the place-making and the design, addressing the inadequate provision of green space.” This statement is somewhat confusing because the IDP forms part of the Green & Blue Infrastructure strategy. Indeed, the IDP contains an entire section devoted to Green and Blue Infrastructure at page 82 – 87. It should not be left for a future planning application(s) to address such important matters and issues. Furthermore, there is no recognition in the

River Waterfront section which refers to existing blue infrastructure or the need for such a major development to make any contributions towards the existing blue infrastructure that exists in the area.

Once again, the IDP omits any reference to the water basins, the marina, the Water sports Centre and is silent on the lock gates and caisson and the temporary access across Barrack Road, which themselves require on-going maintenance and management and which are clearly important elements of blue infrastructure local to the River Waterfront draft allocation.

The Trust considers that the section relating to the River Waterfront should be re-drafted to include references to the water basins and to the need to ensure that the lock gates and penstocks, which play such a vital role as part of the water-exchange system, are maintained by the developer.

Infrastructure in Medway (Page 20)

Section 3 of the IDP sets out an overview of the types of infrastructure split into themes.

The Trust is surprised that none of the themes relate to the river waterfront, water sports or the marine environment. These are elements that deserve to form part of their own theme. Water and marine based activities are central to the heritage, culture and character of Medway. The Trust considers that the IDP should be redrafted accordingly to give appropriate prominence and safeguarding to marine based infrastructure.

At 3.6 the Council incorporates the theme of 'Community & Cultural Facilities' within which the Council acknowledges that, "Community and cultural facilities are crucial to Medway's vision for regeneration (paragraph 3.6.2)

At page 63 the Council discusses the important role of visitors and tourism to the area in terms of employment and spend. There follows six pages of itemised facilities and opportunities and yet nowhere in this section is there any reference to the Trust, the water basins, the marina, or the Water sports Centre.

At page 77 the Council discusses Sport & Leisure including facilities run by commercial providers, there is no reference to the Water sports Centre or to the water basins or the marina.

It is as though in drafting the IDP there has been a blind spot towards the Trust's extensive resources and facilities and land holdings which lie adjacent to the Council's largest regeneration zone on St Mary's Island.

Green & Blue Infrastructure (page 82)

At page 82 – page 87 of the IDP, the Council refers to Green and Blue Infrastructure. There is very little reference to any blue infrastructure at all, which is surprising given the important role of the River Medway to the area's culture, heritage and economy and the existence of the Council's River Medway Strategy. It is

also surprising given the close proximity of the Council's major growth allocation forming part of the River Waterfront (Policy SA4) to the Water sports Centre, water basins, and marina.

The Council may say in its defence that the Water sports Centre is not a public facility for which the Council and the taxpayer is directly responsible. However, such a view would be to disregard the fact that the Council does have responsibilities to the Water sports Centre by virtue of the s106 legal agreements between the Council and public bodies. The Water sports Centre on Basin 2 exists by virtue of S106 agreements and provides a much needed community facility, supporting schools, organised groups and charities. Medway Council will benefit in the long term and as such have a responsibility to deliver the right outcome to this important blue infrastructure, and yet there is no reference to this blue infrastructure or its components anywhere in the IDP.

Conclusion

The Trust is very reluctant to object to the Local Plan or the evidence base supporting the Local Plan. The Trust is very keen that the area is regenerated with new homes and employment opportunities, and that public and private investment delivers growth and prosperity in the wider local area. However, planned growth must not be at the expense of established blue infrastructure or to the detriment of marine environments.

In this regard, the Water Basins, Water sports Centre, and the lock gates which perform a vital role of water exchange between the basins must not be left as an after-thought or disregarded until the consideration of a future planning application. These local blue infrastructure assets are too important and are clearly public interest matters. In relation to the Water sports Centre, the Centre is funded through s106 planning obligations and the Council has a legal and moral obligation to ensure that its future is safeguarded.

Nothing in the published IDP addresses these points and nothing in the IDP places any onus on the developers of the River Waterfront regeneration proposals to maintain the lock gates, and as a consequence there is nothing contained in the IDP or the Local Plan to ensure the future health and vitality of the water basins and their marine eco-systems.

In this regard, the Trust has little choice but to register a **holding objection to the Infrastructure Delivery Plan (IDP) and inter-alia to the Local Plan** of which the IDP forms a key part of evidence.

I would be grateful if you would confirm that this holding objection has been duly made within the appropriate consultation timeframe.

Yours faithfully,

[Redacted signature]

Philip Scott
Group Partner

[Redacted contact information]

Copied to: Louise St John Howe (Local Plan Programme Officer)

Enclosure: As stated above.

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Your ref:

Our ref: CMT – The River
Medway Strategy – Water
Basins & Caisson, Barrack
Road

28th January 2026

BY EMAIL: adam.bryan@medway.gov.uk

Dear Adam,

THE RIVER MEDWAY STRATEGY - LAND AT CHATHAM MARITIME INCLUDING WATER BASINS AND CAISSON, PENSTOCKS AND CULVERTS (BARRACK ROAD).

Further to Richard Farrer's email to you on 21st January 2026 and your email reply dated 27th January regarding the River Medway Strategy paper presented to the Council's Regeneration Culture & Environment Overview and Scrutiny Committee ('the Scrutiny Committee') on 11th December 2025.

As Richard briefly set out in his email to you the Chatham Maritime Trust ('the Trust') was somewhat surprised and concerned to read the published paper absent of any advanced engagement with the Trust prior to the paper being considered by the Scrutiny Committee.

In particular, the Trust notes that section 8 of the Committee paper says that, "The Strategy has been developed involving extensive consultation and engagement with key stakeholders and external agencies with an interest in the River Medway". However, the Trust, which owns and controls significant land in the area including Basins 1 and 2 and the Water Sports Centre, has not yet been consulted regarding the emerging Strategy.

The Trust is even more concerned to read that the officer's paper to the Scrutiny Committee included reference at section 4.3 to direct input from Peel Ports regarding the, "...functioning of the lock gates.." which relates to the future of the caisson, penstocks and culverts forming part of Barrack Road. The paper goes on to report to the Scrutiny Committee that according to Peel Ports the lock gates, "...will be permanently closed."

This is a particularly worrying assertion because the lock gates referred to in the Scrutiny Committee paper are a vital component of the water exchange system between basin 3 (controlled by Peel) and water basins 1 and 2 which are owned and managed by the Trust. Notwithstanding this context, the statement regarding

the future of the lock gates has been reported to the Scrutiny Committee without any wider discussion or understanding as to what the impact of closing the lock gates (the water exchange system) might have on the Trust's land assets or its responsibilities.

In my letter to your colleague Dave Harris dated 18th September 2025 (see attached), I emphasised that the Trust is supportive, in principle, of the Council's regeneration strategy regarding St Mary's Island and the wider local area. However, I also emphasised the vital importance of the water basins and caisson, penstock and culverts, and the lock gates to the functionality and the environmental quality of basin 2, and inter-alia, the future of the Watersports Centre which relies on the depth and water quality in basin 2.

I also emphasised in my letter that the Trust is keen to ensure that it is consulted at the earliest possible stage regarding any proposals that affect the lock gates forming Barrack Road.

Any attempt to close the lock gates will affect the water exchange system between basin 3 and thereafter basin 2. Without a proper understanding of its functionality and role this could lead to very significant impacts to the water quality, including the reduction in water depth and stagnation / pollution of the water within basin 2. Furthermore, the closure or failure to maintain the lock gates could be highly detrimental to the functionality and the employment potential of the Watersports Centre, and to local tourism.

In this regard, the Trust is advised by Laguna Science who act as the Trust's water and ecology advisors. If there was any doubt regarding the potential harmful impact that could arise through the closure of the lock gates between basin 3 and thereafter basin 2, I have attached advice from Laguna Science which sets out in more detail what the direct impacts of closing the lock gates could involve.

Such negative impacts, were they to arise, would be in direct conflict with the stated aims and objectives regarding Leisure and Sport Activities (section 4.2) and Environmental and Habitat Activities (section 4.4) as set out in The River Medway Strategy paper.

Finally, you will no doubt be aware that in relation to the Watersport Centre, the facility was partly funded with financial contributions secured through section 106 legal agreements arising from approved residential developments. In all these respects, the potential closure of the lock gates will have a range of significant impacts which the Strategy paper has not considered, or at the very least, did not set out for committee Members.

To conclude, the Trust for its part, is very supportive of the Council's regeneration objections for the area including the proposed regeneration of St. Mary's Island. The Trust is keen to help the Council meet its objectives, and one way in which it might assist is through discussing and exploring the future of the lock gates to ensure the health and vitality of the water basins and the Watersports Centre, whilst enabling the regeneration of St Mary's Island to progress at pace.

I understand that a meeting has been arranged with the Trust for the 11th February, and we look forward to discussing the points raised in this letter and the attached information.

Yours sincerely,

[Redacted signature]

Philip Scott
Group Partner

[Redacted contact information]

Enclosure: As stated above.

Dave Harris
Chief Planning Officer
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T: 020 7518 3200

Your ref:
Our ref: CMT – Town
Planning advice

18th September 2025

BY EMAIL: Dave.Harris@Medway.gov.uk

Dear Dave,

LAND AT CHATHAM MARITIME INCLUDING WATER BASINS AND CAISSON, PENSTOCKS AND CULVERTS (BARRACK ROAD) IN THE CONTEXT OF PROPOSED REGENERATION AT ST MARY'S ISLAND, CHATHAM

I write on behalf of my client, Chatham Maritime Trust ('the Trust') regarding the Trust's land and property interests, and its core responsibilities, at Chatham Maritime Marina and water basin 2 in the context of Medway Council's growth agenda for St Mary's Island, as set out in the emerging Medway Local Plan 2041.

As you know, the Trust's property interests are extensive and its role and scope of responsibility in managing those interests for the benefit of the wider local community (and visitors to Chatham) is very important.

The Trust was aware of the recent public consultation exercise (Regulation 19) which ended on the 11th August 2025. The Trust decided not to submit representations to that consultation exercise because the Trust is keen to avoid any misunderstanding, or any mis-held view, that the Trust objects to the emerging Local Plan. Indeed, the Trust is supportive, in principle, of the Local Plan's aims to enhance the local economy in Chatham, to provide new homes for local people, the creation of jobs through economic investment, and the need to protect and enhance the local environment.

The Trust is fully aware of the Council's growth agenda set out in the Medway Local Plan 2041, particularly the proposed 'Urban Regeneration Sites'. One of the key areas identified for future regeneration is St Mary's Island which will require a credible permanent access solution.

For the purposes of this correspondence, the Trust is focused on its responsibilities regarding water basin 1 incorporating Chatham Maritime Marina, and water basin 2 (see below) including the water sports centre, together with the associated body of water within the basins up to the caisson and penstocks forming part of Barrack Road.



Image: Water Basin 2 between Maritime Way and Barrack Road. The Caisson and penstocks are situated under Barrack Road.

The Caisson, Penstocks and Culverts

To be clear, the caisson is a temporary and moveable structure, designed to be removed and replaced, allowing access for marine craft between the water basins. The caisson was not designed to carry traffic, and the access over it is temporary. The existing structure is not designed or constructed to act as a bridge.

The Council has resolved to allocate St Mary's Island as part of a major area of housing growth. Any long-term formalised access needed to serve the development on St Mary's Island will require a credible access solution and that will itself require multi-party negotiations.

The construction of a bridge across the water will lead to the caisson being removed. In any event the penstocks and culverts (the water exchange system) will need to be upgraded or replaced as part of any major works associated with a future planning application.

In relation to such engineering works or a future planning application, the Trust is keen to ensure that is consulted at the earliest possible stage.

Recent events have demonstrated just how sensitive and important the caisson, penstocks and culverts are to the water level and water quality in basins 1 and 2. I do not wish to go into detail here regarding that recent event, but the impacts on the water levels and quality were significant.

In all these respects, whilst the Trust is supportive of the Council's growth objectives regarding St Mary's Island, the Trust is particularly keen to ensure that the future of the caisson, penstocks and culverts forming part of the water exchange system between the basins, is carefully considered as part of any future development proposals.

The Trust would welcome the opportunity to meet with you and Council colleagues to discuss the points raised in this letter, and I look forward to hearing from you shortly.

Yours sincerely,

[Redacted signature]

Philip Scott
Group Partner

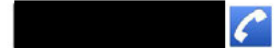
[Redacted contact information]



28th January 2026

Richard Farrer
Chatham Maritime Trust
The Wharf, Maritime Way,
St Mary's Island,
Chatham ME4 3ES

Unit 2F
Admiral Business Park,
Cramlington NE23 1WG



Dear Richard

River Medway Strategy - Cessation of impoundment from Basin 3 to Basin 2

Further to our recent meeting, I have set out below the issues that are likely to develop with water quality if impoundment of water from Basin 3 is ceased. I understand that in the River Medway Strategy document it is indicated that the Basin 3 'lock gates' (which is understood to include the navigation lock, penstocks and caisson between Basin 2 and 3) will be permanently closed. This proposal will effectively cut off a key water supply to Basin 2 and may lead to potential significant negative impacts on the water quality in Basin 2 and 3 and thereby the future use of Chatham Maritime Trust's Watersports centre.

Prior to addressing the adverse effects of discontinuing impoundment from Basin 3, it should be clearly recognised that Basin 2 is an impounded marine waterbody. Consequently, direct comparisons between this location and impounded freshwater systems, such as Salford Quays, are unsuitable, as marine environments necessitate distinct strategies for water quality management.

The key water quality management requirements for impounded marine systems are:

- Ensuring adequate dissolved oxygen concentrations at all depths within the dock;
- Maintaining appropriate salinity concentrations;
- Keeping water levels stable; and
- A Controlled impoundment regime

The requirements are intended to support a diverse and thriving marine fauna throughout the dock bed and its submerged walls. Numerous sedentary marine species present are filter feeders, serving as an extensive biological filtration system that contributes significantly to sustaining water quality.

Maintaining high water quality standards in Basin 2 is essential to ensuring its continued suitability as a safe venue for water sports. Additionally, Basin 2 represents an important historic landscape feature within the surrounding developed area, making its visual integrity, that maybe directly impacted by water quality, a matter of priority. The basin's water supply is currently sustained through hydrological connections with the adjacent Basins 1 and 3, as the waterbody has no direct abstraction connection to the tidal River Medway.

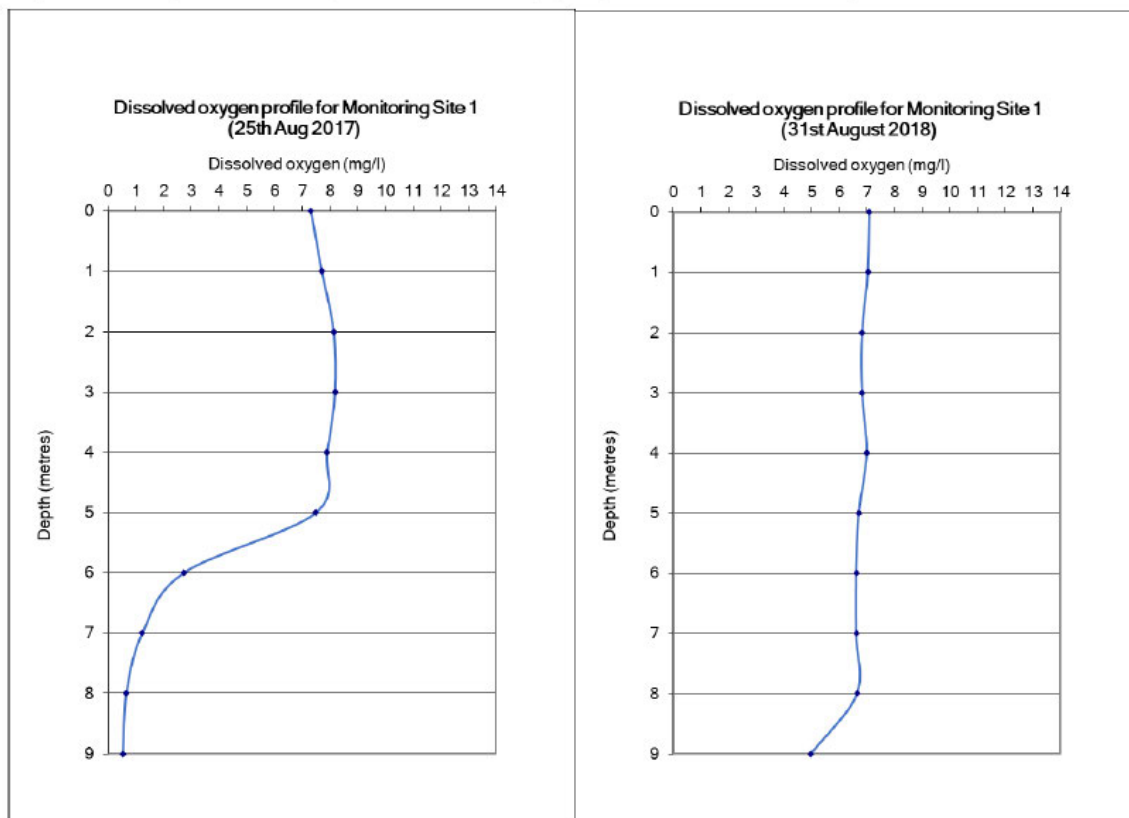
The management requirements for Basin 2 are discussed in greater detail below.

Dissolved Oxygen Concentrations

Enclosed marine environments, like docks, often experience low levels of dissolved oxygen in deeper waters during the summer. This occurs when bacteria decompose organic matter and the remains of dead marine plants and animals, consuming oxygen in the process. These low-oxygen conditions can cause various negative impacts, including:

- Limit the presence of marine plants and animals on the dock bed and lower perimeter walls.
- Permit nutrients and pollutants to be released from the bed sediments.
- Result in the production of unpleasant-smelling gases, such as hydrogen sulphide.

This was the case with Basin 2 prior to installation of the aeration mixing system by Chatham Maritime Trust in 2018. The benefits of the aeration system can clearly be seen in the pre and post installation dissolved oxygen profiles with the dock effectively having insufficient oxygen to support marine life biologically dead below a depth of around 6m.



Enhanced levels of dissolved oxygen have enabled marine life to thrive throughout the full depth of the dock walls and across the dock bed, substantially increasing the biofiltration capacity and contributing positively to water quality and algae management. Additionally, this improvement has eliminated the odour previously associated with Basin 2.

Salinity

Maintaining appropriate salinity levels is essential for effective water quality management in impounded marine docks, such as Basin 2, and for supporting self-sustaining populations of marine fauna that contribute to water quality management through biofiltration. Typically, a minimum salinity of approximately 25 parts per thousand (PPT) is necessary. When docks become increasingly brackish, various management issues can arise, including reduced ecological diversity (since few species are adapted to brackish environments) and associated

ecosystem instability, and an increased risk of toxic algal blooms, which may result in amenity closures due to potential user health risks.

Salinity concentrations are subject to ongoing reduction due to freshwater runoff from paved areas surrounding the docks. However, these reductions are typically balanced by impounding saline water, which helps preserve both salinity and water levels lost through leakage and evaporation. Basin 2 is reliant on its saline water supply from the connections with the adjacent Basins 1 and 3. According to summary statistics from monitoring over the past two years (as shown below), Basin 3 displays higher salinity concentrations compared to Basin 1. This outcome is anticipated because Basin 3 impounds water from a lower point on the Medway Estuary that is subject to less influence from upstream freshwater river discharges.

Summary Statistics for salinity concentrations recorded in Basin 1 to 3 for 2024 and 2025.

	Basin 1	Basin 2	Basin 3
mean	24.75	24.50	26.03
st dev	2.00	2.09	1.88
median	24.42	24.25	25.39
min	21.49	21.36	22.85
max	28.1	27.86	29.02

Given this characteristic of the combined dock system, Basin 3 serves as the most suitable source of water for supporting salinity maintenance in Basin 2. Discontinuation of this input is expected to result in gradual decreases in salinity, which may adversely affect the marine ecosystem, water quality, and amenity value.

Stable Water Level

Stationary marine filter feeders play an important role in maintaining water quality, but they are susceptible to changes in dock water level. Prolonged decreases in water levels can result in significant mortality among these exposed organisms, leading to diminished biofiltration capacity and the associated impacts on water quality. Additionally, the decomposition of deceased fauna may negatively affect water quality by increasing oxygen demand, releasing surface oils that form scum, and generating unpleasant odours.

In the past two years, Basin 2 has encountered persistent difficulties in sustaining water levels due to structural deficiencies, notably a leaking caisson between Basins 2 and 3 and penstocks seized in the open position. Simultaneously, Basin 3 has suffered substantial water loss due to damaged lock gates. These complications have caused water depth variations in Basin 2 of up to one metre, exposing and drying a one-metre-wide strip of marine fauna along the entire dock wall perimeter, which has contributed to a range of previously mentioned issues.

Controlled impoundment Regime

To ensure water quality maintenance of a high standard in enclosed marine systems, it is essential to implement a rigorously managed impoundment strategy. Water should only be impounded to the extent necessary to sustain appropriate salinity levels and maintain a stable water level, while minimising the introduction of excess sediment and nutrients commonly found in tidal rivers supplying the system. Excess nutrients, especially when populations of marine filter feeders are diminished, can promote algal blooms that adversely affect visual aesthetics, water quality status, and recreational amenity. In addition, having control over the inflows and outflows is important in the event of the need for emergency pollution control.

The systems for controlling water and managing impoundment in Basin 2 are already established. The caisson and penstocks dividing Basin 1 from Basin 2 are functioning, although water coming from Basin 1 is less ideal as a supply due to its lower salinity. The main challenge in managing Basin 2's impoundment regime lies with the caisson, which has significant leaks, and the seized penstocks that separate Basin 2 from Basin 3. The status of the penstocks connecting Basin 3 to the tidal Medway is still unclear. However, there is a possible water supply route that could offer better salinity levels if water is primarily impounded from the tidal Medway via Basin 3 into Basin 2. To achieve this, repairing or replacing the faulty control mechanisms along this route will be necessary.

Potential Impacts of cessation of impoundment from Basin 3

Permanently closing the impoundment mechanisms that supply water from Basin 3 to Basin 2 is likely to negatively affect marine ecology, water quality, and the site's value as a watersports centre. Basin 3 probably offers the most suitable saline water source for Basin 2, helping to sustain the ecosystem and maintain water quality, which in turn supports its use for recreational amenities.

Basin 2 has undergone long-term monitoring and currently holds an excellent bathing water quality status according to Bathing Water Regulations. There have been no harmful algae blooms detected in the waterbody. However, as water level maintenance problems have increased in Basin 3 in recent years, and due to direct hydrological connections from a compromised caisson and open penstocks, some related effects are now starting to appear in Basin 2.

If water from Basin 3 is permanently cut off, Basin 2 will have to depend entirely on Basin 1 for its water supply. This could result in several negative consequences, such as:

- A gradual drop in salinity that could affect marine plants and animals, as well as reduce the biofiltration ability needed for maintaining water quality and supporting recreational use.
- A higher risk of hazardous algal blooms, like blue-green algae, forming as salinity decreases. Severe outbreaks may force the temporary closure of the Watersports facility.
- Pollution risks from accidental boat discharges or spills of fuel or chemicals in the Basin 1 marina.

Additionally, if Basin 3 loses connection to the tidal Medway, over time the water within this dock is likely to become brackish and present management challenges, including unattractive algae growth and unpleasant odours.

Accordingly, I recommend that, instead of permanently eliminating Basin 3 as a potential future water source for Basin 2, efforts should be made to investigate and implement strategies to refurbish the existing water impoundment route through Basin 3. This approach will facilitate a managed impoundment regime and help ensure Basin 2's continued viability as a high-quality venue for watersports.

Kind regards



Richard Steel
Director of Laguna Science Ltd.

From: [REDACTED]
Cc: [REDACTED]
Subject: IDP 2025 feedback not yet incorporated in the latest IDP copy
Date: 24 June 2026 13:08:48
Attachments: [image001.png](#)
[260618 B2 IDP Dec25 CA review.pdf](#)
[RE MedwaySouthern Water - IDP comments scheme information.msg](#)

Dear Sir/Madam – thank you for your email inviting us to comment on the evidence base to the Regulation 19 draft of the Local Plan. Having reviewed key documents to Southern Water, we note the following:

- The IDP document has not been updated to our last set of comments, or to include the investment plans we confirmed to Medway for 2025-2030. I therefore share both some high level comments on the current Regulation 19 version of the IDP in addition to resharing our last consultation feedback on the IDP that has not yet been accounted for within the document. Please therefore refer to the attached email for detailed feedback on the IDP and our investment information for 2025-2030.
- The Sustainability Appraisal of the updated SFRA concludes there are minor changes (increases) of surface water flood risk for 12 non-strategic sites. Although perhaps not a significant for the Sustainability Appraisal, this demonstrates how SuDS delivery is important to non-strategic development and why Southern Water is seeking compliance with the National Standards for SuDS across all development.

We look forward to hearing of progress with your IDP updates.

Yours faithfully,

Catherine Adamson
Strategic Planning Lead
Kent & East Sussex

[REDACTED] [uk](#)



From: Medway Council <MedwayCouncil@public.govdelivery.com>
Sent: 05 June 2026 16:39
To: Policy, Planning <Planning.Policy@southernwater.co.uk>
Subject: Medway Local Plan e-bulletin: June 2026

Medway Local Plan 2041.

Consultation response relating to new Transport Evidence 18.1 and 18.7 – Ray Dines 24 June 2026.

Introduction

The proposed housing allocations LW4 and LW8 in the Capstone Valley are entirely reliant on improved connections to M2 at junctions 3 and 4. My comments relating to the latest Transport Evidence are as follows:-

- Both Motorway junctions already operate well beyond capacity, as previously acknowledged at the Maidstone Local Plan Hearings in 2022/3.
- The transport modelling Forecasting Report B18.1 lacks any credibility because it relies on the totally inadequate Figure 13 “Concept Plan” (page 273 of the Submission Plan A1) and flawed assumptions in paragraph 4.2.4 (6 bullet points on page 44 and figure 4.3 on page 45).
- The recently approved Lidsing SPD provides no certainty that required improvements at Junction 4 will be delivered within the plan period, nor that they would offer adequate capacity if and when completed.
- The new link to M2 junction 4 within the North Down National Landscape has no status in either the Maidstone or Medway Local Plans. The planning application process would involve two Planning Authorities, three Highway Authorities and Natural England. The “exceptional need” for works within the National Landscape is yet to be proven.

At present, there is no National Highways-approved scheme for the proposed new link road to M2 junction 4. There are serious doubts that the scheme can be delivered within the scheme promoter’s land holding. The construction of a replacement bridge over the M2 at an angle and at the similar level to the existing structure would be extremely difficult. No construction method statement has been provided and the cost, viability, and timing of such a scheme is very questionable.

At the Maidstone Local Plan Hearing in 2022/23 National Highway raised concerns about the proximity of the new bridge deck and wing walls to the live M2 running lanes. Three years on and detailed drawings have yet produced showing that the connection to Maidstone Road can be made within the promoter's land holding to the approval of National Highways.

These uncertainties are confirmed by the need for the development of an "Interim Scheme" for M2 junction 4 (B18.7 paragraph 13.3) involving various slip road improvements but no direct connection to the proposed East -West link and the M2 at junction 4. This approach was specifically ruled out by the Maidstone Local Plan Inspector in his decision letter dated 8 March 2024 (paragraphs 161 and 162 on page 43). He also placed much importance on the early delivery of the East – West link. (paragraphs 166,169,170 and 176 and Main Modifications)

Detailed observations.

- The proposed Interim scheme (B18.7 13.3) involving minor changes to M2 junction 4 can not assessed in isolation. Without the new East-West link to M2 junction 4 there would be an intolerable impact on local roads including Hempstead Road, the residential section of Chapel Lane, Hempstead Valley Drive, Sharsted Way and its junction with the A278.
- This route is already heavily overloaded and would become far worse if piecemeal development at Lidsing and in the Capstone Valley is allowed to progress.
- There would be similar issues with traffic rat running through the villages of Bredhurst and Boxley and unsuitable residential including Clandon Road and Gleaming Wood Drive to access M2 at junction 3 via Lordswood Lane and Walderslade Woods Road.

There are also serious concerns about the way that the proposed allocations LW4 & LW8 have been modelled in the B18.1 – Forecasting Report and B18.7 - Junction and Modelling Mitigation Report.

- These reports post date the Regulation 19 public consultation and have therefore not been subject to full scrutiny.
- The focus of these reports is very much on the A228 corridor.

- It is important to stress that the design and model outputs for M2 junction 4 originate from a third party – Charles and Associates Consultants – acting on behalf of Capstone Valley scheme promoters (B18.1 page 129 - paragraph 8.3.8). This input can not therefore be regarded as unbiased.
- The number of houses assumed for the Lidsing Development (1300) –(B18. 1 Table 3-3 page 24) is incorrect, the actual number should be 2000.
- The assumptions for the Lidsing access arrangements B18.1 page 44 are either inaccurate or impractical. They are also inconsistent with Figure 4.3 on page 45. Closures of Lidsing Road and Westfield Sole Road(at Blind Lane near the Harrow PH) are clearly impractical without consideration of essential access or any indication of the proposed development layout other than the main spine road.
- A connection to Forge Lane (bullet point 4) is not possible. The latest proposals for Gibraltar Farm development make no provision for a roundabout connection with the Lidsing development (bullet point 5)
- The 6 bullet points on page 44 are not accurately reflected on Figure 4.3 (page 45).
- The assumptions in B18.1 Table 5-4 page 54 - about the network connections for sites LW4 and LW8 by way of simple priority junctions is clearly inappropriate. Shawstead Farm Lane , Ham Lane and Capstone are single track rural lanes and not in any way suitable to serve such a major development.
- Paragraph 13.2 in B18.7 (The full scheme) presupposes that the new link to M2 junction 4 and the new bridge over the motorway are in place. As explained above there is no certainty of this.
- Any improvement scheme for M2 at junction 4 needs to be considered in its entirety including the problematic connection to Maidstone Road and the Lidsing East- West Link.
- The proposed very short merge from the M2 junction 4 interchange onto the new 4th arm of the junction is not workable or safe and has not been subject to a Safety Audit. The full detail of

the proposed 4th arm to the junction and the new bridge over the M2 (B18.1-paragraph 8.3.8) is not shown on the plan.

Conclusion

The latest Transport Evidence fails to demonstrate that any further housing development in the Capstone Valley can be safely accommodated on the Local or Strategic Highway Networks. The Master Planning for the area is totally inadequate. The proposed housing allocations LW4 and LW 8 are therefore unsound and should be deleted.

End.

Ray Dines

[REDACTED]

ME5 [REDACTED]

[REDACTED]

[REDACTED]

Response to Consultation Regarding document MLP/ED7 and associated documents.

Please note that for ease of reference I have included the text of the relevant paragraph greyed out with my comments shown in bold italics.

This document deals with the response to the following:

- MLP/ED7
- Duty to Cooperate Statement, Submission Document, Medway Council, Regulation 22, December 2025
- Green Belt Exceptional Circumstances Topic Paper, Submission Document, Medway Council, Regulation 22, December 2025

MLP/ED7

GREEN BELT NOTE MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' INITIAL QUERIES LETTER (MLP/ED5)

Response to Paragraph 22 of MLP/ED5

Page 6 Recommendations from Medway's Green Belt Review 2025 (ref: B8)

Medway's Green Belt Review (ref: B8) has identified a total of eight parcels as grey belt (Appendix 1). Further decision-making considered the prioritisation of land set out at paragraph 148 of the NPPF. No Green Belt land is identified or proposed for release. With the identification of grey belt parcels through the Green Belt Review (ref: B8), the Council identified the most suitable grey belt land for release where it would meet the needs of the Local Plan, align with its aims and objectives and promote sustainable patterns of growth.

The statement that "no green belt land is identified or proposed for release" is disingenuous. The land proposed for release has been Green Belt land for decades and still fulfils the purposes of Green Belt and was only incorrectly identified as Grey Belt by the Medway Council when preparing the Draft Local Plan.

Additional points for consideration in decision-making included the following: For Gravesham Borough Council (GBC), there has been a longstanding commitment (Appendix 2). to review their Green Belt, given the limited availability of land within the urban area (Gravesend and Northfleet) and

viability constraints. Given limited opportunities to expand the Gravesend urban area due to the impact of Lower Thames Crossing, development focused on Chapter Farm (Gravesham's part of the cross boundary site allocation) presents the most sustainable option to meet Gravesham's development needs within their emerging Local Plan strategy.

The Medway Draft Local Plan cannot be considered sound when it is based on GBCs Local Plan which is yet to be inspected and GBCs Green Belt review which is also not complete (see page 10 of Medway Council response to MLP/ED5). The draft Medway Local Plan relies on the cross border development with GBC and does not include any consideration of an alternative outcome in the eventual GBC Local Plan. A plan relying on an uncertain outcome without a "plan b" cannot be considered sound.

The Transport Assessment for the Lower Thames Crossing also identified potential impacts on the road network in the Medway Valley that could arise from the Lower Thames Crossing, i.e. air and noise pollution as well as significant traffic congestion. Therefore, this was one reason why growth in the Medway Valley needed to be limited.

It is inevitable that the proposed developments will generate increased traffic congestion in north Strood (particularly in the Reded Court Road and Brompton Farm Road areas resulting in increased Air and Noise pollution. Given the Council's acknowledgement of the need to limit growth on the basis of traffic congestion, noise and air pollution from developments of this scale it follows that the growth proposed in North Strood should be limited.

Response to Paragraph 22 of MLP/ED5

Page 7 Paragraph 1 (after bullets)

Given the promotion of Gravesham Green Belt land at Chapter Farm, the combination with parcels 1, 2, 3 and 4 offered a robust sustainable option, which brought with it the opportunity to deliver a sustainable community with appropriate infrastructure and sustainable travel options. This was considered the most suitable grey belt option, in preference to other grey belt parcels identified, to consider further through the site selection and sustainability appraisal processes.

The Council is relying on an incorrect reclassification of Green Belt land from its flawed Green Belt Review. The infrastructure is not appropriate particularly in respect of health provision, roads and water supplies. It should also be noted that the Medway Council SA confirmed that plans without the GBC unmet housing need gave a better SA outcome.

Page 7 Paragraph 2 (after bullets)

Medway's Sustainability Appraisal (ref: A3.2)⁸ explains, in the context of parcels 2, 3

and 4, the site selection process from the Regulation 18 stage through to the final site chosen as part of Medway's Local Plan strategy. The introduction of 'grey belt' in conjunction with discussion with GBC brought these parcels into consideration and they performed better than other sites.

The land in parcels 2,3 and 4 should not be considered Grey Belt as this relies on the flawed and incorrect judgements made in the hastily prepared Green Belt review which may well be considered as a justification for a decision already made rather than a robust independent view.

Page 7 Paragraph 3 (after bullets)

Additionally, Medway's Sustainability Appraisal (ref: A3.3)9 at K.2.6.7 factors in the Green Belt Review and its findings to confirm no significant harm to the Green Belt purposes if these parcels were released as part of the cross border site allocation.

The Council's assessment in this regard is wrong; there is clearly harm to the purposes of the Green Belt as it will remove separation between the urban developments of Medway and Gravesham.

Page 7 Paragraph 4 (after bullets)

The intended changes confirm parcels 1, 2, 3 and 4 for removal from the Green Belt. These parcels form Medway's part of the cross border site allocation as set out in policy SA6 of the submitted Local Plan.

Once again, the removal of Green Belt status is not appropriate due to the flawed Green Belt Review.

Page 7 Paragraph 5 (after bullets)

Therefore, to reflect Medway's Local Plan strategy accurately, it is necessary that the Green Belt boundary is amended in the Policies Map to show the removal of this site allocation from the Green Belt.

Amendment to the Green Belt boundaries on the basis of the flawed Green Belt Review is not necessary as the Green Belt review is flawed.

Page 7 Para 6 (after bullets)

Parcels making up site allocation SA6 (parcels 1, 2, 3 and 4) are most suitable and preferable in comparison to parcels 9, 12, 13 and 17 (Appendix 1). Parcels 9, 12, 13 and 17, whilst identified as grey belt land in the Medway's Green Belt Review (ref: B8) are therefore, not required for release from the Green Belt to support Medway's Local Plan strategy. To ensure consistency of the approach, changes to table 1 (page 7) of the Green Belt Exceptional Circumstances Topic Paper (ref: B22.4) are proposed to reflect Appendix 1, which officers recommend could be supplemented

by way of an addendum.

Please refer to comments submitted on the Green Belt Exceptional Circumstances Paper. This paper is clearly an attempt to retrospectively justify an unsound plan and Green Belt Review. The “exceptional circumstances” have been created by the Council to justify its draft Local Plan.

Page 8 (Responding to Paragraph 23 MLP/ED5)

Paragraph 3

There was a high level of demand for suitable consultants to conduct Green Belt reviews following the December 2024 NPPF and the updated guidance. The availability of consultants was severely constrained. Medway Council (MC) required a focused piece of work in comparison to GBC, given the smaller extent of Green Belt coverage in Medway. Medway’s Local Development Scheme set summer 2025 for the publication of the plan at Regulation 19. It was not possible to meet this timeline if the Council was reliant on the capacity of external consultants, and the decision was taken to progress the required work in house, conducted by Planning and Landscape officers. This necessitated the review being taken forward independently of GBC’s review, albeit with an understanding of the need to maintain engagement and to collaborate on this matter. Discussions continued as part of the masterplan process and wider discussions related to the cross border allocation.

The Council is attempting to use its own inefficiencies to justify a failure to conduct a proper independent and robust review and instead conduct a flawed review excluded stakeholders from the process. The Council was well aware of the proposals to develop on the Green Belt land and the need for a Local plan in 2023 but did not act until 2025. This cannot be acceptable.

Paragraph 4

Discussions at Duty to Cooperate meetings held on the 22nd of April and 19th September 2024 (Appendix 3) with GBC officers confirmed their intention to promote Chapter Farm as a site allocation in their Local Plan strategy.

This underlines that the Council was aware of the need to review Green Belt land in plenty of time to conduct a proper review but chose not to. The duty to co-operate process appears to be a case of GBC imposing its problems on Medway rather than a genuine consultative and co-operative process.

Page 9 (Responding to Paragraph 23 MLP/ED5)

Exceptional Circumstances

Paragraph 1

The Council does not believe that there would be exceptional circumstances to justify the release of land to the west of Strood if the release of Green Belt land in the

adjoining part of Gravesham did not happen. If Gravesham did not release their Green Belt land, Medway's Green Belt would be performing its function as part of the larger Green Belt. Even though land forming site allocation SA6 is identified as grey belt land following the introduction of the new grey belt guidance since December 2024, the impact on the wider performance of Green Belt in this location could be undermined and thereby impact on Gravesham's Green Belt land being able to perform its functions effectively. This would be the overriding consideration not to release land west of Strood in these circumstances.

This acknowledges that there is a valid purpose for the Green Belt in Medway to be maintained. The Medway Local Plan is being manipulated in the interests of Gravesham and not the residents of Medway.

Paragraph 2

Given the location of the Green Belt parcels, bound by the A289, M2 and the edge of Strood, this linear band of Green Belt is required as a whole, across to Medway and Gravesham administrative boundaries to perform its functions to the west of Strood. There is an interrelationship with the Green Belt in Gravesham to robustly perform the required Green Belt functions and vice versa

This is not correct, whilst there is of course a relationship between the Medway and Gravesham areas of Green Belt the Green Belt in Medway is able to perform the function of Green Belt even if Gravesham chooses to release Green Belt land for development.

Paragraph 3

The impacts on Medway's remaining Green Belt resulting from Gravesham Green Belt land being promoted for development in their emerging Local Plan required investigation to assist in decision-making. Initial assessment identified significant impacts on the residual land between the administrative boundary and the eastern boundary of the Green Belt on the periphery of Strood. This narrow area of land would not be able to make a strong contribution to the purposes of the Green Belt. At one point the depth of the residual Green Belt would be 227 metres. Gravesham's Green Belt release covers approximately 103ha, making up 84% of the Green Belt to the west of Gravesend Road, i.e. Medway's remaining Green Belt to the west of Gravesend Road would only be 16%. Development on Gravesham Green Belt land would therefore compromise the ability of Medway's remaining Green Belt to perform its functions effectively. The implications of this required further investigation, consideration, and decision-making.

There isn't a requirement for Green Belt land to be a particular size to meet its purpose. In contrast to the suggestion that the land within Medway would not make a significant contribution I believe that maintaining the Medway land as Green Belt would be very significant and provide a clear break in the urban spread across North Kent. Reference to the 227 metre depth does is not sufficient to support the position of the Council as it ignores the local situation and topography.

Paragraph 5

Medway's Sustainability Appraisal (ref: A3.2)¹² explains, in the context of parcels 2, 3 and 4, the site selection process from the Regulation 18 stage through to the final sites chosen as part of Medway's Local Plan strategy. The introduction of 'grey belt' in conjunction with discussion with GBC brought these parcels into consideration and they performed better than other sites

Page 10 (Responding to Paragraph 23 MLP/ED5)

Exceptional Circumstances

Paragraph 2

Additionally, Medway's SA at K.2.6.7 factors in the Green Belt Review and its findings to confirm no significant harm to the Green Belt purposes if these parcels were released as part of the cross border site allocation.

Removing separation and enabling urban sprawl clearly harms the purposes of the Green Belt.

Paragraph 3

Overall, the cross boundary site allocation performs better sustainably compared to other sites, informed by the sequential approach and sustainability criteria set out in the NPPF¹⁵. It has direct access onto the A226 (Gravesend Road), which connects to the M2 and A2 and is a key bus route corridor linking to services in the centre of Strood and rail stations. The site allocation is therefore well served by road infrastructure and has the ability to introduce rapid bus transit as well as other sustainable travel options.

The Medway Green Belt does not have direct access to the A226. Access would be via small local roads that are not suitable for the scale of development envisaged. Access could be provided via the GBC Green Belt by construction of new roads and junctions, but this is not in the control of Medway Council. The draft Plan is not robust in addressing this issue and consequences if GBC do not provide appropriate road access serving the Medway land packages.

Paragraph 4

The cross border site allocation promotes a sustainable pattern of Development and would bring with it the required infrastructure to support a sustainable community. It also aligns better with the Local Plan vision and strategic objectives in creating sustainable communities and sustainable patterns of growth

This is simply not true.

The draft Plan does not address adequately the issue of health infrastructure which is already effectively in crisis in Medway at both hospital, GP and general health services. The scale of development will directly impact the availability of health services for Medway residents.

The plan does not address the issue of water Infrastructure including water supply and sewerage services. The local water supplier, Southern Wate, sent an email to customers in North Strood (directly adjoining the proposed

development site) on 7th May 2026 urging customers to reduce water usage and warning that “As soon as 2030, water demand in the South East could exceed supply.” The Draft Plan proposing development of thousands of additional households cannot be considered sound if it does not address this issue. A piecemeal approach would clearly not be adequate and is not sustainable.

Duty to Cooperate Statement, Submission Document, Medway Council, Regulation 22, December 2025

Chapter 2 Local Housing Need

Section 2.1 Bullet 9

The Council's Sustainability Appraisal (SA) included two reasonable alternative growth options that included Gravesham's calculation of unmet housing need. It is important to note that growth options without Gravesham's calculation of unmet housing need performed better in the SA.

The fact that the Sustainability Appraisal outcome is better without the inclusion of GBCs unmet housing needs demonstrates that for the residents of Medway it is better that GBC find alternative ways to meet its own housing needs rather than reduce the standard of living for Medway residents. This does not look like co-operation but more like coercion and should not be tolerated or appeased.

Section 2.5 bullet 2

The Council did not receive an assessment of land availability from Gravesham Borough Council, therefore two reasonable alternative growth options in the SA that included Gravesham's calculation of unmet housing need could not be justified. In response to the Council's Regulation 19 consultation, Gravesham Borough Council did not raise any objections under soundness or legal compliance

This appears to suggest that Medway Council did not assess the sustainability impact of accommodating GBCs unmet housing need in the Sustainability Assessment supporting its draft Regulation 19 Draft Local Plan but has nevertheless produced a draft plan intended to support GBS unmet need by sacrificing Medway Green Belt land through reclassification to Grey Belt. This does not seem a sound basis for the Draft Medway Plan.

Chapter 6 Green Belt

Section 6.1 Bullets 1 and 2

The Metropolitan Green Belt terminates in the west of Medway, with less than five per cent of the Medway unitary authority area designated as Green Belt. Larger areas of contiguous Green Belt are located within the neighbouring boroughs of Gravesham and Tonbridge and Malling.

As Medway compared to GBC has such limited amounts of Green Belt intended to protect the standard of living and environment for its citizens that Green Belt should not be reduced.

Site promoters have submitted representations to all three authorities about cross-border sites, i.e. Chapter Farm (Gravesham) and Holborough Quarry (Tonbridge and Malling).

This confirms that Medway Council has been in discussion with Commercial Developers for many years, with the express intention of those developers being to build on Green Belt land. Medway Planners have effectively been encouraging Developers to spend resources on plans for land which at the time was Green Belt rather than making it clear that development on Green Belt Land was not welcome. I believe this compromised Medway Councils Green Belt review which it decided to conduct internally rather than using respected independent consultants. This must call in to question the soundness of the Green Belt Review.

Section 6.5 Bullet 1

Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. These sites were subsequently deemed suitable, available and achievable in the LAA. This provides the basis for demonstrating exceptional circumstances for releasing land in the Green Belt.

The exceptional circumstances are based on a flawed Green Belt Review which underrates the role of the Green Belt to the west of Strood in preventing urban sprawl i.e. if this plan is allowed to proceed there will not be any break in housing between Strood and Gravesham and an urban sprawl from Gravesham into Strood will have been created.

Section 6.6

Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by the Council and Gravesham Borough Council.

Medway Council has refused to share the draft masterplan documents with Medway Residents on the basis of it not being in the public interest (Freedom of Information Request INF004656 / FOI004734) but has shared the draft masterplan with Commercial Developers. This undermines the credibility of the Green Belt Review by Medway Council which has paved the way for the proposed Chapter Views development.

Statement of Common Ground Submission Document, Medway Council, Regulation 22, December 2025

Chapter 2, Section 2.1, Paragraph 2.1.6

Gravesham Borough Council previously maintained a longstanding request for the Council to accommodate an estimated unmet housing need of 2,000 homes through responses to consultations and during DtC meetings. The Council has not received an assessment of land availability from Gravesham Borough Council, therefore reasonable alternative growth options in the Sustainability Appraisal that included Gravesham's calculation of unmet housing need cannot be justified. Furthermore, the Sustainability Appraisal found that reasonable alternative growth options without Gravesham's calculation of unmet housing need performed better overall. This matter is **agreed**. In response to the Council's Regulation 19 consultation, Gravesham Borough Council did not raise any objections under soundness or legal compliance.

The fact that the Sustainability Appraisal outcome is better without the inclusion of GBCs unmet housing needs demonstrates that for the residents of Medway it is better that GBC find alternative ways to meet its own housing needs rather than reduce the standard of living for Medway residents. This does not look like co-operation but more like coercion and should not be tolerated or appeased

Section 2.4

Paragraph 2.4.1

The Council and Gravesham Borough Council have cooperated on land to the west of Strood. By 2041, land to the west of Strood, together with Chapter Farm in the Gravesham borough, will comprise a cross-border sustainable location for up to 4,000 homes and employment land. It will also comprise two primary schools, expansion of an existing school in Medway, a secondary school, employment land and a local centre. It will provide a transition between the urban edge of Strood and maintain the identity of the rural settlement of Three Crutches.

For "transition" read "urban sprawl" as the separation of Medway and Gravesham will have been destroyed. That the identity of the rural settlement of Three Crutches should be maintained whilst the identity of the rest of Strood can be subsumed in an uninterrupted urban landscape is wrong. One of the Green Belts specific aims is to prevent this urbanisation of farmland and countryside.

Paragraph 2.4.2

Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, respecting the setting of the Kent Downs National Landscape, to be approved by the Council and Gravesham Borough Council. This matter is **agreed**.

Medway Council has refused to share the draft masterplan documents with Medway Residents on the basis of it not being in the public interest (Freedom of Information Request INF004656 / FOI004734) but has shared the draft masterplan with Commercial Developers. This undermines the credibility of the Green Belt Review by Medway Council which has paved the way for the proposed Chapter Views development.

Section 2.5

Paragraph 2.5.1

Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. Development on Gravesham land would compromise the ability or the remaining Medway Green Belt to perform its functions effectively. The prospect of a comprehensive site coming forward in this location would render this location more sustainable and better aligned to the Medway Local Plan. This provides the basis for justifying exceptional circumstances for the release of Green Belt land in this location

This paragraph is simply wrong. Paragraph 2.1.6 states clearly that Sustainability Appraisal found that reasonable alternative growth option without Gravesham's calculation of unmet housing need performed better overall. Exceptional Circumstances have not been justified. Developments on GBCs Green Belts do not mean that Medway Greenbelt would cease to perform its key function of preventing urban sprawl, such development would actually demonstrate the value of Medway Green Belt.

Paragraph 2.5.2

The Council has prepared a Green Belt Review and has identified most parcels of land to the west of Strood as Grey Belt land. Whilst these sites could come forward as individual proposals, there are more benefits from a comprehensive scheme. This provides the basis to justify exceptional circumstances and to deliver sustainable development with the supporting infrastructure.

The Medway Council Green Review belt is flawed and makes incorrect judgements on the value of the Green Belt land to the west of Strood, and this has been highlighted in responses to the Draft Medway Local Plan.

Paragraph 2.5.3

Planning officers from the Council and Gravesham Borough Council have commissioned a landscape-led masterplan to inform strategic site allocation policies for respective local plans. Further work is required through engagement with developers and the finalisation of a landscape-led masterplan which will be the basis for determining planning applications.

Medway Council has refused to share the draft masterplan documents with Medway Residents on the basis of it not being in the public interest (Freedom of Information Request INF004656 / FOI004734) but has shared the draft masterplan with Commercial Developers. This undermines the credibility of the Green Belt Review by Medway Council which has paved the way for the proposed Chapter Views development.

The proposal that Medway Council should continue to collaborate with Commercial Developers while excluding the residents of Strood is undemocratic at best.

Paragraph 2.5.4

Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by the Council and Gravesham Borough Council. This matter is **agreed**.

See comments against paragraph 2.5.3 above.

Section 4.2

Paragraph 4.2.1

Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by the Council and Gravesham Borough Council.

See comments against paragraph 2.5.3 above.

Green Belt Exceptional Circumstances Topic Paper, Submission Document, Medway Council, Regulation 22, December 2025

Chapter 3

Paragraph 3.1.2

Discussions reflected the different stages that each authority was at in preparing their draft Local Plan. Medway Council had received a housing need request from Gravesham Borough Council, which had been considered in the Sustainability Appraisal. Discussions with other authorities reflected the higher housing need that needed to be met.

In the documents “Statement of Common Ground Submission Document, Medway Council, Regulation 22, December 2025” and “Duty to Cooperate Statement, Submission Document, Medway Council, Regulation 22, December 2025” It is clearly stated that Sustainability Appraisal found that reasonable alternative growth option without Gravesham’s calculation of unmet housing need performed better overall. Exceptional Circumstances have not been justified.

Paragraph 3.2.1

The Site Selection topic paper and the Sustainability Appraisal set out how sites were assessed. Sites were rigorously considered and only suitable brownfield and underutilised land were identified for inclusion within the development strategy. Although Medway Council has a strong regeneration agenda and has been successful in delivering urban redevelopment, this alone was not sufficient to meet the development needs over the plan period and the plan’s vision. Consideration of greenfield and grey belt was required, i.e. by following the sequential approach set out in national guidance.

The assertion that Medway Council has been successful in delivering urban regeneration should be substantiated. There are a number of urban sites that have been very slow to progress e.g. former Medway Council offices site in Strood, former Bourne and Hilliers Dairy Site in Rochester, former Rochester Motor Company site in Rochester, development of commercial land at the junction of Strood Hill and Cuxton Road, The slow progress of the multi-year regeneration of Rochester Riverside (planning in 2017 and due for completion in around 2028/29).

Paragraph 3.2.2

The Strood West site allocation performed well in achieving sustainable growth being serviced by the A289, M2 J1 corridor and being on the urban edge of Strood District Centre. Services and facilities would be in

proximity and would be highly accessible and benefit from public transport links. The site area has the potential to deliver a sustainable community with required infrastructure.

This is a misrepresentation of the situation in respect of the Medway Council area. There isn't any existing access from the or A289 or M2 J1 except along existing residential roads many of which are at capacity or totally unsuitable. New access to the proposed developments would need to be via the Gravesham land. As the Gravesham Draft Local Plan is behind the Medway Draft Local Plan on the approval timeline it is not possible to state that access will be available.

Paragraph 5.1.2

Medway's site selection process was iterative and rigorous and included the consideration of discussions with neighbouring authorities on potential cross border sites. It considered the impact of proposed and planned development in neighbouring boroughs on land in Medway, including the functioning of the Green Belt if adjacent land in Gravesham was developed.

Developments on GBCs Green Belt do not mean that Medway Green belt would cease to perform its key function of preventing urban sprawl. GBCs development would demonstrate the value of Medway Green Belt as the result of the proposed cross border developments would be to create an uninterrupted urban landscape from Medway into Gravesham i.e. Urban sprawl. Preventing urban sprawl is a key function of Green Belt.

Paragraph 5.1.7

The topic paper confirms the exceptional circumstances for grey belt release.

The Medway Council Green Review belt is flawed and makes incorrect judgements on the value of the Green Belt land to the west of Strood, and this has been highlighted in responses to the Draft Medway Local Plan.

The exceptional circumstances claimed by Medway Council are a creation of Medway Council as it seeks to justify and facilitate Commercial Developments that are not in the public interest.

Reference A.1.2 Parcel 2: Land North of Rede Court Road

Moderate: This contribution is considered not significant and is therefore grey belt.
Recommendation: Amend Green Belt boundary/release

This is a flawed judgement, that has caused a great deal of public concern. The concern was so great that the Council arranged a well attended public meeting that made the unpopularity of the declassification of Green Belt very clear. It has also been the subject of comments already submitted on the Draft Medway Plan.

Reference A.1.3Parcel 3: Brompton Farm Road

Moderate: This contribution is considered not significant and is therefore grey belt.
Recommendation: Amend Green Belt boundary/release

This is a flawed judgement, that has caused a great deal of public concern. The concern was so great that the Council arranged a well attended public meeting that made the unpopularity of the declassification of Green Belt very clear. It has also been the subject of comments already submitted on the Draft Medway Plan.

Medway Local Plan 2041

Consultation response from Boxley Parish Council relating to new Transport evidence 18.1 and 18.7

Boxley Parish Council and the local residents they represent are deeply concerned by the cumulative impact of large scale development proposals in the Capstone Valley and those already approved at Lidsing within Maidstone District. The following comments relate to the current public consultation regarding new Transport Evidence and specifically documents 18.1 and 18.7.

The existing local Road network consisting of narrow country lanes is totally unsuitable to serve such major proposed development. Furthermore without the timely provision of improved highway Infrastructure there would be an intolerable increase in traffic , safety hazards, noise and pollution in the villages of Boxley and Bredhurst.

It is important to note that additional development in the Capstone Valley relies on the necessary provision of a new East – West link and improvements to the M2 at junctions 3 and 4 as evidenced at the Maidstone Local Plan Hearing in 2022/23.

The transport modelling Forecasting Report B18.1 lacks any credibility because it relies on the inadequate Figure 13 “Concept Plan” (page 273 of the Submission Plan A1) and flawed assumptions in paragraph 4.2.4 .

The recently approved Lidsing SPD provides no certainty that required improvements at M2 Junction 4 will be delivered within the plan period, nor that they would offer adequate capacity if and when completed.

The new 4th arm to M2 junction 4 within the North Down National Landscape has no status in either the Maidstone or Medway Local Plans. The planning application process will be very complicated and “exceptional need” for works within the National Landscape is yet to be proven.

There is no National Highways-approved scheme for the proposed new link road to M2 junction 4. There are serious doubts that the scheme can be delivered within the scheme promoter’s land holding.

At the Maidstone Local Plan Hearing in 2022/23 National Highway raised concerns about the proximity of the new bridge structure to the live M2 running lanes. Three years on and detailed drawings have yet to be produced showing that the connection to Maidstone Road can satisfactorily provided to the approval of NH.

Detailed Observations

- The uncertainty regarding the delivery of improvements at M2 junction 4 is confirmed by the need for the development of an “Interim Scheme” (B18.7 paragraph 13.3) involving various slip road improvements but no direct connection to the proposed East -West link or the M2 at junction 4. This approach was specifically ruled out by the Maidstone Local Plan Inspector in his decision letter dated 8 March 2024 (paragraphs 161 and 162 on page 43). He also placed much importance on the early delivery of the East – West link. (paragraphs 166,169,170 and 176 and Main Modifications)

- The proposed Interim scheme (B18.7 13.3) involving minor changes to M2 junction 4 can not be assessed in isolation. Without the new East-West link to M2 junction 4 there would be an intolerable impact on local roads including Hempstead Road, the residential section of Chapel Le, Hempstead Valley Drive, Sharsted Way and its junction with the A278.
- There would be similar issues with traffic running through the villages of Bredhurst and Boxley and unsuitable residential including Clandon Road and Gleaming Wood Drive to access M2 at junction 3 via Lordswood Lane and Walderslade Woods Road.

There are also serious concerns about the way that the proposed housing allocations LW4 & LW8 have been modelled in the B18.1 (Forecasting Report) and B18.7 (Junction and Modelling Mitigation Report).

It is important to stress that the design and model outputs for M2 junction 4 originate from a third party – Charles and Associates Consultants – acting on behalf of Capstone Valley scheme promoters (B18.1 page 129 - paragraph 8.3.8). This input cannot therefore be regarded as unbiased.

- The number of houses assumed for the Lidsing Development (1300) – (B18.1 Table 3-3 page 24) is incorrect, the actual number should be 2000.
- The assumptions for the Lidsing access arrangements B18.1 page 44 are either inaccurate or impractical. They are also inconsistent with Figure 4.3 on page 45. Closures of Lidsing Road and Westfield Sole Road (near the Harrow PH) are clearly impractical without consideration of essential access or any indication of the proposed development layout other than the main spine road.
- The 6 bullet points on page 44 are not accurately reflected on Figure 4.3 (page 45).
- The assumptions in B18.1 Table 5-4 page 54 – about the network connections for sites LW4 and LW8 by way of simple priority junctions is clearly inappropriate. Shawstead Farm Lane, Ham Lane and Capstone are single track rural lanes and not in any way suitable to serve such a major development.
- Paragraph 13.2 in B18.7 (The full scheme) presupposes that the new link to M2 junction 4 and the new bridge over the motorway are in place. There is no certainty of this.
- Any improvement scheme for M2 at junction 4 needs to be considered in its entirety including the problematic connection to Maidstone Road and the Lidsing East- West Link.

Conclusion

Boxley Parish Council is concerned that latest Transport Evidence does not show that further development in the Capstone Valley can be safely accommodated on the Local or Strategic Highway Networks. The proposed housing allocations LW4 and LW 8 are therefore unsound and should be removed.

1. Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Catesby Strategic Land Limited ("Catesby") to prepare representations in respect of the Medway Local Plan 2041 supporting evidence documents consultation (herein referred to as the Evidence Base Consultation).
- 1.2 In preparing these representations, due regard has been had to Government policy set out in the Framework 2024 and accompanying Planning Practice Guidance ("PPG")
- 1.3 Catesby has previously made representations at Regulation 18 and 19 stage. Catesby has also made representations to the Medway Development Contributions SPD, which is material to considerations about the Infrastructure Delivery Plan and The Developers Contributions guide, which is part of the revised evidence base for this consultation.
- 1.4 These representations should be read in conjunction with the previous representations made in respect of the Regulation 19 consultation version of the Plan.

2. General Comments and Legal Framework

- 2.1 The legislative requirements for plan making are contained in the Planning and Compulsory Purchase Act 2004 (as amended) [PCPA] and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) [the Regulations]. Some guidance on procedure is also provided in the Planning Practice Guidance [PPG] chapter on Plan-making.
- 2.2 Paragraph 31 of the Framework is clear that the preparation of all policies should be underpinned by relevant and up-to-date evidence. The evidence should be adequate and proportionate.
- 2.3 A plan is considered sound when it is consistent with Paragraph 36 of the Framework 2024, i.e. it is positively prepared, justified, effective and consistent with national policy. This consultation focuses on the evidence base and there these representations consider whether the documents contribute to a justified and sound plan.
- 2.4 This consultation follows the publication by Medway Council of new and revised evidence base documents to support the policies in the Medway Local Plan 2041, submitted in late 2025 for Examination.
- 2.5 This representation focuses on the following evidence base documents:
- B2 Infrastructure Delivery Plan (December 2025) (updated)
 - B4 Developer Contributions and Obligations Guide (December 2025) (updated)
 - B22.1 Site Selection Topic Paper (new)
 - B22.5 Housing Delivery Topic Paper (New)
- 2.6 These documents are dealt with in turn in the section below.

3. Evidence Base Documents commentary

B2 Infrastructure Delivery Plan (December 2025) (updated)

- 3.1 The Medway Infrastructure Delivery Plan (December 2025) (B2) is an updated version of the document that was available at the Regulation 19 stage. It was anticipated that this update would provide significantly greater clarity regarding the infrastructure required to support the Local Plan, including the proposed delivery mechanisms, timing, costs, and identified funding sources. However, as set out in the representations below, Catesby remains concerned that the Plan continues to rely heavily on developer funding without sufficient justification or evidence. In addition, there remains a lack of clear information regarding funding sources and delivery arrangements for a number of key infrastructure projects.

Rail

- 3.2 Funding sources for rail projects are shown as developer contributions, if additional funding is required for early years subsidies on top of other sourced national funding. There is no clarity on the scale of developer funding required. The scale and geographical catchment for such funding streams are critical. Concern is raised on how this may affect site viability for sites in close proximity to stations, if for example residential schemes are required to contribute in such areas as Chatham where redevelopment is scheduled by National Rail.

Road

- 3.3 The Blue Bell Hill Improvement scheme has an estimated cost of £250million and is critical to residential and commercial land release in Medway. The bid has not yet been secured to cover 85% of the scheme's costs, the remaining 15% will need to come from developer contributions. The developer contribution proportion equates to £37,500,000. The Council is explicit that funding and delivery mechanisms are unknown.

Education (including early years)

- 3.4 The total funding required for the proposed projects outlined for early years in the IDP are unknown.

Schools

- 3.5 The IDP states it requires a significant increase in school space provision, which would require at least:
- 7 further primary school expansions
 - 7 new primary schools
 - At least 3 new secondary schools
 - Expansion of existing facilities where bulge years are anticipated.
- 3.6 The total funding required for the proposed projects outlined above is estimated at approximately £315m. The anticipated s106 receipt from the proposed housing is estimated to only be £151m. Funding mechanisms, which could include local authority borrowing, are still unknown.

Health and social care

- 3.7 Within these sections of the IDP, the Council acknowledges that assumptions have been made regarding funding streams for health and social care infrastructure. However, many of the identified infrastructure requirements arise from longstanding and historic deficiencies within Medway, rather than being directly attributable to the additional residential population proposed through the Local Plan.
- 3.8 Catesby is concerned that, in the absence of clearly identified and secured funding streams, mechanisms such as significantly increased Section 106 contributions could be used to address these existing funding shortfalls. Similar concerns were raised in response to the Council's consultation on the Developer Guide to Contributions SPD, a copy of which is included at Appendix X for ease of reference. Notably, the draft SPD proposes a substantial increase in per-dwelling health contributions.
- 3.9 The Council must clearly distinguish between infrastructure that is necessary to mitigate the impacts of development proposed through the Local Plan and wider infrastructure investment required to address existing deficiencies. The IDP should not be treated as a comprehensive "shopping list" of infrastructure aspirations, but rather as evidence of infrastructure that is necessary, directly related, and proportionate to support planned growth.
- 3.10 In Catesby's view, the Council is seeking to place an unreasonable financial burden on new development by requiring it to fund infrastructure deficits that should instead be addressed through alternative funding mechanisms and statutory responsibilities, rather than through the planning system and the Local Plan.

Conclusion on B2

- 3.11 The Infrastructure Delivery Plan does not provide sufficient certainty that the infrastructure required to support the Local Plan is deliverable or appropriately funded. Significant uncertainty remains regarding the scale of developer contributions, the availability of alternative funding sources, and the delivery mechanisms for key infrastructure. The Council must clearly distinguish between infrastructure required to mitigate the impacts of planned development and investment needed to address existing infrastructure deficits. Without this distinction, there is a real risk that new development will be expected to fund historic shortcomings, placing an unreasonable burden on development, undermining site viability, and calling into question the effectiveness and deliverability of the Local Plan.

B4 Developer Contributions and Obligations Guide (December 2025) (updated)

- 3.12 In May 2026, Medway Council held a consultation on a very similar (if not the same) version of this document for the Development Contributions and Obligations Guide SPD. Catesby wrote in objection to this SPD alongside the Housebuilders Federation. These concerns are set out in full in their representation, which I provide in Appendix 1.
- 3.13 The principal concern of this document is that it introduces blanket financial burdens that are not demonstrably necessary to make development acceptable in planning terms. It is clear from the IDP that the Council are seeking to overcome historic and chronic shortfalls in national funding by seeking developer contributions. These developer contributions are unknown because the project funding detail has not yet been agreed or known.

- 3.14 This Developer Contributions and Obligations Guide in support of the new local plan appears to rely on to rely on historic figures, indicative assumptions, or standardised rates without robust justification or clear evidence of direct linkages between development impacts and the contributions sought. This is inconsistent with national policy and guidance, which requires planning obligations to be necessary, directly related to development, and fairly and reasonably related in scale and kind.
- 3.15 Catesby have particular concern over the following matters in the Developer Contributions and Obligations Guide

Cultural Services

- 3.16 Catesby challenges the proposed contributions towards cultural services, community infrastructure, and libraries, arguing that the Council has not provided sufficient, up-to-date evidence to justify the standard per-dwelling charges. The Council has not demonstrated that the development would place additional pressure on existing facilities, identified which facilities would be affected, or explained how contributions would be spent. Catesby contends that these contributions do not meet the legal tests of necessity and proportionality under the CIL Regulations and should therefore be removed unless robustly evidenced. It also argues that any increased demand for library services should be funded through council tax, with any site-specific infrastructure needs identified and justified through the Local Plan rather than a blanket charge on all new homes.

Education

- 3.17 Catesby supports the HBF's objections to the proposed education contributions, arguing that they are based on outdated pupil yield evidence and fail to reflect current demographic trends, including declining fertility rates. It also considers the Council's methodology, which is based on dwelling numbers rather than bedrooms, to be unsupported and likely to overestimate demand, meaning the proposed contributions are not adequately justified or compliant with planning policy.

Health and social care

- 3.18 Catesby objects to the proposed standardised NHS contribution, arguing that the ICB's guidance requires contributions to be assessed on a site-specific basis rather than through a blanket charge. It also supports the HBF's view to the SPD consultation that new development should not fund existing healthcare infrastructure deficits and that any contributions must be fully justified and comply with the legal tests for planning obligations. This relates to concerns raised in regard to the IDP in which the Council is seeking to place an unreasonable financial burden on new development by requiring it to fund infrastructure deficits that should instead be addressed through alternative funding mechanisms and statutory responsibilities, rather than through the planning system and the Local Plan.

Heritage buildings, Public Realm and town centre enhancement

- 3.19 Catesby considers that the proposed heritage buildings, public realm and town centre enhancement contributions lack a clear policy basis and have not been shown to meet the statutory tests for planning obligations. While public realm improvements are supported in principle, there is insufficient evidence that they are necessary, directly related to new development in the Local Plan, or required to mitigate its impacts, and the requirement should be removed unless properly justified. General improvements to buildings in the council's portfolio however, are not supported.

- 3.20 Overall, Catesby considers that the Developer Contributions and Obligations Guide introduces a range of standardised financial requirements that have not been sufficiently evidenced or justified. The Council has not demonstrated clear and direct relationships between the impacts arising from individual developments and the contributions sought, nor has it provided robust evidence that these obligations are necessary to make development acceptable in planning terms.
- 3.21 The Guide appears to place a disproportionate financial burden on new development in order to address wider infrastructure funding pressures and historic deficits, rather than securing contributions that are genuinely required to mitigate the impacts of development. This approach is inconsistent with the statutory tests for planning obligations and national planning policy, which require obligations to be necessary, directly related to the development, and fairly and reasonably related in scale and kind.
- 3.22 Catesby therefore considers that the Developer Contributions and Obligations Guide should be amended to remove blanket or unsupported contributions and ensure that any future obligations are based on robust evidence, clear infrastructure requirements, and a demonstrable connection between development impacts and the mitigation measures proposed.

B22.1 Site Selection Topic Paper (new)

- 3.23 The Site Selection Topic Paper provides no meaningful additional clarity beyond the information already presented within the Sustainability Appraisal (SA). It fails to demonstrate how the site selection process has been undertaken in accordance with, or actively supports, the Council's development strategy. In particular, there is no clear explanation of why the selected sites are the most appropriate locations to deliver the spatial strategy, nor any evidence that the proposed allocations will achieve the strategic objectives of the Plan.
- 3.24 This is not a matter that can be resolved through the SA alone and requires a clear and transparent justification within the site selection evidence base. The Topic Paper does not provide sufficient evidence to demonstrate that officer decisions to allocate or reject sites were robust, consistent, or based on a transparent methodology. The absence of a clear audit trail undermines confidence in the conclusions reached.
- 3.25 Furthermore, the document fails to adequately address site deliverability. There is insufficient evidence regarding landowner intentions, promoter engagement, infrastructure constraints, delivery expectations, or the likelihood that the proposed sites can realistically come forward within the Plan period. In particular, the absence of evidence of discussions with major promoters and key stakeholders represents a significant gap in the evidence base.
- 3.26 Without this information, it is not possible to determine whether the allocated sites are genuinely deliverable or whether the site selection process has resulted in a justified and sound strategy. The Council should provide further evidence to demonstrate that the selected sites are appropriate, available, achievable, and capable of contributing towards the delivery of the Plan's identified needs.

B22.5 Housing Delivery Topic Paper (New)

- 3.27 Neame Sutton Limited has prepared a detailed Technical Report Update that examines the Council's Housing Need and Supply in the context of the information contained within the Housing Delivery Topic Paper published in December 2025 i.e. after the Regulation 19 consultation took place. The Technical Report Update is attached at **Appendix A**.
- 3.28 In summary the Technical Report Update confirms the following:
1. The Council has not set the housing requirement correctly and needs to plan for more homes;
 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 **-3,628 dwellings**;
 4. When Annex 2 and Paragraph 75 are applied and the correct housing requirement the shortfall rises to **-7,628 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.

4. Summary and Conclusion

- 4.1 Overall, the representations set out above demonstrate that the Plan as submitted remains unsound and that the following changes are required in order for the Plan to be found sound:

B2 – Infrastructure Delivery Plan:

- The IDP needs to be revisited to address the uncertainty in the approach taken and to clearly distinguish between infrastructure required to mitigate impacts of planned development and investment needed to address existing infrastructure deficits.

B4 – Developer Contributions and Obligations Guide:

- Amendment to the guide to address the shortcomings identified in these representations specifically in relation to: Cultural Services, Education, Health and Social Care, Heritage Buildings and, Public Realm and Town Centre Enhancement.

B22.1 – Site Selection Topic Paper:

- The same flaws identified by Catesby in its Regulation 19 Representations are present in this Topic Paper and need to be addressed as previously identified; and,
- In essence the Topic Paper does not address the complete lack of evidence required to demonstrate why sites have been selected and others dismissed.

B22.5 – Housing Delivery Topic Paper:

- **Change 1** – The DfC must be revisited and proper ongoing negotiation undertaken with neighbouring authorities to correctly identify the level of unmet need;
- **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 **1,886 dpa**;
- **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);
- **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 3,600 dwellings** to ensure that the minimum LHN can be met at the end of the Plan period.
- **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 7,600 dwellings**.

- 4.2 As confirmed in Catesby's Regulation 19 Representations submitted to the Council in July 2025 Catesby is actively promoting its land interest East of Stokes Road, Allhallows for circa 350 no. dwellings. The site is available, achievable and deliverable and is currently the subject of a live Outline Planning Application (Application Ref: MC/26/0001) that is being progressed via a PPA with the Council's Development Management team and is at an advanced stage. This site (LAA Refs: AS18 and AS22) is therefore ready and able to make a meaningful contribution to the Council's housing supply in the early years of the Plan period and particularly in the first five years.

- 4.3 Without the above changes and additional work together with those changes and areas of additional work identified by Catesby in the Regulation 19 Representations the Plan as submitted cannot be found Sound.
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Appendices:

Appendix 1	Assessment of Council's draft housing allocations (Tables A and B) (July 2025)
Appendix 2	Trajectory 1 - Council's position on supply and requirement with the application of a 20% buffer
Appendix 3	Trajectory 2 – Neame Sutton position on supply and Council's position on supply with the application of a 20% buffer
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 an Update to the Technical Report prepared in July 2025 to address the matters of Housing Need and Land Supply in relation to the Regulation 19 consultation version of the Medway Local Plan 2041 and in particular the publication by the Council of its Housing Delivery Topic Paper in December 2025 ("the Topic Paper").
- 1.2 This report sets out an update to 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 In order to assist the Inspector's consideration of Catesby's position on the matters of the housing requirement and supply this update has been prepared in a format that replaces the report previously submitted in July 2025 as part of Catesby's Regulation 19 Representations. The analysis has been brought up-to-date to reflect the Council's more recent evidence set out in the Topic Paper that is the subject of the current consultation.
- 1.4 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

- 1.5 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.
- 1.6 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.

- 1.7 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.
- 1.8 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 year⁶. The Council has now confirmed this will be its position for the purposes of the Examination⁷.
- 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**. The Council has now confirmed this in the Topic Paper⁸.
- 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 The Topic Paper however seeks to update this position to extend the Plan period to 16 years 2025 – 2041⁹, which results in a total LHN of 26,176 dwellings.
- 2.15 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.

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

⁷ Paragraph 5.1.1. on Page 13 of the Housing Delivery Topic Paper December 2025 confirms

⁸ Paragraph 3.1.3 on Page 6 of the Housing Delivery Topic Paper December 2025

⁹ The Council notes that this change would need to form a Main Modification to the Submitted Plan in due course

2.16 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 **26,176 dwellings**.

(iii) Consideration of Factors that Indicate Need for an Uplift

2.17 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.

2.18 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 period¹⁰.

2.19 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.

2.20 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.

2.21 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)

2.22 The Council's approach has therefore failed to grapple with the requirements of the Framework 2024 and the PPG.

¹⁰ Paragraph 040 Reference ID: 2a-040-20241212 Revision Date: 12 12 2024 – Housing and Economic Needs section of PPG

- 2.23 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 \$106 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.
- 2.24 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

- 2.25 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.
- 2.26 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.
- 2.27 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.
- 2.28 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.
- 2.29 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.

- 2.30 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 needs¹¹.
- 2.31 Swale has also commissioned a report by AECOM to look at whether a case exists to progress a housing requirement below the LHN¹². 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 for¹³.
- 2.32 Unmet need arising from these two authorities is therefore more likely than not and the Council has failed to grapple with it.
- 2.33 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.
- 2.34 No consideration of unmet need arising from these locations has been given by the Council.
- 2.35 Section 2.3 of the Topic Paper contains 3 paragraphs on the matter of unmet need and does nothing to address the matters set out above, which is wholly inadequate. Even with the late production of the Topic Paper that provided the Council with a further opportunity to address the matter of unmet need it has simply concluded that unmet need should not form part of the minimum housing requirement for the Plan.

¹¹ 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>

¹² Housing Targets Exceptional Circumstances Study – September 2024 - https://swale.gov.uk/_data/assets/pdf_file/0009/484794/Housing_Targets_Exceptional_Circumstances_Study_2024.pdf

¹³ 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

(v) The Minimum Housing Requirement

- 2.36 The starting point of an LHN equating to 1,636 dpa is established and the Council has correctly calculated this.
- 2.37 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.
- 2.38 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 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.
- 2.39 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 (2025-2041)	Dwellings	Dpa
Local Housing Need (LHN)	26,176	1,636
Minimum Adjustment for Unmet Need and other factors such as infrastructure delivery	4,000	250
TOTAL Minimum Housing Requirement (2025-2041)	30,176	1,886

- 2.40 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 authority¹⁴.
- 2.41 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.

¹⁴ Paragraph 5.3.12 on Page 27 of the SA (June 2025)

- 2.42 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.

(vi) Is a Stepped Trajectory Justified?

- 2.43 The Topic Paper has introduced the concept of a stepped trajectory and Section 3.2 of the document seeks to justify its use for the Plan.
- 2.44 In essence the Council's approach is that a stepped trajectory is necessary along with the application of the 'Liverpool' method of dealing with any shortfall because of its past poor performance and the fact that the Council's spatial strategy in the Plan is reliant upon 12 no. strategic sites that will take time to deliver.
- 2.45 What the above demonstrates is that the application of a stepped trajectory and the 'Liverpool' method is intended to mitigate its past failings and to 'fix' the flaws in its spatial strategy. Rather than grappling with the fundamental issue of allocating enough sites of the right size in the right locations to ensure a consistent supply of new homes throughout the Plan period the Council has opted for the easy route of a stepped trajectory. This does not amount to a Sound approach.
- 2.46 On the matter of the 'Liverpool' method to dealing with any shortfall the Framework 2024 and corresponding PPG are clear that this should not be used. In fact the PPG confirms only the use of the 'Sedgefield' method when dealing with shortfall¹⁵. The Council should **not** therefore be seeking to apply the Liverpool method to any shortfall.
- 2.47 Given that the Council has chosen to remove allocations from the Plan between the Regulation 18 and Regulation 19 consultation stages there is absolutely no justification for the use of a stepped trajectory simply to correct the flaws in the spatial strategy now being progressed.
- 2.48 Equally, the Council's past poor housing delivery performance should not be used as a basis to support a stepped trajectory. Whilst the information contained in Table 1 on Page 6 of the Topic Paper appears quite damning in terms of the Council's past poor performance since 2020 that is reflective of the fact the Council has not had an

¹⁵ Housing Supply and Delivery section of PPG - Paragraph: 022 Reference ID: 68-031-20190722 Revision date: 22 07 2019

up-to-date Local Plan during that period. Clearly, the adoption of this Plan would rectify that situation.

- 2.49 In Catesby's view the use of a Stepped Trajectory is wholly inappropriate and unnecessary in the case of Medway and certainly is not reflective of the key Government policy imperative to significantly boost the supply of housing now.
- 2.50 Furthermore, the approach the Council has taken with its proposed stepped trajectory actually only assists it in the final 5 years of the Plan period, which does not reflect the reasoning provided by the Council for introducing it i.e. that its 12 no. strategic sites will take time to deliver.
- 2.51 For all of these reasons the Plan should be based on a flat trajectory.

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...'¹⁶

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%

¹⁶ 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 **5,235 dwellings** (based on the Council's proposed housing requirement, or an additional **6,035 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 particular¹⁷. Advice is

¹⁷ 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 developable¹⁸.

- 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 2024¹⁹.
- 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 2025 to be delivered during the plan period	A
Large Sites permitted but not allocated	B
Small Sites permitted (less 17% 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.

¹⁸ Paragraphs 010 – 011 Reference ID: 68-010-20190722 and 68-011-20190722 Revision date: 22 07 2019

¹⁹ 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 year²⁰;

²⁰ 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 In addition, we are currently in a period of extreme uncertainty both in terms of global events such as the war in Iran and also nationally in terms of the political landscape. Such uncertainty leads to a decrease in confidence in the market that further impacts on the delivery of windfalls sites in particular.

3.23 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.

3.24 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 17% (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
1703	1090	-613

Draft Allocations:

3.25 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.

- 3.26 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.
- 3.27 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.
- 3.28 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.
- 3.29 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.
- 3.30 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.
- 3.31 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
21,706	18,540	-3,166

(iii) Neame Sutton Assessment of Supply and Trajectory

Overall Housing Supply for the Proposed Plan Period:

- 3.32 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 2025	2489	2489	0
Large Sites Permitted but not Allocated	238	238	0
Small Sites Permitted with 17% Lapse Rate Applied	190	190	0
Windfall Allowance	1703	1090	-613
Proposed Housing Allocations	21706	18540	-3166
TOTAL Supply	26326	22548	-3628

- 3.33 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 **-3,628 dwellings** lower than the Council has identified.
- 3.34 Even if the Council's position is correct it generates a nominal surplus of only **150 dwellings**, which is less than 1% of the total minimum housing requirement set out in the draft Plan²¹. 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).
- 3.35 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.
- 3.36 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 **-3,628 dwellings (-**

²¹ Noting that this is reduced from the surplus of 203 dwellings identified by the Council at the Regulation 19 consultation stage

14%) 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 **-7,628 dwellings (-25%)**.

- 3.37 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:

- 3.38 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.
- 3.39 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.
- 3.40 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 4.53 years in 2029/30, which is poor.
- 3.41 The position when the correct housing requirement is applied is materially worse as Trajectory 3 in **Appendix 4** demonstrates.
- 3.42 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 2025, which equates to only 2.92 years.
- 3.43 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:

3.44 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 **-3,628 dwellings**;
4. When Annex 2 and Paragraph 75 are applied and the correct housing requirement the shortfall rises to **-7,628 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 1,886 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 3,600 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 7,600 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 2026)

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	44															44
	AS10	B	5															5
	AS11	B				10												10
	AS25	B	34															34
	AS28	B						9										9
	CCB1	A	12															12
	CCB3	A											13					13
	CCB4	B		61														61
	CCB7	A											9					9
	CCB8	A	164															164
	CCB12	B				18	6											24
	CCB15	B						22	22	16								60
	CCB19	A		13														13
	CCB20	A			45	45	45											135
	CCB21	A			14													14
	CCB24	A								9								9
	CCB27	B						18	2									20
	CCB30	B											18	3				21
	CCB31	A				18	22											40
	CCB37	B						44	44	44	44	24						200
	CCB39	B															24	24
	CCB41	A								7								7
	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						60	60	3								123
	FP12	B											18	18	18	16		70
	FP14	A		7														7
	FP16	A	6															6
	FP25	B											44	44	33			121
	GN3	B						44	44	44	44							176
	GN6	B						83	83	83	83	83	83	2				500
	GN8	B				17												17
	GS2	B											18	18	9			45
	GS4	A		24														24
	GS7	A	14															14
	GS14	A		6														6
	GN15	B						101	101	101	101	101	101	101	101	101	101	1010
	GS19	A					57											57
	GS23	A	5															5
	GS26	B				14												14
	GS35	B											12					12
	HHH5	B				18	18	14										50
	HHH6	B					83	83	83	83	83	83	52					550
	HHH8	B		70	70	70	70	70	70	30								450
	HHH11	B						60	60	60	60							240
	HHH12	B						188	188	188	188	188	188	188	188	188	108	1800
	HHH15	A	2															2
	HHH22 & 31	B						188	188	188	188	188	188	188	188	188	188	1880
	HHH24	B				18	18	18	18	13								85
	HHH25	A	50	50														100
	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	8	42	42	42							44	44	44	44	20	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	86	233	231	214	30											794
	LW7	A		100	100	100	100	50										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				18		15										33
	RN22	A											8					8
	RN23	A	14	61														75
	RN24	A	9															9
	RN25	A				5												5
	RN29	B				14												14
	RN28	A	48	14														62
	RN30	B		40	40	10												90
	RN31	B		40	40													80
	RN32	A	16															16
	RWB2	A					36											36

	RWB11	B	5															5				
	RWB12	B						3										3				
	RWB19	A	58					59	59	60	60								296			
	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	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	6																6			
	SNF20	B	15															15				
	SNF23	A						8										8				
	SNF24	A	7																7			
	SNF27	A	13																13			
	SNF30	B						9										9				
	SNF31	A	8																8			
	SNF32	A	6																6			
	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	40	13																53		
	SR25	A	46	45	45	45												181				
	SR47	A																0				
	SR48	B																0				
	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	6																6			
	T3	A	19																19			
	W3	A																0				
	W4	B						5										5				
	W7	A	21																21			
TOTAL SUPPLY			904	1305	1092	1420	1455	2422	2040	1941	1484	1522	1483	1454	1070	1198	812	21602				

Table B - Proposed Site Allocations - Neame Sutton Adjustments

Proposed Site Allocations			Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Commentary	
Address	Reference	Cat A/B	Years 1-5					Years 6-10					Years 11-15								
			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	44																	44	
	AS10	B	5																	5	
	AS11	B				10														10	
	AS25	B	34																	34	
	AS28	B							9											9	
	CCB1	A	12																	12	
	CCB3	A												13						13	
	CCB4	B		61																61	
	CCB7	A											9							9	
	CCB8	A	164																	164	
	CCB12	B				18	6													24	
	CCB15	B							22	22	16									60	
	CCB19	A		13																13	
	CCB20	A			45	45	45													135	
	CCB21	A			14															14	
	CCB24	A								9										9	
	CCB25	B							18	2										20	
	CCB27	B											18	3						21	
	CCB30	B				18	22													40	
	CCB31	A							44	44	44	44	24							200	
	CCB37	B															24			24	
	CCB39	B								7										7	
	CCB41	A							44	44	44	18								150	
	CCB49	B							18	18	13									49	
	CHR14	B				18	10													28	
	FP1	B							18	10										28	
Former University College for the Creative Arts			Application Pending: Ref: MC/25/0204 - Objection by Historic England 09 May 2025 regarding unresolved impact on SAM (Fort Pitt). Not currently deliverable. Therefore moved out of 5-year supply.																		
	FP6	B							102											102	
	FP10	B		139																139	
	FP11	B							60	60	3									123	
	FP12	B												18	18	18	16			70	
	FP14	A		7																7	
	FP16	A	6																	6	
	FP25	B												44	44	33				121	
	GN3	B							44	44	44	44								176	
Pier Road, Gillingham			No planning history or even a live planning application. Heavily contaminated site containing Gas Holders. No evidence in LAA of deliverability from promoter. LAA even confirms the site has viability issues affecting delivery. Does not meet deliverability test. Removed from 5-year period.																		
	GN6	B								100	100	100	100	100						500	
	GN8	B				17														17	
	GS2	B												18	18	9				45	
	GS4	A		24																24	
	GS7	A	14																	14	
	GS14	A		6																6	
Gillingham North	GN15	B							83	83	83	83	83	83	2					500	
	GS19	A						57												57	
	GS23	A	5																	5	
	GS26	B				14														14	

	GS35	B						12							12				
	HHH5	B	1818					14							50				
Land off Chattenden Lane, Chattenden	HHH6	B						40	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	707070					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	2															2	
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	1818					18	18	13						85			
	HHH25	A	50	50														100	
Land to the East of High Halstow	HHH26	B						30	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	1818					19										55	
	HHH32	B						3										3	
	HHH33	B	8	42	42	42						44	44	44	44	20	330		
	HHH41	B						18	7								25		
	HW3	B						44	31								75		
	HW6	A	1818					18	18	16						88			
	HW11	B	1818					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	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	86	233	231	214	30											794	
	LW7	A	100	100	100	100	50											450	
Land West of Capstead Road and East of Shawstead Road	LW8	B						50	125	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	18					15										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 - Sedgefield 20%



As at: 04-Jul-26

Supply Sources	Plan Period		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
			Years 1-5					Years 6-10					Years 11-15					
	Cat A/B	2025/26	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	691	388	442	387	243	100	130	100	8								2489
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238
Small Sites Permitted with 17% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191
Total from Proposed Allocations		104	904	1305	1092	1420	1455	2422	2040	1941	1484	1522	1483	1454	1070	1198	812	21706
Windfall Allowance					131	131	131	131	131	131	131	131	131	131	131	131	131	1703
TOTAL SUPPLY		841	1422.55	1912.604	1679.45	1798.98	1690.83	2683	2271	2080	1615	1653	1614	1585	1201	1329	950.47	26327
																		0
Requirement		1636	1636	1636	1636	1636	1636	1963	1963	1963	1963	1963	1309	1309	1309	1309	1309	26176
Annual Shortfall/Surplus		-795	-213	277	43	163	55	720	308	117	-348	-310	305	276	-108	20	-359	151
Cumulative Shortfall/Surplus		-795	-1009	-732	-689	-526	-471	249	557	674	326	16	321	597	489	509	151	
Base 5 Year Requirement		8180	8180	8507	8834	9161	9488	9815	9161	8507	7853	7199	6545	5236	3927	2618	1309	
Shortfall/oversupply (Sedgefield)		-795.4	-1008.8	-732.2	-688.7	-525.8	-470.9	249.1	557.1	674.1	326.1	16.1	321.1	597.1	489.1	509.1	150.5	
5 Year Requirement with Shortfall/oversupply		8975.4	9188.8	9239.2	9522.7	9686.8	9958.9	9565.9	8603.9	7832.9	7526.9	7182.9	6223.9	4638.9	3437.9	2108.9	1158.5	
Adjuste 5 Year Requirement with 20% Buffer		10770.4	11026.6	11087.0	11427.3	11624.1	11950.7	11479.1	10324.7	9399.5	9032.3	8619.5	7468.7	5566.7	4125.5	2530.7	1390.2	
Adjusted Annual Requirement (5yr)		2154.1	2205.3	2217.4	2285.5	2324.8	2390.1	2295.8	2064.9	1879.9	1806.5	1723.9	1493.7	1113.3	825.1	506.1	278.0	
5 Year Supply		7654.234	8504.414	9764.864	10123.26	10523.81	10339.83	10302	9233	8547	7668	7382	6679.47	5065.47	3480.47	2279.47	950.47	
Supply in Years		3.55	3.86	4.40	4.43	4.53	4.33	4.49	4.47	4.55	4.24	4.28	4.47	4.55	4.22	4.50	3.42	

Surplus/Shortfall Against Plan Requirement As a %		
	151	1%

- Notes:
- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
 - 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025
 - 3 Sedgefield 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 requirement with the application of a 20% buffer



Housing Trajectory 2 - NEAME SUTTON POSITION on Supply - Sedgefield 20% and 2025 based Std Method

As at: 04-Jul-26

	Plan Period	0	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						
	Cat A/'b	2025/26	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	691	388	442	387	243	100	130	100	8								2489	
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238	
Small Sites Permitted with 15% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191	
Total from Proposed Allocations		104	772	1065	787	995	867	1622	1530	1851	1542	1552	1409	1389	1055	1173	827	18540	
Windfall Allowance								109	109	109	109	109	109	109	109	109	109	1090	
TOTAL SUPPLY		841	1291	1673	1243	1243	972	1861	1739	1968	1651	1661	1518	1498	1164	1282	943.47	22548	
Requirement		1636	1636	1636	1636	1636	1636	1963	1963	1963	1963	1963	1309	1309	1309	1309	1309	26176	
Annual Shortfall/Surplus		-795.35	-345.45	36.604	-392.55	-393.02	-664.17	-102	-224	5	-312	-302	209	189	-145	-27	-366	-3628	
Cumulative Shortfall/Surplus		-795	-1141	-1104	-1497	-1890	-2554	-2656	-2880	-2875	-3187	-3489	-3280	-3091	-3236	-3263	-3628		
Base 5 Year Requirement		8180	8180	8507	8834	9161	9488	9815	9161	8507	7853	7199	6545	5236	3927	2618	1309		
Shortfall/oversupply (Sedgefield)		-795	-1141	-1104	-1497	-1890	-2554	-2656	-2880	-2875	-3187	-3489	-3280	-3091	-3236	-3263	-3628		
5 Year Requirement with Shortfall/oversupply		8975.4	9320.8	9611.2	10330.7	11050.8	12041.9	12470.9	12040.9	11381.9	11039.9	10687.9	9824.9	8326.9	7162.9	5880.9	4937.5		
Adjuste 5 Year Requirement with 20% Buffer		10770.4	11185.0	11533.4	12396.9	13260.9	14450.3	14965.1	14449.1	13658.3	13247.9	12825.5	11789.9	9992.3	8595.5	7057.1	5925.0		
Adjusted Annual Requirement (5yr)		2154.1	2237.0	2306.7	2479.4	2652.2	2890.1	2993.0	2889.8	2731.7	2649.6	2565.1	2358.0	1998.5	1719.1	1411.4	1185.0		
5 Year Supply		6290	6421	6992	7058	7783	8191	8880	8537	8296	7492	7123	6405	4887	3389	2225	943		
Supply in Years		2.92	2.87	3.03	2.85	2.93	2.83	2.97	2.95	3.04	2.83	2.78	2.72	2.45	1.97	1.58	0.80		

Surplus/Shor As a %
-3628 -14%

Notes:

- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
- 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025 and adjusted to reflect Annex 2 test of Deliverability and Paragraph 75 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: 04-Jul-26

	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	691	388	442	387	243	100	130	100	8								2489
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238
Small Sites Permitted with 15% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191
Total from Proposed Allocations		104	772	1065	787	995	867	1622	1530	1851	1542	1552	1409	1389	1055	1173	827	18540
Windfall Allowance								109	109	109	109	109	109	109	109	109	109	1090
TOTAL SUPPLY		840.65	1290.55	1672.604	1243.45	1242.98	971.83	1861	1739	1968	1651	1661	1518	1498	1164	1282	943.47	22548
Requirement		1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	30176
Annual Shortfall/Surplus		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	-7628
Cumulative Shortfall/Surplus		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	
Base 5 Year Requirement		9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	7544	5658	3772	1886	
Shortfall/oversupply (Sedgefield)		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	
5 Year Requirement with Shortfall/oversupply		10475.4	10025.5	9643.4	10072.6	10073.0	10344.2	9455.0	9577.0	9348.0	9665.0	9655.0	9798.0	7932.0	6380.0	4376.0	2828.5	
Adjuste 5 Year Requirement with 20% Buffer		12570.4	12030.5	11572.1	12087.1	12087.6	12413.0	11346.0	11492.4	11217.6	11598.0	11586.0	11757.6	9518.4	7656.0	5251.2	3394.2	
Adjusted Annual Requirement (5yr)		2514.1	2406.1	2314.4	2417.4	2417.5	2482.6	2269.2	2298.5	2243.5	2319.6	2317.2	2351.5	1903.7	1531.2	1050.2	678.8	
5 Year Supply		6290	6421	6992	7058	7783	8191	8880	8537	8296	7492	7123	6405	4887	3389	2225	943	
Supply in Years		2.50	2.67	3.02	2.92	3.22	3.30	3.91	3.71	3.70	3.23	3.07	2.72	2.57	2.21	2.12	1.39	

Surplus/Shor As a %

-7628 -25%

Notes:

- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
- 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025 and adjusted to reflect Annex 2 test of Deliverability and Paragraph 75 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

From: [REDACTED]
To: [policy, planning](#)
Subject: Draft Local Plan - further documentation - Comments of Objection
Date: 06 July 2026 10:50:23
Attachments: [FW Were using water faster than nature can replace it.msg](#)
Importance: High

Dear Sirs

I would like to further **object** on the Medway Council's draft Local Plan – further documentation:

- **Review of updated strategic flood risk data and implications for the Regulation 19**

- Sustainability Appraisal**

This work should have been carried out promptly as this is a very important concern. We already suffer from water issues without flood risk. Late last year, the new builds in Cliffe Woods, near Town Road, caused major water supply issues for other parts of the village. Strood already floods in areas – nothing has been done to sort this out and further building will exacerbate the problem.

- **Playing Pitch Strategy**

The football ground in Strood is at risk from housing development plans in the unapproved local plan. Even if the football pitch is protected, players and other users of the land will risk having more pollution around them.

- **Built Facilities Strategy**

8.3 The council's vision is for Medway to be a location of quality development and correspondingly high quality environments. This is key to fostering happier, healthier residents that are proud of their homes, towns and communities where they live.

Residents are opposing the sheer numbers of proposed house builds as this will not benefit our community – we are already struggling to get places at schools and special schools for our children, health care including dentist is a huge concern and the roads..... well, the potholes speak volumes. Public transport is dire.

8.10 New homes currently must meet a national Building Regulations standard for water efficiency of 125 litres/person/day. The National Planning Practice Guidance aims to exceed this standard through the imposition of locally adopted standards in order to promote additional water efficiency. New residential development in Medway therefore should meet the higher national water efficiency standard of 110 litres/person/day.

Please see the attached email from SW. As soon as 2030, water demand in the South East could exceed supply.

Stop pushing our resources over the limit.

Helen Whately MP, Housing Minister, assured new homes “will not be built” if the infrastructure to provide them with water is not in place.

B22.4 – Green Belt

Residents were not consulted openly where decisions were made to change Green Belt land to grey belt land status.

The Council has made the process very light and does not communicate clearly with residents – relying on the odd facebook post or email. This makes it impossible for elderly residents to view, comment. Paperwork is not in layman's terms making it extremely

difficult for residents to understand. There has been no robust review. Lack of consultation is poor service.

- **Facilities Planning Model**

Until the area has proper resources in place for the sheer volume of residents already house, no more house building should take place.

MLP/ED7 – The Green Belt in Strood is farmed, active agriculture land and also home to a live oil pipe feeding our airports.

This land should be protected and continue to be Green Belt as otherwise we will have coalescence with Gravesham.

We need to keep our identities clearly separate and not merge.

To not have all the relevant information at the start of the consultation shows how lapse Medway Council has been with their preparations, reviews – the plan has been rushed and not in the best interest of the people who live in Medway. To further burden the land with more housing is irresponsible, so many of the identified sites are Green Belt.

This land is precious for our wildlife and food sources along with all the positive reasons for humans' wellbeing. Once it is gone, it is gone forever – hardly the legacy we should leave to our Children.

The road system is dreadful now – the Medway Tunnel closed a week or so ago due to damage caused by a lorry and the surrounding roads were gridlocked.

The A2 and M2 are heaving with traffic and sadly there have been many accidents – with fatalities. Adding further vehicles to this route is ludicrous. The Wainscott Bypass is super overloaded with huge queues of traffic every day.

Please do not make the roads even worse by building more houses. Medway is at capacity. Let's have a new hospital first and reevaluate our position. We need to enjoy our lives and not be penned in.

Local people have told the Council – we do not support the Local Plan – please listen.

Regards

Nicola

ME2

University of Greenwich, a charity and company limited by guarantee, registered in England (reg no. 986729). Registered Office: Old Royal Naval College, Park Row, Greenwich SE10 9LS.

From: [REDACTED]
To: [policy, planning](#)
Cc: [REDACTED]
Subject: Local Plan Consultation - MEDWAY COUNCIL PLAYING PITCH STRATEGY ASSESSMENT REPORT EXECUTIVE SUMMARY
Date: 06 July 2026 12:03:57

1.24 Three sites used by community rugby union clubs provide good quality ancillary provision. Cliffe Recreation Ground, which is used by Cliffe Crusaders RFC doesn't provide any changing rooms. **Home and Away Changing Rooms with showers are provided.**

Cliffe Crusaders have indicated a requirement to provide flood lighting and there is a need for a 3G requirement for mid-week training and matches for junior and women's team to reduce wear in the one pitch.

Chris Fribbins, Councillor Cliffe and Cliffe Woods Parish Council

From: [REDACTED]
To: [policy, planning](#)
Cc: [REDACTED]
Subject: Medway Infrastructure Delivery Plan
Date: 06 July 2026 12:23:15

2.7.3 Further growth is planned in villages, such as High Halstow and Cliffe and Cliffe Woods, across the wider peninsula.

Cliffe and Cliffe Woods cannot be considered as part of the Hoo Peninsula for Planning Purposes - the area is served by the B2000 and does not benefit from improvements in the Hoo and Chattenden areas served by the A228 dual carriageway. Access to planned infrastructure on the Hoo peninsula would be accessible via Hollywood Lane (local road) and the congested Four Elms Roundabout. There are specio

There are requirements to ease traffic congestion on the B2000 and the junction of the A289 (Wainscott Bypass) exit and entry.

Chris Fribbins, Cliffe and Cliffe Woods Parish Council

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: DEVELOPER CONTRIBUTIONS AND OBLIGATIONS GUIDE
Date: 06 July 2026 12:29:45

There is insufficient detail about developer contributions to P
parished areas. Funds are required to improve local infrastructure to cope with recently approved
housing developments and potential growth. If Medway Council had adopted Community
Infrastructure Levy there would have been enhanced contributions to the parish as there is an
adopted Neighbourhood Plan.

Chris Fribbins, Cliffe and Cliffe Woods Parish Council

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: MEDWAY COUNCIL BUILT FACILITIES STRATEGY DRAFT ASSESSMENT REPORT
Date: 06 July 2026 12:39:40

More research and support is required for providing built facilities in the rural parishes of Medway. These areas are remote from the existing and planned facilities but have a local need.

Chris Fribbins, Cliffe and Cliffe Woods Parish Council

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: Local Plan - Additional Consultations
Date: 06 July 2026 12:45:02

There has been a lack of sufficient consultation or consideration of Parish Council area needs for existing and future requirements for their areas.

Chris Fribbins Cliffe and Cliffe Woods Parish Council

From: [REDACTED]
To: [policy_planning](#)
Subject: Local plan 2041
Date: 06 July 2026 12:44:12

You don't often get email from [REDACTED] [Learn why this is important](#)

To whom it may concern,

I object to the Medway Local Plan 2041 and contend that, in its current form, it is not legally compliant and is not sound.

The proposed release of Green Belt land west of Strood has not been justified by robust evidence that it is the only reasonable or sustainable option. The Council has failed to demonstrate that the necessary infrastructure—including healthcare, school capacity, public transport and road improvements—will be available to support the scale of development proposed.

The Plan also proposes the loss of valuable Green Belt and high-quality agricultural land without sufficient justification. In my view, this is contrary to the principles of sustainable development and fails to protect land that should only be released in genuinely exceptional circumstances.

For these reasons, I request that the Planning Inspector finds the Plan legally non-compliant and unsound and requires the Council to revise it before it can proceed.

Best regards
Tracy Charlesworth - local resident



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

Our ref: SAV11/1 (LPF)
Your ref: Medway Local Plan 2041

06 July 2026

Attn: Mr Dave Harris, Chief Planning Officer

BY EMAIL ONLY: planning.policy@medway.gov.uk

Dear Sirs

RE: Medway Local Plan 2041 supporting evidence documents

1. We are instructed by Unitary Authority (Medway Council) Cllr Michael Pearce, on behalf of the Save the Hoo Peninsula campaign, an unincorporated group of individuals concerned about proposed allocations on the Hoo Peninsula. We have reviewed the supporting evidence documents not available to view during the previous consultation periods for the Medway Local Plan 2041.
2. The letter sets out our concerns with these documents most notably that the HRA is fundamentally and legal flawed and should not be accepted by inspectors following the principles established in Waddenzee (Case C-127/02) [2004] Env LR 14 and domestic case law equivalents. By extension, this renders the draft Local Plan's reliance upon Policy S3 unsound as there is no evidence that the policy is even remotely effective.
3. For transparency, please note that we have also sent this letter to the Inspectors directly as we believe the plan cannot be progressed further until the issues are remedied and so felt it necessary to advise Inspectors of this as soon as possible.

Reliance on unproven efficacy of SAMM/Bird Wise initiative

4. The draft Medway Local Plan relies upon a 'submission HRA'¹ (Lepus Ecology 2025) which places almost total reliance on the continued implementation of the North Kent Strategic Access Management and Monitoring Strategy ("SAMMS"). The SAMMS is implemented via the 'Bird Wise' partnership² in order to reach a conclusion of "no adverse effect on integrity" in respect of recreational pressure effects from new development proposed under the draft Plan, acting on the North Kent Marshes SPA/Ramsar sites (Medway Estuary and Marshes, Thames Estuary and Marshes, The Swale).

¹ <https://medway.oc2.uk/docfiles/30/Interim%20Habitats%20Regulations%20Assessment.pdf>

² <https://northkent.birdwise.org.uk/about/>

5. That conclusion is reached for the Plan alone and in-combination with other plans or projects (see paras 7.2.6–7.2.10, restated at the overall conclusion, para 9.1.4). The submission draft Local Plan accordingly relies upon emerging Policy S3 for soundness; a policy that continues to rely on the per-unit tariff contribution to the ‘Bird Wise’ scheme as the default mitigation mechanism for any residential development within the 6km Zone of Influence proximal to the coastal SPA/Ramsar Sites.
6. All proposed allocation sites in the Hoo Peninsula fall within this 6km Zone of Influence (and indeed no part of the Hoo Peninsula is further than around 5km from the nearest area of coast). Furthermore, the geography of the Peninsula renders it more likely that new residents will seek foreshore or coastal recreation than residents in other parts of the North Kent Zone of Influence, where there are generally more significant and accessible inland recreation options.
7. As is noted at para 3.7.6 of the submission HRA, the North Kent SAMMS has been running for over a decade. It was first established in 2014, as a response to research into bird disturbance and visitor origin carried out by Footprint in 2010–2012, and has been applied to residential developments from 2015. The partnership delivery scheme (‘Bird Wise’), set up to receive, manage and deploy the income stream from tariff payments, has itself been operating since 2017.
8. **The SAMMS/Bird Wise scheme is not therefore a novel approach to mitigation whose efficacy has had no time to be demonstrated and where reliance on future monitoring might be proportionate and reasonable. It is a scheme that has been operating for around a decade. It is not unreasonable to ask the question as to whether it is working, indeed one would expect that to be a central and critical question for the submission HRA.**
9. In answering that question, one would also expect the HRA to be able to draw upon a substantial longitudinal dataset for the decade that SAMMS/Bird Wise has been operational — a dataset including visitor counts, warden intervention logs, WeBS trend correlation, and data on disturbance event frequency over multiple years, and sufficient to demonstrate whether the SAMMS mechanism has actually reduced disturbance to qualifying bird populations and successfully prevented adverse effects on the integrity of the affected European/Habitats sites.
10. However, after around a decade and an interim strategy review, the only monitoring data cited in the submission HRA is a single study by Kent Wildlife Trust (“KWT”) (2022).³ It is notable that this study is not appended to the submission HRA but merely footnoted. Chasing down that study finds that, at best, the data it presents indicates that rather than a decade-long trend of demonstrable improvement, disturbance is still a major issue and declines in qualifying bird species are continuing. Its authors state “*It is difficult to be able to attribute any change in numbers or distribution of waterbirds specifically to anthropogenic disturbance with periodic snapshot surveys eleven years apart. That type of assessment would require a longer-term programme of monitoring...*” (KWT 2022, para 4.2). One question that should concern the inspectors here is “why has there apparently been only one ‘snapshot’ survey to test the efficacy of the SAMMS approach since its inception?”

³ KWT (2022) Medway SAMMS Bird Disturbance Survey Report 2021/22

11. We reiterate that KWT 2022 is the single and only document the submission HRA cites as its evidence base for evidence of SAMM/Bird Wise efficacy (HRA footnotes 126/128). Yet, as indicated by the quote above, the authors of that report explicitly disclaim the ability of that study to support any conclusion that SAMM/Bird Wise is working. In point of fact, Appendix 2 of KWT 2022 reproduces WeBS (Wetland Bird Survey) population trend data for SPA feature species that, if anything, suggest the opposite.
12. The data series presented in Appendix 2 encompasses the 25 years to 2016/17 and therefore captures only the earliest years of commencement of the SAMMS initiative, within the 'short-term' (i.e. 5 year) data bracket. It is notable that these short-term data show trends of continuing significant decline (Thames Estuary and Marshes and Swale SPAs) or a slowing of improvement (Medway Estuary and Marshes SPA) amongst the waterbird assemblage taken as a whole, despite the implementation of the SAMMS scheme (see Figure 1 below).

Figure 1: short term (5 year) trends in waterfowl assemblage up to 2016/17

	Short-term (5 yrs)	Medium term (10 yrs)	Long term (25 yrs)
Thames Estuary and Marshes	-11%	+14%	+30%
Medway Estuary and Marshes	+6%	+17%	-46%
The Swale	-17%	-30%	-8%

13. In order to look at this further, Appendix 2 of KWT (2022) is reproduced in full below. It is notable that at the species level, and in the short-term period that encompasses the inception of the SAMMS, there are also significant trends of decline amongst disturbance-sensitive species in both the Thames Estuary and Marshes and Medway Estuary and Marshes SPAs (e.g. Grey Plover (-41%/-49%), Knot (-63%/-25%), Redshank (-39%/+24%). While some other species are stable or increasing (e.g. Avocet, Black-tailed Godwit), in most cases this is a consequence of well-known population level increases in the Thames Estuary generally which are unrelated to SAMM/Bird Wise efficacy.

APPENDIX 2 – Waterbird trends on North Kent SPAs

		Thames Estuary & Marshes			Medway Estuary & Marshes			The Swale		
		ST	MT	LT	ST	MT	LT	ST	MT	LT
GG	Great Crested Grebe				-24	-1	-72	-44	-57	-24
LG	Little Grebe				-67	-76	-77	25	0	-16
AV	Avocet	14	73	645	81	47	755	125	68	800
BA	Bar-tailed Godwit	-88	-56	-36	11	-24	6	-8	55	89
BW	Black-tailed Godwit	3	202	641	26	167	214	-26	-18	3
CS	Common Sandpiper									
CU	Curlew	9	-9	0	11	-14	-68	-15	-25	-25
DN	Dunlin	1	15	55	68	75	-61	-21	-18	-38
GP	Golden Plover	-34	-63	-60	-57	-31	-14	-65	-81	-29
GK	Greenshank				82	63	-84			
GV	Grey Plover	-41	-4	-18	-49	-65	-93	-22	-31	-46
KN	Knot	-63	20	342	-25	-14	24	8	12	22
L	Lapwing	-7	-5	-47	-17	-11	6	-34	-54	-32
OC	Oystercatcher	-21	-53	-10	6	-7	-42	-22	-27	-4
PZ	Purple Sandpiper									
RK	Redshank	-39	-49	-61	24	4	-77	-18	-25	-53
RP	Ringed Plover	43	-37	-56	72	42	-72	-3	-31	-38
SS	Sanderling							-50	33	1400
SN	Snipe									
DR	Spotted Redshank									
TT	Turnstone	-29	-67	-58	44	-10	-53	66	30	61
CG	Canada Goose									
DB	Dark-bellied Brent Goose				10	39	-66	-6	-3	-8
E	Eider									
GA	Gadwall									
MA	Mallard	-4	-6	-28	18	33	-62	-12	-37	-28
MS	Mute Swan	-30	-31	-46	30	42	-46	-7	-34	22
PT	Pintail	-34	-61	-70	2	-37	-39	-30	-64	-42
RM	Red-breasted Merganser				-77	-79	-96	-65	-74	-80
SU	Shelduck	-7	-34	-44	33	35	-51	-1	-23	-23
SV	Shoveler	21	194	236	4	-29	24	-34	-47	-45
T	Teal	-33	0	46	22	115	-6	-51	-52	-9
WN	Wigeon	16	131	303	-37	-30	-71	20	4	37
	Assemblage	-11	14	30	6	17	-46	-17	-30	-8

Population trends over the short (ST), medium (MT) and long (LT) terms of SPA feature waterbirds recorded during disturbance surveys in 2021/22. Data presentation is adapted from [Woodward et al. \(2019\)](#); blank cells = no data available.

14. These WeBS data therefore provide grounds for concern, or at least caution in considering the efficacy of the SAMMS/Bird Wise scheme. It cannot be deduced from these data that the scheme is “working”, and yet the submission HRA presents or relies upon no other dataset. In fact the submission HRA never once reproduces, cites, or engages with even these data — its only WeBS-related footnote is to somewhat older “*Marshes WeBS counts 2010/11 to 2015/16.*” It is a fundamental omission of the submission HRA that data in a document evidently available to its authors and which shows a trend of continuing declines in the wintering waterfowl assemblages of the SPAs most exposed to the Plan's growth is simply not discussed anywhere in the recreational pressure chapter.
15. Of course, a relevant consideration here is whether or not these ongoing declines have continued since 2017 and if so whether they are solely or partially caused by unmitigated

or inadequately mitigated recreational disturbance. The submission HRA fails to tackle either. KWT 2022 at least attempted to engage with the latter question (at Section 4.3) and (rightly) concluded that it requires further investigation. KWT 2022 suggests, for example, further WeBS sector-plot analysis to help attribute cause including frequent (ideally annual) monitoring at the busiest sites rather than snapshots spaced 11 years apart. It also suggests a dedicated Brent Goose study given this species' consistently high disturbance response rate; and research into whether Covid-era lockdown access changes affected bird behaviour. It is striking that no such studies appear to have been carried out – at least none are referred to in the December 2025 submission HRA; no sector-plot analysis is referenced, no annual monitoring dataset is cited, no Brent Goose study is mentioned. It must be concluded that these recommendations, despite their crucial importance to the question of efficacy, have simply been ignored.

16. In short, three and a half years after KWT made clear recommendations to close the efficacy evidence gap, the submission HRA a) gives no indication that they were acted upon and b) continues instead to rely upon the mere existence of the SAMM/Bird Wise as an adequate answer to the question of efficacy. It therefore proceeds to a conclusion that disregards the intrinsic importance of the efficacy question to the integrity test and the critical legal test of scientific certainty and lacunae.
17. The submission HRA's total reliance on the mere existence of the North Kent SAMM/Bird Wise initiative as a whole answer to the question of mitigation is completely insufficient.
18. It clearly fails, in our view, to surmount the high scientific certainty test set by CJEU case law such as Waddenzee and reflected in England and Wales case law by cases such as Steel Cross.⁴ While an argument that it is "too early to tell" if the North Kent SAMM/Bird Wise initiative is working might have had some justification a decade ago, that is no longer a legitimate excuse. It is stark that the submission HRA seeks to rely upon a study that specifically highlights key lacunae and recommends measures to try and address such evidence gaps, but then disregards that no such measures appear to have been taken. Furthermore, the data at Appendix 2 of KWT 2022 actually magnifies the concern. One cannot help but wonder what the administrators and partner organisations of the North Kent SAMM/Bird Wise initiative have been doing in all that time.
19. The implications of this evidence gap are hugely significant for the soundness of the draft Local Plan. Table 7.1 of the submission HRA lists at least 20 allocations sitting within the Zone of Influence — something in excess of 8,000 residential dwellings (HHH12: 1,800; HHH22/31: 1,700; GN15: 1,100; RN9: 750; HHH26: 760; HHH8: 450; and so on). This is before counting the wider 6km Zol population which is larger still.
20. We note that the submission HRA flags, at para 7.2.13, that Bird Wise "may not completely address" recreational impacts for exactly these higher-risk allocations — a gap the submission HRA then suggests is closed by the non-statutory, undelivered Hoo Peninsula Strategic Environmental Programme. Unfortunately, that is no answer to the problem — it is merely an aspirational policy initiative, not any bespoke, improved or enhanced form of the unproven SAMMS/Bird Wise initiative, and it therefore similarly fails the lacunae/certainty tests.

⁴ Wealden District Council v Secretary of State for Communities and Local Government and Knight Developments Ltd [2016] EWHC 247 (Admin) (Lang J), upheld on appeal as Secretary of State for Communities and Local Government v Wealden District Council [2017] EWCA Civ 39 (Lindblom LJ and McFarlane LJ).

21. In conclusion, the only evidence presented for the efficacy of the mitigation relied upon in the submission HRA in order to avoid adverse effects on the integrity of the coastal Habitats Sites is a) that fact that the SAMMS/Bird Wise scheme exists and b) the fact that it functions as a repository for tariff contributions and a revenue stream towards mitigation efforts. The absolutely essential further question - "is it working?" - is wholly, and we would argue potentially unlawfully, neglected and in fact the only monitoring data cited, the Kent Wildlife Trust Winter 2021/22 bird disturbance survey (cited repeatedly, e.g. paras 3.7.6, 7.2.2) merely provides grounds for heightened concern about the efficacy of the SAMM/Bird Wise approach, not any evidence of efficacy.
22. The KWT study describes continuing impact pathways such as the link between dogs off the lead and bird disturbance and it identifies key focal areas along the coast for access and recreational activity. Appendix 2 of the study contains data that only partially overlaps with the operational phased of SAMMS/Bird Wise, and which for that overlap period shows, overall, a picture of *declining* trends for qualifying features, not stabilised or improving trends. Individual species data show continuing declines for a suite of species vulnerable to disturbance. While there may be legitimate grounds for attributing some of these declines (or some portion of these declines) to regional or national trends unrelated to site-specific recreational pressure, those grounds are not articulated or evidenced and no attempt is made to disaggregate the effect of such trends from local effects as a means to test the efficacy of the Bird Wise/SAMM approach.
23. In short, the submission HRA never once engages with the critical question of whether the SAMM/Bird Wise recreational mitigation package is actually working. It just assumes it is. That is a long way short of the appropriate assessment requirements demanded by relevant case law.
24. Arguably worse is the fact that the submission HRA describes crucial monitoring of the efficacy of the SAMM/Bird Wise initiative, over a decade into its operation, still as a *future* exercise. Para 7.2.6 says the 2024 strategy sets out "*measures to monitor the efficacy of this mitigation and will be subject to regular review*". The submission HRA therefore falls into the trap of illegitimately treating a commitment to future monitoring as adequate and robust assurance of efficacy, instead of a means for collecting robust evidence that in this case ought already to have been gathered and assessed.
25. Finally, it is striking how different the evidential standard sought for assessing air quality impacts is versus recreational pressure. At para E17/9.2.1, for the North Downs Woodlands SAC, the authors identify likely adverse air quality effects and explicitly state: "*further evidence is required to demonstrate that the proposed mitigation will be effective before a conclusion of no AIOSI can be reached.*" Precisely the same evidence gap exists for recreational disturbance too — yet for the Bird Wise/SAMMS scheme there is no equivalent qualification. Indeed, the recreational no AIOSI conclusion (para 9.1.4) is stated unconditionally, while sitting on evidence that is, even more lacking than the air quality evidence the authors themselves judge to be insufficient. That's an internally inconsistent standard of proof.

Conclusion

26. The submission HRA is fundamentally and legally flawed and should not be accepted by the inspectors. By extension, this renders the draft Local Plan's reliance upon Policy S3,

in the absence of the relevant measure of certainty that this policy is even remotely effective, as unsound.

Yours faithfully



RICHARD BUXTON SOLICITORS

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Gun Wharf
Dock Road
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Kent ME4 4TR

Our Ref: 096-003

Email: planning.policy@medway.gov.uk

6 July 2026

Dear Sirs,

Peel Waters

Representation on Strategic Transport Assessment (Consultation June 2026)

We write on behalf of our client Peel Waters in response to the consultation on the further draft evidence base documents ahead of the 6 July 2026 deadline.

Specifically, we are keen to reiterate our comments previously made to the Regulation 19 Plan in August 2025 in respect of Policy DM15 and S24 and the proposition set out in the [2024] Strategic Transport Assessment, that there will be a need for a major upgrade to the Pier Road gyratory at Gillingham Gate as the main vehicular access to Chatham Waters and site allocation SM16 towards the end of the Plan period - at an estimated cost of up to £38m.

As stated in our August 2025 representation, Peel Waters questions the overall approach and principle of the scheme proposed and does not accept that the proposed new gyratory will be required.

This matter was subsequently discussed with the Council and Jacobs at a meeting in October 2025, from which we understood the basis for the proposal would be reviewed, given it was only based on initial high-level tests and was '*a first pass scheme.*'

However, on reviewing the suite of documents that comprise the updated Strategic Transport Assessment which are now open for public consultation [dated December 2025] we note that they still refer to and rely on the roundabout proposal for Gillingham Gate.

Although the reports have been updated since the previous 2024 documents were reviewed, aside from some re-ordering and swapping around of content between the reports, the technical work relied upon appears to be the same – certainly in terms of site SM16.

As such, the very basic roundabout arrangement (badged as an improvement) remains, and there appears to have been no attempts to improve upon the assessments or the scheme itself.

The latest cost allowance in the updated [Dec 2025] IDP for the Gillingham Gate improvement has inexplicably been reduced to £18m-£30m, with no apparent change or update to the scheme.

The scheme still takes no account of the pedestrian and cycle provisions which exist now and which would be needed in any future scheme and that, as a consequence, the 'improvements' in performance would not be realised in practice as, through this omission, the performance and results will artificially inflate the capacity of the roundabout alternative.

Peel Waters remains unconvinced that the scheme is needed, which is relevant to delivery and how the Council might seek mitigation and improvements to be funded. The Local Plan requires developer contributions towards transport mitigation based on the distribution of new trips routing via the junctions which require mitigation.

It is not clear how the Vehicle Trip Budget contributions will function in practice or what this means for delivery of site allocations (including SM16). Peel Waters would therefore prefer a more traditional method of assessment of the Site's impacts with focused mitigation. This matter feeds into the wider consideration of viability, contributions and delivery of proposed development at the allocated sites.

Peel Waters would like to ensure that it is able to attend the EiP in person to address these issues including site delivery; developer contributions; strategic highways mitigation; waterfront development and any site related discussions including SM16.

Yours faithfully

A black rectangular box redacting the signature of Bill Davidson.

Bill Davidson
Director

cc: Peel Waters

Medway Council
Planning Policy

Our ref: KT/2006/000047/SF-
02/PO1-SUPP1

Sent by email.

Date: 6 July 2026

Dear Medway Council,

Medway Council consultation their supporting evidence base documents.

Thank you for consulting us on the above application which we received on 5 June 2026.

As part of this consultation, we have reviewed the following documents:

- Technical Note, Medway Local Plan Examination Review of updated SFRA data and implications of for the Regulation 19 Sustainability Appraisal, by Lepus Consulting (ref: LC-1555_Medway Local Plan Examination, dated: 1 June 2026)

Please note we have not reviewed the other documents as part of this consultation because they are not within our remit.

Environment Agency position

Our position currently remains that we find the 'Medway Local Plan 2041' and the associated evidence base 'unsound'.

Please refer to the following sections for our full response:

- Section 1: Technical comments

The comments within section 1 build upon our response to the Regulation 19 consultation dated 7 August 2025 and more recently our response to the Strategic Flood Risk Assessment consultation dated 5 December 2025.

Environment Agency planning advice service

As allocated or windfall sites with relevant environmental constraints or opportunities progress towards development, we would encourage applicants to engage with our planning advice service as early as possible.

We can provide detailed guidance on and/or review technical information for development proposals, prior to submission of planning applications, as part of our cost recoverable planning advice service.

Engagement with us prior to formal submission can provide applicants with greater certainty regarding our position and can speed up our formal response to planning

applications. It should also result in better quality and more environmentally sensitive development.

We look forward to continuing to work in partnership with Medway Council to ensure development protects and enhances the environment.

We hope that you find our comments useful, and we would be pleased to meet with you to discuss in more detail any issues or queries you may have. Should you have any further questions, please do not hesitate to contact us.

Yours sincerely,

Connor Bowman
Sustainable Places Planning Specialist
E-mail [REDACTED]

Section 1: Technical comments

We have previously provided site-specific comments in relation to the allocated sites and the sustainability appraisal at the Regulation 19 stage of the local plan consultation. More recently, we have provided comments regarding the updated Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2, as well as the Sequential Test report, which also included a set of site-specific comments.

We raised concerns regarding Level 1 SFRA, Section 2.6 states that ‘the entire coastline benefits from defences with the exception of Allhallows-on-Sea’, however there are areas that currently do not have formal flood defences present, for example areas of natural high ground or river walls.

In addition, we have concerns regarding the Level 2 SFRA and the number of ‘more vulnerable’ residential site allocations in Flood Zone 3 and Flood Zone 3b. This is against National Planning Policy Framework (NPPF) and it has not been made clear from the SFRA how these have passed the sequential test.

The following comments are made in response to the Medway Local Plan Examination Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal Technical Note (code: LC-1555_Medway Local Plan Examination; dated: 01/06/26; produced by: Lepus Consulting).

Table 1: SA Objective 2: Climate Change Adaptation Receptor Methodology defines the likely impact scoring for fluvial flooding. The likely impact scoring in Table 1 has been split into three categories based on Flood Zones 1, 2 and 3. However, it is not clear how the likely impact changes between pre-mitigation and post-mitigation and, we have two fundamental concerns with the possible data used to inform the methodology.

For example, we would also like to take the opportunity to state that it is tidal flooding should be considered from the River Medway, not fluvial flooding. We would therefore question if the appropriate data has been used to conduct this review, for example, are the sites being considered at risk from the 1% Annual Exceedance Probability (AEP) when the 0.5% AEP should be being considered.

Secondly, Table 1 also defines the likely impact of flood defences, based on the site’s proximity to the flood defence. Whilst we would support sites having adequate space for maintenance of flood defences where they are present it is also important to consider that not all sites are currently protected by flood defences, and where flood defences are present, they will not always provide a sufficient standard of protection to keep the site safe for its lifetime.

Furthermore, it is not clear how several sites have changed from being defined as in Flood Zone 3 (Table 3: Reasonable alternative non-strategic sites impact matrix for SA Objective 2 – Climate Change Adaptation (pre-mitigation)) and are then defined as Flood Zone 2 (Table 5: Reasonable alternative non-strategic sites impact matrix for SA Objective 2 – Climate Change Adaptation (post-mitigation)). We have not had

the opportunity to review the evidence which supports the findings presented in Table 5. For example, it is not clear how sites such as CHR14, RWB2 and SNF38 have gone from being in Flood Zone 3b to Flood Zone 2.

Paragraph 16 states that 'The findings of the Regulation 19 SA in respect of fluvial flood risk therefore remain valid'. We would therefore like to take this opportunity to reiterate our comments to the Regulation 19 consultation and in particular to the consultation on the Level 1 and Level 2 SFRA and the sequential test report that were updated in November 2025, where we have made detailed site-specific comments but overall, we raised significant concerns regarding the Level 2 SFRA and the number of 'more vulnerable' residential site allocations in Flood Zone 3 and 3b which are against NPPF. As well as the consideration of flood defences within the Level 1 SFRA. As stated above, it is not clear how flood risk of these sites has been determined within table 5 (post-mitigation) of the most recent report.

Rebecca Smith

ME2

6 July 2026

Planning Policy Team
Medway Council
Gun Wharf, Dock Road
Chatham, Kent, ME4 4TR
By email: planning.policy@medway.gov.uk

Dear Sir or Madam,

Re: Objection to Policy SA6 (Land West of Strood) and Policy S7 (Green Belt), Medway Local Plan 2041. Comment on the B22.4 Green Belt Exceptional Circumstances Topic Paper and MLP/ED7. Land next to [REDACTED], Strood.

I am writing to object to Policy SA6, Land West of Strood. I am the occupier of [REDACTED]. My home directly adjoins the site. The proposed access would run straight in front of my property. This comment relates to the B22.4 Green Belt Exceptional Circumstances Topic Paper and to the Council's response to the Inspectors on Green Belt (MLP/ED7).

This land has been fought over before. A scheme for around 300 homes was resisted here on Green Belt and farmland grounds. Similar proposals have been refused in the past. I do not believe anything has changed to justify building on it now.

I object on the grounds below. Each one is a material planning consideration. I would ask that this objection be recorded and passed to the appointed planning inspectors.

1. Green Belt and exceptional circumstances

The site is Metropolitan Green Belt. Releasing Green Belt through a Local Plan requires exceptional circumstances to be proven. I do not accept that the Council has proven them here. The B22.4 topic paper and MLP/ED7 do not make that case for this site. The land is in active farming use. It helps stop Strood merging with the settlements to the north and east. It does real Green Belt work. If the land is being treated as grey belt I would ask for the evidence behind that. Grey belt still remains Green Belt in policy terms. Any housing here would need to sit in a sustainable location. It must not undermine the rest of the Green Belt. It must meet the Golden Rules on affordable housing, infrastructure and green space. None of that has been shown.

2. Protected wildlife

The field is full of wildlife. I have watched birds of prey hunting over it many times. They include kestrel, sparrowhawk and red kite. All wild birds are protected under the Wildlife and Countryside Act 1981. It is an offence to kill or injure them or to destroy an active nest. The red kite has the highest protection as a Schedule 1 species. It is also an offence to disturb it. These birds show there is a healthy prey base here. That habitat would be lost.

I would ask whether a proper up to date ecological survey has been carried out at the right time of year. I would also ask how this site could deliver the biodiversity net gain the law now requires. If that work has not been done the allocation is premature.

3. Public safety: high pressure gas pipeline

A high pressure gas pipeline runs along my garden boundary and across the site. I have to ask the pipeline operator for permission just to put up a garden fence. That shows there is a safeguarding easement here. Pipelines like this are major accident hazard pipelines. They fall under Health and Safety Executive controls with inner, middle and outer zones around them. The Council has a legal duty to consult the HSE on development inside that zone.

I would ask for confirmation that the HSE has been consulted through its Planning Advice Web App. I would like to see the response. If I cannot put up a fence without consent I do not understand how houses and an access road next to the pipeline can be safe. If the HSE advises against it the site should not go ahead.

4. Highway safety and the access road

The access would join Clinton Avenue right in front of my home at the end of the road. This worries me for two reasons. The first is safety. A new access and extra traffic at this point needs proper independent assessment by the highway authority. The second is the effect on my home. An access road outside my window means noise, headlights, fumes and disturbance. The road is quiet now. That would change for good.

5. Loss of farmland

The site is in active arable use. It has been described before as high grade farmland. Losing productive farmland is a material consideration. I would ask for the agricultural land classification of the site to be established. The loss should be weighed properly. The case for giving up this land has not been made.

6. Pressure on local services and infrastructure

Local services are already stretched. A large number of new homes have recently been built at Cliffe Woods nearby. Local dentists are not taking on new NHS patients as things stand. GP and health capacity in this area is under real pressure. The Golden Rules say new infrastructure should come with any Green Belt release. I would ask what extra health, school and road capacity would actually be delivered. The effect of this site on top of the building already done should be assessed honestly.

7. Planning history

This is not the first attempt to build here. Similar proposals have been refused before. I would ask that full weight be given to that history and to the reasons for those refusals. Where the old concerns have not been resolved those reasons still stand.

For these reasons I object to Policy SA6 and to the development of this land. Please acknowledge this objection and confirm it will go to the planning inspectors. Please keep me informed of any further consultation or hearing dates. I would also like to know whether I am registered to speak at the examination hearings.

Yours faithfully,

Rebecca Smith

ME2

Date: 06 July 2026
Our ref: 550319
Your ref: -



Planning Policy
Medway Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

By email only, no hard copy to follow
planning.policy@medway.gov.uk

Dear Planning Policy Team

Medway Local Plan Supporting evidence base consultation

Thank you for your consultation on the above dated 8 June 2026 which was received by Natural England on the same day.

Given the reduced consultation period, Natural England has focussed our review and advice on the Submission Habitats Regulations Assessment dated December 2025. The absence of comments on the other supporting documents including the additional four documents detailed in the email of the 8 June (Review of update strategic flood risk date and implications for the Regulation 19 Sustainability Appraisal, Playing Pitch Strategy, Built Facilities Strategy and Facilities Planning Model) should not be taken as there being no implications for the natural environment.

Natural England welcomes the opportunity to provide advice on the Submission Habitats Regulations Assessment. We agree with the designated sites and impact pathways that have been screened in for assessment within Section 3 (Scoping of Threats and Pressures at European sites) and we have provided our comments below on specific impact pathways.

Air quality

Natural England notes that Section E16 of the Submission Habitats Regulation details that 'Adverse air quality impacts from the MLP [Medway Local Plan] at the North Downs Woodland SAC were identified. The assessment took into consideration [of] mitigation measures including a strategic approach to a transport mitigation strategy in partnership with Maidstone Borough Council at the North Downs Woodlands SAC to avoid these impacts. However, further evidence is required to demonstrate that the proposed mitigation will be effective before a conclusion of no AIOSI [adverse impact on site integrity] can be reached.

We will be pleased to work with the Council in the coming months regarding your further work exploring mitigation measures jointly with Maidstone Borough Council to ensure that the Medway Local Plan does not result in impacts to the North Downs Woodland SAC. Where these can be agreed, we would be pleased to include our advice within an updated Statement of Common Ground.

Water quality and quantity

Natural England notes that the Council, in preparing the Local Plan has worked with water companies to ensure that there is sufficient water supply to support the growth proposals (Section 6.2.29). We therefore concur with the conclusion that there will be no AIOSI for water dependent designated sites. Similarly, based upon the policy protection and mitigation within the Habitats Regulations Assessment, Natural England agrees with the conclusion regarding water quality impacts to the coastal designated sites.

Recreational pressure

Natural England notes the proposed amended wording for Policy S2 detailed within Sections 7.22-7.2.24, following our concerns in relation to Policy SA8 of the submitted Medway Local Plan. We will be pleased to continue working with the Council to ensure that the Local Plan policy wording provides sufficient mitigation measures for recreational impacts for all developments (particularly those near the designated sites requiring bespoke measures) including the proposed Strategic Environmental Programme. Following discussions on the proposed amendments to Policy S2 and SA8, we will be pleased to reflect these within an updated Statement of Common Ground and are hopeful that, through these discussions, agreement can be reached that an AIOSI will not result from recreational disturbance associated with the Medway Local Plan.

Urbanisation

Natural England welcomes and supports the work the Council commissioned as part of the Cumulative Ecological Impact Assessment to inform the submitted Local Plan. Subject to the discussions and being able to reach agreement on the revised policy wording regarding the Strategic Environmental Programme detailed above, we are hopeful that agreement can be reached that an AOISI from urbanising impacts can be avoided.

I hope these comments are helpful, for any queries regarding the advice in this response please do not hesitate to contact me by email to sean.hanna@naturalengland.org.uk or by telephone on 0208 0266 064.

Yours faithfully
Sean Hanna
Senior Officer
Sussex and Kent Area Team

From: [REDACTED]
To: [policy, planning](#)
Subject: Strood Planning and Development - land from and behind Three Crutches/ Rede Court Road/Brompton Farm Road and Wainscott
Date: 06 July 2026 15:59:15

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Planning Committee

I am a resident who cares about the future of the Strood/Rede Court Road/Brompton Farm Road and Wainscott area. I am not a town planner or do I have a team of people collating evidence. Therefore I would like to add my simple objections I wish to be included in the meeting of the Development Planning Committee 2041.

The many aspects of objections in brief include:

A) Green belt - Grey belt definition

- **Previous Development:** The land may have already been developed (e.g., disused petrol stations, abandoned car parks, or dilapidated commercial buildings).
- **Limited Green Belt Value:** The land does not strongly contribute to the core purposes of the Green Belt, specifically: preventing urban sprawl, preventing towns from merging, or preserving the setting of historic towns.
- **Exclusions:** It explicitly excludes protected environmental assets (such as Sites of Special Scientific Interest (SSSIs), National Parks, or Local Green Spaces).
- Historically, building on the Green Belt has been incredibly difficult, requiring proof of "very special circumstances". The grey belt concept was introduced to unlock unappealing, low-value land—such as scrubland or derelict commercial lots—to help the government achieve its ambitious target of 1.5 million new homes over five years.

The land in question has been and currently is used as 'working' farm land.

How can this be 'grey' belt?

B) environment - lack of water available to existing properties let alone new developments. Water authorities in Kent have made public statements building development should stop with a direct consequence to existing homes. This will spread across Kent and beyond given the change in our current climate.

C) Wild life population - a list of birds currently in our area some of which are on the endangered list.

Blackbird, Blackcap, Chaffinch, Crow, Dove, Dunnock, Goldfinch, Magpie, Redwing, Robin, House Sparrow, Starling, Stone Chat, Blue Tit, Coal Tit, Great Tit, Wood Pigeon, Wren.

D) infrastructure

Again many aspects.

Roads - Many councils are struggling with road maintenance. Pot holes are an issues, causing great damages to cars, Medway Council is not any difference. New roads are not being built meaning roads conditions will worsen, congestion will be worse and day to day travel in our area will be difficult.

Doctors surgeries - making a face-to-face is a rarely, again do we want to put more pressure on doctors and surgeries?

Schools - large classes and potentially lack of choice to parents for their child from primary through to senior schools.

Services - Fire and Police

With impending possible Fire station closures will directly affect the safety of Medway residents.

Kent Police are stretched as it is , how will they managed, how will they monitor new estates when they struggle numbers in their work force to cover the existing areas.

Last but not least, the population have an opportunity to elect a team of councillors in the name of democracy, who they felt will best suit the benefit of our area. Where are those councillors now? should they not be listening to the community who live, work and socialise in the Medway area.

This is just a glimpse of feeling and would relish the opportunity to discuss further if permitted.

Regards

L Wilson

Land South of Lower Rainham Road, Gillingham

Medway Local Plan Consultation on Evidence Base

Date of report: July 2026

PREPARED FOR

Catesby Estates plc

savills

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1. Introduction

- 1.1 Savills has been instructed by Catesby Strategic Land (Catesby) to prepare representations regarding the supporting evidence documents, which are being consulted on between 8 June 2026 – 6 July 2026.
- 1.2 This consultation was instructed by planning inspectors following the submission of the Local Plan. Medway Council (MC) must carry out a further public consultation on the evidence base documents that were not included as part of previous rounds of consultation in order to meet the test of soundness of the Plan.
- 1.3 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.
- 1.4 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, the Regulation 18b in September 2024, and the Regulation 19 in August 2025 (R19). These representations should therefore be read alongside these latest representations.
- 1.5 Specifically, these representations provide comments on the following documents:
 - B2 Infrastructure Delivery Plan (December 2025)
 - B18.1 Strategic Transport Assessment - Forecasting Report
 - B22.1 Site Selection Topic Paper
 - B22.5 Housing Delivery Topic Paper
- 1.6 A detailed description of the Site and the proposed development are contained within Catesby’s response to the R19 consultation. They have not been repeated within these representations.
- 1.7 To support these representations, Neame Sutton Town Planners have prepared a Technical Report Update on housing needs and supply. This is included at **Appendix A**.

2. Response to Evidence Base

2.1 These representations respond only to the additional evidence base documents that have been provided by MC, and should be read on conjunction with our previous R19 response. Catesby's comments on the R19 remain valid.

2.2 For ease of reference, Catesby provide comments on the following evidence base documents:

- B2 Infrastructure Delivery Plan (December 2025)
- B18.1 Strategic Transport Assessment - Forecasting Report
- B22.1 Site Selection Topic Paper
- B22.5 Housing Delivery Topic Paper

B2 Infrastructure Delivery Plan (December 2025)

2.3 The purpose of the Infrastructure Development Plan (IDP) is to identify the strategic infrastructure required to support growth in Medway and how it will be delivered. Its purpose is to inform services, communities and developers what infrastructure is needed, where and when, as Medway grows.

2.4 The IDP includes section 2.8 (Lower Rainham), which is relevant to the Site. It states that:

"Rainham Parkside Village (RN9) will include a local centre commensurate with a new community of 750 new homes, including:

- *a children's nursery;*
- *3 ha of land for a two-form entry primary school;*
- *a Community Hub;*
- *health and wellbeing related services;*
- *a care home;*
- *convenience floorspace that meets the day-to-day needs of the local community only;*
- *up to 15 homes for use as temporary living accommodation; and*
- *a Community Use Agreement with the new primary and secondary schools would help to ensure access to playing pitches and the most efficient use of land"*

2.5 The above appears to be at odds with the specific requirement of Policy SA10, which states that Lower Rainham will provide *"8 ha of land for an eight-form entry secondary school in accordance with the latest IDP."*

2.6 Whilst it is acknowledged that the IDP is a live document which identifies the infrastructure need based on the most relevant information available at the time of writing, this appears to be a significant shift between the two documents.

2.7 Furthermore, the table at paragraph 3.3 of the IDP, sets out the proposed infrastructure requirement for Medway, and identifies *"7 further primary school expansions, 7 new primary schools and new secondary schools (including the secondary school mentioned above)."* It is not clear which school is being referred to in this instance.

2.8 As such, not only is there a disconnect between the IDP and the draft Local Plan, but also the details of the infrastructure requirements are not clear. Within the text of the IDP, it is identified that three new non-selective secondary schools will be required, providing up to 22FE. These are to be located on the Hoo Peninsula, in the Capstone Valley and in Strood, and will be required around 2030.

- 2.9 The IDP also recognises that there will be a requirement for an increase in secondary selective school places, with an additional 6FE of selective provision. This could either be as six 1FE expansions, or one 6FE annexe to a selective school as it is not possible to build new selective schools. These numbers are not included within the three schools identified above, so it is not clear where they are to be located.
- 2.10 The IDP explains that where a school is required wholly because of a single or group of new developments, then the whole cost of the new school should be met from the S106 agreements from these developments, and agreed collectively. It is therefore assumed that should the need arise for a new school at RN9, then this would be funded solely by these developments. This should therefore be set out in the wording of the Local Plan policy.
- 2.11 In addition, since draft Policy RN9 states that “*SME housebuilders will deliver Rainham Parkside Village, overseen by a master SME developer. Development will come forward in bespoke SME-sized parcels with associated SME Partners under an SME Framework*”. As such clarity is sought on how the requisite school provision would be funded and delivered. With a group of SME-sized parcels, up to 750 new homes, careful management and monitoring of any pooled contributions will be vital.
- 2.12 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 housebuilders, 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 as part of a wider allocation.

- 2.13 Summary: The details of the secondary school requirement do not appear to tally with the wording of draft RN9. Furthermore, since RN9 is expected to be delivered in small SME sized parcels, it is not clear how the funding/delivery of any required school will be realised. Clarity is required on this.
- 2.14 We consider that our Site has the ability to provide greater certainty on the delivery of such education provision and therefore should be included as an allocation in the Plan.

B18.1 Strategic Transport Assessment - Forecasting Report

- 2.15 Local Plan Policy RN9 states that the allocation will require “*The widening of Lower Twydall Lane and Lower Bloors Lane will be explored in subsequent detailed design.*” In contrast, B18.1 allows for “*Priority junction access onto Lower Bloors Lane*”.
- 2.16 It is expected that this inconsistency is the result of the timing of the evidence base documents being produced, which has led to variations in the requirements. Notwithstanding this, however, it is not clear how any junction improvements will be funded. This is not set out within B2 or BB18.1, and it is therefore assumed that the expectation is that it will be developer funded. In a similar vein to the education comments above, clarity is sought on how any junction improvements will be funded and how this will be managed amongst a collection of SME parcels.
- 2.17 Summary: As set out in our R19 representations, we consider that Draft policy SA10 (Lower Rainham) should be amended to remove the restriction of 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 would add to the Lower Rainham development including ensuring that the allocation can support the delivery of much needed infrastructure in the local area.
- 2.18 In addition, the inconsistencies with the wording of the transport need should be addressed.

B22.1 Site Selection Topic Paper

- 2.19 The purpose of this document should be to outline the methodology and criteria MC has used to identify, assess, and allocate land for future development (such as housing or employment). It should provide transparency by explaining exactly why certain sites were chosen and others were rejected.
- 2.20 There is a distinct lack of detail in this document. Figure 1 explains that planning officer evaluation of each site formed part of the site selection/rejection process. Details of this assessment do not appear to be readily available, and this forms an integral part of the evidence base.
- 2.21 The land directly to the south east was 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 confusingly, 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.
- 2.22 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 cannot be found sound.
- 2.23 Summary: This is unchanged since our R19 representations, in which we explained that insufficient information has been provided to explain why certain sites have been included and some have been rejected. It remains Catesby's view that the entire area to the South of Rainham Road (RN5 and RN9) is suitable, available and achievable.

B22.5 Housing Delivery Topic Paper

- 2.24 Neame Sutton Town Planners prepared a Technical Report that considered housing needs and supply in Medway (August 2025). This review formed Appendix C of Catesby's R19 response. In response to publication of document B22.5 Housing Delivery Topic Paper (December 2025), Neame Sutton Town Planners has provided an update to their Technical Note – this is at Appendix A of these representations. The following points are pertinent to ensuring that the Local Plan is sound:
- MC has now confirmed a Local Housing Need (LHN) figure of 1,636 dwellings per annum (26,176 dwellings over the revised 2025–2041 plan period). However, it has still failed to properly consider whether the housing requirement should be increased above this minimum level and be ambitious in growth.
 - MC has not adequately assessed the need for additional homes arising from infrastructure funding requirements, affordable housing pressures, economic growth ambitions or unmet housing needs from neighbouring authorities, particularly Gravesham. At the very least, a higher level of housing requirement should be tested.
 - Catesby contends that the minimum housing requirement should be increased to 30,176 dwellings (1,886 dwellings per annum), including an uplift of 4,000 dwellings to address unmet needs and support growth.
 - MC has outlined a reliance on a stepped housing trajectory and the use of the Liverpool method for addressing shortfalls due to past delivery rates and that the 12 strategic site allocations will take time to come forward. However, MC has not evidenced an approach to allocate sufficient

sites of the right size in the right locations to supply new homes across the Plan Period. The use of a Stepped Trajectory is inappropriate and unnecessary.

- MC has failed to identify sufficient housing to meet the minimum LHN with an appropriate buffer. Neame Sutton has identified a shortfall of at least -3,541 to -7,541 dwellings across the Plan Period.
- The Plan would fail to maintain a five-year housing land supply, would not provide the required flexibility or 20% buffer given Medway's poor Housing Delivery Test performance.

2.25 Given the point raised within Appendix A and summarised above, the Plan fails the tests of soundness and legal compliance.

3. Conclusion

3.1 These representations have been prepared on behalf of Catesby in response to the consultation on supporting evidence documents that were not available at previous consultations on the Medway Local Plan. The representation relate specifically to the land south of Lower Rainham Road (identified as site RN5 in the Council's LAA).

3.2 As noted in Catesby's R19 representations, it is evident that the ultimate goal of the Medway Local Plan is to achieve sustainable development and this goal is supported by Catesby. However, Catesby still has concerns that the Plan does not meet the tests of soundness and legal compliance. The additional evidence published for this consultation has not overcome these concerns.

3.3 Comments have been provided on the following documents:

- **B2 Infrastructure Delivery Plan (December 2025)**

There is inconsistency between the Infrastructure Development Plan (IDP) and draft Local Plan Policy SA10 regarding the provision of a secondary school at Rainham Parkside Village (RN9). The requirements, location, funding and delivery of secondary education infrastructure are unclear, particularly given the proposed SME-led delivery model. Concerns are also raised as to whether the scale of infrastructure sought is viable and deliverable through the development alone. It is therefore concluded that greater clarity is required on education provision, and that the adjacent RN5 site could help support the delivery of the necessary infrastructure.

- **B18.1 Strategic Transport Assessment - Forecasting Report**

Concerns have been raised regarding inconsistencies between Local Plan Policy RN9 and supporting evidence documents in relation to the required transport improvements at Lower Twydall Lane and Lower Bloors Lane. There is also a lack of clarity regarding the funding and delivery of any junction improvements, particularly given the proposed SME-led development model. It is therefore recommended that the transport requirements are clarified and that consideration is given to the role of Land South of Lower Rainham Road in supporting the delivery of necessary infrastructure and facilitating the wider Lower Rainham allocation.

- **B22.1 Site Selection Topic Paper**

Concerns are raised regarding the lack of transparency and detail within the Land Availability Assessment (LAA), particularly in relation to the methodology used to assess and select sites for allocation. The assessment is considered inconsistent, as adjacent sites with very similar characteristics have been reached different conclusions without clear justification. In particular, insufficient evidence has been provided to explain why RN5 was excluded while RN9 was deemed suitable, available and achievable. It is therefore concluded that the evidence base does not adequately justify the site selection process, and that the wider area south of Rainham Road, including both RN5 and RN9, should be considered suitable for allocation.

- **B22.5 Housing Delivery Topic Paper**

The Local Plan has not adequately justified its proposed housing requirement or demonstrated that sufficient land has been allocated to meet future housing needs. The Plan should test a higher housing requirement to reflect wider growth aspirations, affordable housing pressures, infrastructure needs and unmet needs from neighbouring authorities. The evidence presented

suggests a significant housing shortfall, with insufficient flexibility to maintain a five-year housing land supply or the required buffer. Further details are provided in **Appendix A**.

- 3.4 Catesby thanks Medway Council for the opportunity to provide comments to the consultation on the published evidence base. Catesby reserve the right to comment on any further public consultation and look forward to engaging actively in the Examination process.

Appendix A: TECHNICAL REPORT UPDATE – HOUSING NEED AND SUPPLY

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Appendices:

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1.0 Instructions and Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Catesby Strategic Land Limited ('Catesby') to prepare an Update to the Technical Report prepared in July 2025 to address the matters of Housing Need and Land Supply in relation to the Regulation 19 consultation version of the Medway Local Plan 2041 and in particular the publication by the Council of its Housing Delivery Topic Paper in December 2025 ("the Topic Paper").
- 1.2 This report sets out an update to 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 In order to assist the Inspector's consideration of Catesby's position on the matters of the housing requirement and supply this update has been prepared in a format that replaces the report previously submitted in July 2025 as part of Catesby's Regulation 19 Representations. The analysis has been brought up-to-date to reflect the Council's more recent evidence set out in the Topic Paper that is the subject of the current consultation.
- 1.4 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

- 1.5 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.
- 1.6 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.

- 1.7 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.
- 1.8 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 year⁶. The Council has now confirmed this will be its position for the purposes of the Examination⁷.
- 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**. The Council has now confirmed this in the Topic Paper⁸.
- 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 The Topic Paper however seeks to update this position to extend the Plan period to 16 years 2025 – 2041⁹, which results in a total LHN of 26,176 dwellings.
- 2.15 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.

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

⁷ Paragraph 5.1.1. on Page 13 of the Housing Delivery Topic Paper December 2025 confirms

⁸ Paragraph 3.1.3 on Page 6 of the Housing Delivery Topic Paper December 2025

⁹ The Council notes that this change would need to form a Main Modification to the Submitted Plan in due course

2.16 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 **26,176 dwellings**.

(iii) Consideration of Factors that Indicate Need for an Uplift

2.17 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.

2.18 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 period¹⁰.

2.19 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.

2.20 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.

2.21 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)

2.22 The Council's approach has therefore failed to grapple with the requirements of the Framework 2024 and the PPG.

¹⁰ Paragraph 040 Reference ID: 2a-040-20241212 Revision Date: 12 12 2024 – Housing and Economic Needs section of PPG

- 2.23 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 \$106 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.
- 2.24 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

- 2.25 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.
- 2.26 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.
- 2.27 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.
- 2.28 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.
- 2.29 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.

- 2.30 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 needs¹¹.
- 2.31 Swale has also commissioned a report by AECOM to look at whether a case exists to progress a housing requirement below the LHN¹². 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 for¹³.
- 2.32 Unmet need arising from these two authorities is therefore more likely than not and the Council has failed to grapple with it.
- 2.33 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.
- 2.34 No consideration of unmet need arising from these locations has been given by the Council.
- 2.35 Section 2.3 of the Topic Paper contains 3 paragraphs on the matter of unmet need and does nothing to address the matters set out above, which is wholly inadequate. Even with the late production of the Topic Paper that provided the Council with a further opportunity to address the matter of unmet need it has simply concluded that unmet need should not form part of the minimum housing requirement for the Plan.

¹¹ 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>

¹² Housing Targets Exceptional Circumstances Study – September 2024 - https://swale.gov.uk/_data/assets/pdf_file/0009/484794/Housing_Targets_Exceptional_Circumstances_Study_2024.pdf

¹³ 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

(v) The Minimum Housing Requirement

- 2.36 The starting point of an LHN equating to 1,636 dpa is established and the Council has correctly calculated this.
- 2.37 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.
- 2.38 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 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.
- 2.39 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 (2025-2041)	Dwellings	Dpa
Local Housing Need (LHN)	26,176	1,636
Minimum Adjustment for Unmet Need and other factors such as infrastructure delivery	4,000	250
TOTAL Minimum Housing Requirement (2025-2041)	30,176	1,886

- 2.40 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 authority¹⁴.
- 2.41 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.

¹⁴ Paragraph 5.3.12 on Page 27 of the SA (June 2025)

- 2.42 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.

(vi) Is a Stepped Trajectory Justified?

- 2.43 The Topic Paper has introduced the concept of a stepped trajectory and Section 3.2 of the document seeks to justify its use for the Plan.
- 2.44 In essence the Council's approach is that a stepped trajectory is necessary along with the application of the 'Liverpool' method of dealing with any shortfall because of its past poor performance and the fact that the Council's spatial strategy in the Plan is reliant upon 12 no. strategic sites that will take time to deliver.
- 2.45 What the above demonstrates is that the application of a stepped trajectory and the 'Liverpool' method is intended to mitigate its past failings and to 'fix' the flaws in its spatial strategy. Rather than grappling with the fundamental issue of allocating enough sites of the right size in the right locations to ensure a consistent supply of new homes throughout the Plan period the Council has opted for the easy route of a stepped trajectory. This does not amount to a Sound approach.
- 2.46 On the matter of the 'Liverpool' method to dealing with any shortfall the Framework 2024 and corresponding PPG are clear that this should not be used. In fact the PPG confirms only the use of the 'Sedgefield' method when dealing with shortfall¹⁵. The Council should **not** therefore be seeking to apply the Liverpool method to any shortfall.
- 2.47 Given that the Council has chosen to remove allocations from the Plan between the Regulation 18 and Regulation 19 consultation stages there is absolutely no justification for the use of a stepped trajectory simply to correct the flaws in the spatial strategy now being progressed.
- 2.48 Equally, the Council's past poor housing delivery performance should not be used as a basis to support a stepped trajectory. Whilst the information contained in Table 1 on Page 6 of the Topic Paper appears quite damning in terms of the Council's past poor performance since 2020 that is reflective of the fact the Council has not had an

¹⁵ Housing Supply and Delivery section of PPG - Paragraph: 022 Reference ID: 68-031-20190722 Revision date: 22 07 2019

up-to-date Local Plan during that period. Clearly, the adoption of this Plan would rectify that situation.

- 2.49 In Catesby's view the use of a Stepped Trajectory is wholly inappropriate and unnecessary in the case of Medway and certainly is not reflective of the key Government policy imperative to significantly boost the supply of housing now.
- 2.50 Furthermore, the approach the Council has taken with its proposed stepped trajectory actually only assists it in the final 5 years of the Plan period, which does not reflect the reasoning provided by the Council for introducing it i.e. that its 12 no. strategic sites will take time to deliver.
- 2.51 For all of these reasons the Plan should be based on a flat trajectory.

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...'¹⁶

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%

¹⁶ 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 **5,235 dwellings** (based on the Council's proposed housing requirement, or an additional **6,035 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 particular¹⁷. Advice is

¹⁷ 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 developable¹⁸.

- 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 2024¹⁹.
- 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 2025 to be delivered during the plan period	A
Large Sites permitted but not allocated	B
Small Sites permitted (less 17% 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.

¹⁸ Paragraphs 010 – 011 Reference ID: 68-010-20190722 and 68-011-20190722 Revision date: 22 07 2019

¹⁹ 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 year²⁰;

²⁰ 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 In addition, we are currently in a period of extreme uncertainty both in terms of global events such as the war in Iran and also nationally in terms of the political landscape. Such uncertainty leads to a decrease in confidence in the market that further impacts on the delivery of windfalls sites in particular.

3.23 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.

3.24 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 17% (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
1703	1090	-613

Draft Allocations:

3.25 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.

- 3.26 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.
- 3.27 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.
- 3.28 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.
- 3.29 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.
- 3.30 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.
- 3.31 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
21,706	18,540	-3,166

(iii) Neame Sutton Assessment of Supply and Trajectory

Overall Housing Supply for the Proposed Plan Period:

- 3.32 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 2025	2489	2489	0
Large Sites Permitted but not Allocated	238	238	0
Small Sites Permitted with 17% Lapse Rate Applied	190	190	0
Windfall Allowance	1703	1090	-613
Proposed Housing Allocations	21706	18540	-3166
TOTAL Supply	26326	22548	-3628

- 3.33 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 **-3,628 dwellings** lower than the Council has identified.
- 3.34 Even if the Council's position is correct it generates a nominal surplus of only **150 dwellings**, which is less than 1% of the total minimum housing requirement set out in the draft Plan²¹. 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).
- 3.35 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.
- 3.36 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 **-3,628 dwellings (-**

²¹ Noting that this is reduced from the surplus of 203 dwellings identified by the Council at the Regulation 19 consultation stage

14%) 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 **-7,628 dwellings (-25%)**.

- 3.37 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:

- 3.38 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.
- 3.39 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.
- 3.40 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 4.53 years in 2029/30, which is poor.
- 3.41 The position when the correct housing requirement is applied is materially worse as Trajectory 3 in **Appendix 4** demonstrates.
- 3.42 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 2025, which equates to only 2.92 years.
- 3.43 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:

3.44 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 **-3,628 dwellings**;
4. When Annex 2 and Paragraph 75 are applied and the correct housing requirement the shortfall rises to **-7,628 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 1,886 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 3,600 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 7,600 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 2026)

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	44															44
	AS10	B	5															5
	AS11	B				10												10
	AS25	B	34															34
	AS28	B						9										9
	CCB1	A	12															12
	CCB3	A											13					13
	CCB4	B		61														61
	CCB7	A											9					9
	CCB8	A	164															164
	CCB12	B				18	6											24
	CCB15	B						22	22	16								60
	CCB19	A		13														13
	CCB20	A			45	45	45											135
	CCB21	A			14													14
	CCB24	A								9								9
	CCB27	B						18	2									20
	CCB30	B											18	3				21
	CCB31	A				18	22											40
	CCB37	B						44	44	44	44	24						200
	CCB39	B															24	24
	CCB41	A								7								7
	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						60	60	3								123
	FP12	B											18	18	18	16		70
	FP14	A		7														7
	FP16	A	6															6
	FP25	B											44	44	33			121
	GN3	B						44	44	44	44							176
	GN6	B						83	83	83	83	83	83	2				500
	GN8	B				17												17
	GS2	B											18	18	9			45
	GS4	A		24														24
	GS7	A	14															14
	GS14	A		6														6
	GN15	B						101	101	101	101	101	101	101	101	101	101	1010
	GS19	A					57											57
	GS23	A	5															5
	GS26	B				14												14
	GS35	B											12					12
	HHH5	B				18	18	14										50
	HHH6	B					83	83	83	83	83	83	52					550
	HHH8	B		70	70	70	70	70	70	30								450
	HHH11	B						60	60	60	60							240
	HHH12	B						188	188	188	188	188	188	188	188	188	108	1800
	HHH15	A	2															2
	HHH22 & 31	B						188	188	188	188	188	188	188	188	188	188	1880
	HHH24	B				18	18	18	18	13								85
	HHH25	A	50	50														100
	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	8	42	42	42							44	44	44	44	20	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	86	233	231	214	30											794
	LW7	A		100	100	100	100	50										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				18		15										33
	RN22	A											8					8
	RN23	A	14	61														75
	RN24	A	9															9
	RN25	A				5												5
	RN29	B				14												14
	RN28	A	48	14														62
	RN30	B		40	40	10												90
	RN31	B		40	40													80
	RN32	A	16															16
	RWB2	A					36											36

	RWB11	B	5															5				
	RWB12	B						3										3				
	RWB19	A	58					59	59	60	60								296			
	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	40	40	40	40	40	40	360				
	SNF3	B	20	75	75	75	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	6																6			
	SNF20	B	15															15				
	SNF23	A						8										8				
	SNF24	A	7																7			
	SNF27	A	13																13			
	SNF30	B						9										9				
	SNF31	A	8																8			
	SNF32	A	6																6			
	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	40	13																53		
	SR25	A	46	45	45	45												181				
	SR47	A																0				
	SR48	B																0				
	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	6																6			
	T3	A	19																19			
	W3	A																0				
	W4	B						5										5				
	W7	A	21																21			
TOTAL SUPPLY			904	1305	1092	1420	1455	2422	2040	1941	1484	1522	1483	1454	1070	1198	812	21602				

Table B - Proposed Site Allocations - Neame Sutton Adjustments

Proposed Site Allocations			Plan Period		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Commentary	
Address	Reference	Cat A/B	Years 1-5					Years 6-10					Years 11-15								
			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	44																	44	
	AS10	B	5																	5	
	AS11	B				10														10	
	AS25	B	34																	34	
	AS28	B							9											9	
	CCB1	A	12																	12	
	CCB3	A												13						13	
	CCB4	B		61																61	
	CCB7	A											9							9	
	CCB8	A	164																	164	
	CCB12	B				18	6													24	
	CCB15	B							22	22	16									60	
	CCB19	A		13																13	
	CCB20	A			45	45	45													135	
	CCB21	A			14															14	
	CCB24	A								9										9	
	CCB25	B							18	2										20	
	CCB27	B											18	3						21	
	CCB30	B				18	22													40	
	CCB31	A							44	44	44	44	24							200	
	CCB37	B																24		24	
	CCB39	B								7										7	
	CCB41	A							44	44	44	18								150	
	CCB49	B							18	18	13									49	
	CHR14	B				18	10													28	
	FP1	B							18	10										28	
Former University College for the Creative Arts			Application Pending: Ref: MC/25/0204 - Objection by Historic England 09 May 2025 regarding unresolved impact on SAM (Fort Pitt). Not currently deliverable. Therefore moved out of 5-year supply.																		
	FP6	B							102											102	
	FP10	B		139																139	
	FP11	B							60	60	3									123	
	FP12	B												18	18	18	16			70	
	FP14	A		7																7	
	FP16	A	6																	6	
	FP25	B												44	44	33				121	
	GN3	B							44	44	44	44								176	
Pier Road, Gillingham			No planning history or even a live planning application. Heavily contaminated site containing Gas Holders. No evidence in LAA of deliverability from promoter. LAA even confirms the site has viability issues affecting delivery. Does not meet deliverability test. Removed from 5-year period.																		
	GN6	B								100	100	100	100	100						500	
	GN8	B				17														17	
	GS2	B											18	18	9					45	
	GS4	A		24																24	
	GS7	A	14																	14	
	GS14	A		6																6	
	GN15	B							83	83	83	83	83	83	2					500	
	GS19	A					57													57	
	GS23	A	5																	5	
	GS26	B				14														14	

[illegible]

Appendix 2

Trajectory 1 - Council's position on supply and requirement with the application of a 20% buffer

Housing Trajectory 1 - COUNCIL POSITION - Sedgefield 20%



As at: 04-Jul-26

Supply Sources	Plan Period	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
		Years 1-5						Years 6-10					Years 11-15					
	Cat A/B	2025/26	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	691	388	442	387	243	100	130	100	8								2489
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238
Small Sites Permitted with 17% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191
Total from Proposed Allocations		104	904	1305	1092	1420	1455	2422	2040	1941	1484	1522	1483	1454	1070	1198	812	21706
Windfall Allowance					131	131	131	131	131	131	131	131	131	131	131	131	131	1703
TOTAL SUPPLY		841	1422.55	1912.604	1679.45	1798.98	1690.83	2683	2271	2080	1615	1653	1614	1585	1201	1329	950.47	26327
																		0
Requirement		1636	1636	1636	1636	1636	1636	1963	1963	1963	1963	1963	1309	1309	1309	1309	1309	26176
Annual Shortfall/Surplus		-795	-213	277	43	163	55	720	308	117	-348	-310	305	276	-108	20	-359	151
Cumulative Shortfall/Surplus		-795	-1009	-732	-689	-526	-471	249	557	674	326	16	321	597	489	509	151	
Base 5 Year Requirement		8180	8180	8507	8834	9161	9488	9815	9161	8507	7853	7199	6545	5236	3927	2618	1309	
Shortfall/oversupply (Sedgefield)		-795.4	-1008.8	-732.2	-688.7	-525.8	-470.9	249.1	557.1	674.1	326.1	16.1	321.1	597.1	489.1	509.1	150.5	
5 Year Requirement with Shortfall/oversupply		8975.4	9188.8	9239.2	9522.7	9686.8	9958.9	9565.9	8603.9	7832.9	7526.9	7182.9	6223.9	4638.9	3437.9	2108.9	1158.5	
Adjuste 5 Year Requirement with 20% Buffer		10770.4	11026.6	11087.0	11427.3	11624.1	11950.7	11479.1	10324.7	9399.5	9032.3	8619.5	7468.7	5566.7	4125.5	2530.7	1390.2	
Adjusted Annual Requirement (5yr)		2154.1	2205.3	2217.4	2285.5	2324.8	2390.1	2295.8	2064.9	1879.9	1806.5	1723.9	1493.7	1113.3	825.1	506.1	278.0	
5 Year Supply		7654.234	8504.414	9764.864	10123.26	10523.81	10339.83	10302	9233	8547	7668	7382	6679.47	5065.47	3480.47	2279.47	950.47	
Supply in Years		3.55	3.86	4.40	4.43	4.53	4.33	4.49	4.47	4.55	4.24	4.28	4.47	4.55	4.22	4.50	3.42	

Surplus/Shortfall Against Plan Requirement As a %		
	151	1%

- Notes:
- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
 - 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025
 - 3 Sedgefield 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 requirement with the application of a 20% buffer



Housing Trajectory 2 - NEAME SUTTON POSITION on Supply - Sedgefield 20% and 2025 based Std Method

As at: 04-Jul-26

	Plan Period	0	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						
	Cat A/'b	2025/26	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	691	388	442	387	243	100	130	100	8								2489		
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238		
Small Sites Permitted with 15% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191		
Total from Proposed Allocations		104	772	1065	787	995	867	1622	1530	1851	1542	1552	1409	1389	1055	1173	827	18540		
Windfall Allowance								109	109	109	109	109	109	109	109	109	109	1090		
TOTAL SUPPLY		841	1291	1673	1243	1243	972	1861	1739	1968	1651	1661	1518	1498	1164	1282	943.47	22548		
Requirement		1636	1636	1636	1636	1636	1636	1963	1963	1963	1963	1963	1309	1309	1309	1309	1309	26176		
Annual Shortfall/Surplus		-795.35	-345.45	36.604	-392.55	-393.02	-664.17	-102	-224	5	-312	-302	209	189	-145	-27	-366	-3628		
Cumulative Shortfall/Surplus		-795	-1141	-1104	-1497	-1890	-2554	-2656	-2880	-2875	-3187	-3489	-3280	-3091	-3236	-3263	-3628			
Base 5 Year Requirement		8180	8180	8507	8834	9161	9488	9815	9161	8507	7853	7199	6545	5236	3927	2618	1309			
Shortfall/oversupply (Sedgefield)		-795	-1141	-1104	-1497	-1890	-2554	-2656	-2880	-2875	-3187	-3489	-3280	-3091	-3236	-3263	-3628			
5 Year Requirement with Shortfall/oversupply		8975.4	9320.8	9611.2	10330.7	11050.8	12041.9	12470.9	12040.9	11381.9	11039.9	10687.9	9824.9	8326.9	7162.9	5880.9	4937.5			
Adjuste 5 Year Requirement with 20% Buffer		10770.4	11185.0	11533.4	12396.9	13260.9	14450.3	14965.1	14449.1	13658.3	13247.9	12825.5	11789.9	9992.3	8595.5	7057.1	5925.0			
Adjusted Annual Requirement (5yr)		2154.1	2237.0	2306.7	2479.4	2652.2	2890.1	2993.0	2889.8	2731.7	2649.6	2565.1	2358.0	1998.5	1719.1	1411.4	1185.0			
5 Year Supply		6290	6421	6992	7058	7783	8191	8880	8537	8296	7492	7123	6405	4887	3389	2225	943			
Supply in Years		2.92	2.87	3.03	2.85	2.93	2.83	2.97	2.95	3.04	2.83	2.78	2.72	2.45	1.97	1.58	0.80			

Surplus/Shor As a %
-3628 -14%

Notes:

- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
- 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025 and adjusted to reflect Annex 2 test of Deliverability and Paragraph 75 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: 04-Jul-26

	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	691	388	442	387	243	100	130	100	8								2489
Large SitesPermitted but not Allocated	B		60	117	57	0	4											238
Small Sites Permitted with 15% Lapse Rate Applied	A	46	71	49	12	5	0.83										7	191
Total from Proposed Allocations		104	772	1065	787	995	867	1622	1530	1851	1542	1552	1409	1389	1055	1173	827	18540
Windfall Allowance								109	109	109	109	109	109	109	109	109	109	1090
TOTAL SUPPLY		840.65	1290.55	1672.604	1243.45	1242.98	971.83	1861	1739	1968	1651	1661	1518	1498	1164	1282	943.47	22548
Requirement		1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	1886	30176
Annual Shortfall/Surplus		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	-7628
Cumulative Shortfall/Surplus		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	
Base 5 Year Requirement		9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	9430	7544	5658	3772	1886	
Shortfall/oversupply (Sedgefield)		-1045	-595	-213	-643	-643	-914	-25	-147	82	-235	-225	-368	-388	-722	-604	-943	
5 Year Requirement with Shortfall/oversupply		10475.4	10025.5	9643.4	10072.6	10073.0	10344.2	9455.0	9577.0	9348.0	9665.0	9655.0	9798.0	7932.0	6380.0	4376.0	2828.5	
Adjuste 5 Year Requirement with 20% Buffer		12570.4	12030.5	11572.1	12087.1	12087.6	12413.0	11346.0	11492.4	11217.6	11598.0	11586.0	11757.6	9518.4	7656.0	5251.2	3394.2	
Adjusted Annual Requirement (5yr)		2514.1	2406.1	2314.4	2417.4	2417.5	2482.6	2269.2	2298.5	2243.5	2319.6	2317.2	2351.5	1903.7	1531.2	1050.2	678.8	
5 Year Supply		6290	6421	6992	7058	7783	8191	8880	8537	8296	7492	7123	6405	4887	3389	2225	943	
Supply in Years		2.50	2.67	3.02	2.92	3.22	3.30	3.91	3.71	3.70	3.23	3.07	2.72	2.57	2.21	2.12	1.39	

Surplus/Shor As a %

-7628 -25%

Notes:

- 1 Annual Requirement and Stepped Trajectory from Housing Delivery Topic Paper - December 2025
- 2 Supply taken from Trajectory Evidence in Housing Delivery Topic Paper - December 2025 and adjusted to reflect Annex 2 test of Deliverability and Paragraph 75 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

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MEDWAY LOCAL PLAN 2041

REGULATION 22 SUPPORTING EVIDENCE CONSULTATION RESPONSE: HABITAT REGULATIONS ASSESSMENT

INTRODUCTION

These representations are made on behalf of Hallam Land in partnership with Tarmac and Holcim UK (as 'the Landowners') and in response to Medway Council's Regulation 22 consultation on updated and newly available Local Plan supporting evidence documents.

Hallam Land is working in partnership with the Landowners on a once-in-a-generation opportunity to repurpose Holborough Quarry (site CHR4) to deliver a sustainable, cross-boundary, new community of 2,000 new homes to meet identified needs in both Medway and neighbouring Tonbridge and Malling. 1,300 homes would be provided in within the Tonbridge and Malling part and 700 homes in the Medway part. That part of the site falling with Tonbridge and Malling is subject to a draft allocation for residential-led mixed use development in the emerging Tonbridge and Malling Local Plan.

These representations focus on the Submission Habitat Regulations Assessment ('HRA', document A4.1), with some reference to the supporting Air Quality Modelling for Ecology Assessment (A4.2) and Interpretation of Air Quality Modelling Data (A4.3). These representations should be read in conjunction with Hallam Land's wider submission relating to the Green Belt, transport, infrastructure and housing delivery.

A.4.1 SUBMISSION HABITAT REGULATIONS ASSESSMENT (HRA)

Procedure

The Submission HRA (December 2025) introduces material changes to the Regulation 19 Interim HRA (June 2025). The Interim HRA was unable to reach a conclusion on air quality and recreational impacts on relevant European sites without further evidence. Hallam Land and other consultees were therefore unable to consider in full the impact of the emerging Medway Local Plan on the integrity of relevant European sites.

The Submission HRA has assessed newly available evidence, including the Air Quality Modelling for Ecology Assessment (A4.2) and the Interpretation of Air Quality Modelling Data (A4.3) and subsequently presents new conclusions on that basis. We consider these changes to be significant to the soundness and legal compliance of the emerging Plan.

Air Quality

The Interim HRA was unable to reach a conclusion regarding potential adverse air quality impacts at the North Kent Marshes European sites and the North Downs Woodlands SAC due to the absence of supporting evidence. Since then, further air quality modelling has been undertaken to inform the HRA.

The Air Quality Modelling for Ecology Assessment (A4.2) and the Interpretation of Air Quality Modelling Data (A4.3) identify no adverse effects at the North Kent Marshes. However, at the North Downs Woodlands SAC, exceedances of Ammonia (NH₃), Nitrogen Deposition (N-dep) and Acid Deposition (A-

dep) occur within 200m of Lidsing Road. Paragraph 6.1.3 of the Interpretation of Air Quality Modelling Data (A4.3) then states that “*mitigation is required to ensure air quality does not undermine the SAC’s conservation objectives*”. Based on this updated data, the Submission HRA reaches a materially different conclusion in relation to air quality, confirming that the emerging Local Plan will result in adverse air quality impacts at the North Downs Woodlands SAC without adequate mitigation. Critically, such mitigation has not yet been secured.

The HRA acknowledges work being undertaken by Maidstone Borough Council (MBC) which indicates that a package of mitigation measures on Boxley Road/Lidsing Road has the potential to prevent adverse air quality effects. The two Councils are recommended to work together on a strategic approach to mitigation. However, the Submission HRA is clear that, in the absence of further evidence demonstrating that the proposed mitigation will be effective, it is not possible to reach a conclusion of no adverse impacts on site integrity (AIOSI).

This is a materially significant position. The Council’s spatial strategy effectively relies on allocations, specifically Capstone Valley (Policy SA7) (3,958 homes), that are subject to unresolved HRA impacts. This approach is not justified. The effectiveness of the proposed cross-boundary mitigation has not yet been demonstrated. The Statement of Common Ground with Maidstone Borough Council (A12.3) refers to “*ongoing cooperation to determine a strategic mitigation approach*”, but there is no clarity on timescales for agreeing this mitigation. The Council simply seeks to secure future mitigation through amendments to Policy SA7. This raises significant concerns regarding the deliverability of this allocation, especially in the context of the Council’s housing trajectory which suggests approximately 1,600 homes will come forward (parcels LW6, LW7, LW8) from this allocation within the first five years of the Local Plan. Furthermore, the viability implications of any such mitigation package has not been considered in the context of other infrastructure costs. The signed Statement of Common Ground with Maidstone Council (A12.3) confirms that this matter is unresolved but does not provide a date or detailed timetable for doing so.

The above demonstrates that there is a risk to the timing and deliverability of the Capstone Valley allocation. **The Council should therefore ensure that its trajectory reflects the uncertainty regarding delivery and ensures that a sufficient supply of alternative sites, including Holborough Quarry (CHR4) that would not result in any adverse impact on the North Downs Woodlands SAC, are allocated to meet overall housing needs.**

Recreation

The Interim HRA was also unable to reach a conclusion regarding potential adverse recreational pressure impacts at the North Kent Marshes. Paragraph 9.1.4 of the Interim HRA stated that “*a finalised Hoo Strategic Environmental Programme will be evaluated to inform a full AA*”.

The Submission HRA provides an updated position, reaching the conclusion that there is no adverse impacts on site integrity (AIOSI) at any European site based on “*mitigation contained in both Bird Wise and the Hoo Peninsula Strategic Environmental Programme [which] will be secured through existing MLP policy wording and the recommended policy amendments to Policy S2*” (Paragraph 7.2.40). We note, however, that Natural England has raised objection to the Policy determining that it fails to provide sufficient certainty and is inconsistent with the NPPF, and further note that it has not signed the proposed Statement of Common Ground with the Council.

Firstly, the Submission HRA relies on an emerging Hoo Peninsula Strategic Environmental Programme, not the finalised version that the Interim HRA required to inform a full AA. This is an inconsistent approach that has not been justified through the HRA. Instead, it is recommended that Policy S2 is updated to “*develop and secure*” the Hoo Programme (Paragraph E11), a document that will be agreed in partnership with Natural England and other environmental organisations; provide a strategic approach to protecting

and enhancing designated sites; and set out a programme of evidence-based measures (Paragraphs 7.2.22 – 7.2.24). This highlights that the mitigation measures are yet to be fully identified, let alone tested and costed, and therefore it is unclear how the Submission HRA has been able to reach a conclusion of no AIOSI based on mitigation that has not been finalised.

Secondly, the Bird Wise North Kent Strategic Access Management and Monitoring Strategy (SAMMS) was originally prepared in 2014. A Mitigation Strategy (2024 - 2029) was published in 2024. However, its purpose is to provide an update on progress and to set out how and where the mitigation measures identified in the original SAMMS strategy will be delivered over the five-year period. A full review of the SAMMS mitigation strategy, which will allow any recommended changes to be fully implemented and costed, is not expected until 2027. Hallam Land is therefore concerned that the package of measures set out in the 2014 SAMMS is not robust enough to sufficiently mitigate impacts from the scale of growth proposed over the Local Plan period.

Notwithstanding the above, the Submission HRA states that while the Bird Wise scheme is considered to provide appropriate mitigation across the majority of the Plan area (a statement we contend as discussed above), *"it may not completely address recreational impacts associated with allocations in close proximity to the North Kent Marshes"* (Paragraph 7.2.13). The allocations at Hoo Peninsula specifically will require an enhanced SAMMS+, in addition to the contributions towards the implementation of the Strategic Environmental Management Scheme (SEMS). It is worth noting that the Infrastructure Delivery Plan (IDP (B2) indicates an estimated cost of £25m for the SEMS to be funded through s106, while the enhanced SAMMS+ remains uncoded. With HIF Funding withdrawn in 2023, there are significant concerns over the impact on viability of the Hoo Peninsula allocations, and therefore their deliverability. We note that the Council's viability assessment (B5) has not been updated despite predating the findings of the December. It is not clear what SAMMS measures comprise, let alone SAMMS+, its effectiveness in reducing recreational pressures on the Marshes or whether this has been costed through the viability work undertaken, and how this is reflected in the Infrastructure Delivery Plan.

As discussed above, we strongly suggest that the Council broadens its allocations to include suitable and sustainable sites such as **Holborough Quarry (CHR4)**. **The site is not within close proximity of the North Kent Marshes and it is therefore not anticipated that additional mitigation in the form of an enhanced SAMMS+ will be required to mitigate any recreation impact.**

Summary

Overall, there is currently no scientific certainty that the proposed allocations would not result in an adverse impact on European sites. The proposed cross-boundary mitigation for adverse air quality impacts remains untested and uncoded. The reliance of allocations with unresolved HRA impacts is neither justified nor effective.

The mitigation relied upon to reach the conclusion of no adverse impact on recreational impacts is also not finalised (in the case of the aforementioned SEMS) and outdated (in the case of the SAMMS). The SEMS and enhanced SAMMS+ also remain uncoded. This approach is not justified.

Overall, the spatial strategy is over-reliant on sites with unresolved adverse HRA impacts and untested and uncoded mitigation strategies, including Capstone Valley (Policy SA7) (3,958 homes) and Hoo St Werburgh and Chattenden (Policy SA8) (5,300 homes) which together represent almost half of the Local Plan allocation supply (21,706 homes). This is neither justified nor effective. The Council exposes the emerging Local Plan to significant environmental and deliverability risks, which renders the Plan unsound as submitted.

We consider that the Local Plan could be made more resilient by allocating sites such as Holborough Quarry (CHR4) that are available, suitable, sustainable and deliverable, and that are not constrained by the same environmental risks set out above.

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MEDWAY LOCAL PLAN 2041

REGULATION 22 SUPPORTING EVIDENCE CONSULTATION RESPONSE: GREEN BELT EXCEPTIONAL CIRCUMSTANCES

INTRODUCTION

These representations are made on behalf of Hallam Land in partnership with Tarmac and Holcim UK (as 'the Landowners') and in response to Medway Council's Regulation 22 consultation on updated and newly available Local Plan supporting evidence documents.

Hallam Land is working in partnership with the Landowners on a once-in-a-generation opportunity to repurpose Holborough Quarry (site CHR4) to deliver a sustainable, cross-boundary, new community of 2,000 new homes to meet identified needs in both Medway and neighbouring Tonbridge and Malling. 1,300 homes would be provided in within the Tonbridge and Malling part and 700 homes in the Medway part. That part of the site falling with Tonbridge and Malling is subject to a draft allocation for residential-led mixed use development in the emerging Tonbridge and Malling Local Plan.

These representations focus on the Green Belt Exceptional Circumstances Topic Paper (B22.4) with some reference to the Inspector's initial questions (MLP/ED5) and the Council's response to the Inspector's initial questions on Green Belt (MLP/EDP7). These representations should be read in conjunction with Hallam Land's wider submission relating to Habitat Regulations Assessment (HRA), transport, infrastructure and housing delivery.

B22.4 GREEN BELT EXCEPTIONAL CIRCUMSTANCES TOPIC PAPER

Methodology of the Green Belt Review

The Inspectors have questioned the methodology of the Green Belt Review, and in particular the Council's approach to parcelling (Paragraph 22 of MLP/ED5). Hallam Land shares this concern and consider the Council's approach to be inconsistent with national policy. This undermines the robustness of the Green Belt assessment and therefore challenges its conclusions and the implications for the Plan.

The Council states in MLP/ED7 that parcelling was informed by Paragraph 004 of the Planning Practice Guidance (PPG) as it relates to the Green Belt. This is reiterated in the Topic Paper at paragraphs 4.1.1 and 4.1.2. However, Paragraph 004¹ of the PPG leans heavily towards granularity, stating clearly that *"assessment areas should be sufficiently granular"* and that *"a small number of large assessment areas will not be appropriate in most circumstances"*. Paragraph 004 also encourages local authorities to *"consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary"*.

The Council's approach to Parcels 15 and 20 is inconsistent with this guidance. The assessment of Parcel 15 draws substantially on the characteristics of the woodland towards Upper Halling, which performs Green Belt functions differently from the land at Halling New Town. Similarly, Parcel 20, which is disproportionally large in relation to other parcels, despite being varied in its character and physical features, cannot reasonably be assessed at the scale defined. We contend that, had Parcels 15 and 20 been disaggregated in line with Paragraph 004 of the PPG, then the land at Holborough Quarry (CHR4)

¹ Paragraph: 004 Reference ID: 64-004-20250225

would have been assessed more accurately and proportionately, especially as it relates to the PPG's guidance to identify areas of grey belt through appropriate disaggregation.

The Council also state that parcelling was informed by "*land being of similar use or landscape characteristics*" and/or "*clearly defined boundaries*". However, the Council's own Green Belt Review (B8) refers to several different land uses and a number of clear defining features that could have provided opportunity for smaller parcelling. Hallam Land argue that this approach is inconsistent with the Council's approach elsewhere, for example in relation to Parcel 4, where the GB Review states "*there isn't a robust barrier to the western boundary*" and yet Parcel 4 has not been merged with Parcel 3. **This inconsistency in assessing the Green Belt undermines the robustness of the overall methodology.** The approach is therefore neither justified nor consistent with national policy.

Strood West Release

The Council confirms in MLP/ED7 that it does not consider exceptional circumstances would exist to justify the release of Strood West (Policy SA6) if the adjoining Green Belt land in Gravesham (Chapter Farm) were not also released. The Council considers that "*if Gravesham did not release their Green Belt land, Medway's Green Belt would be performing its function as part of the larger Green Belt*". Therefore, Strood West and its 1,280 homes is contingent on Gravesham Borough Council (GBC) establishing its own exceptional circumstances for Chapter Farm.

Appendix 2 of MLP/ED7 provides correspondence from GBC stating that work to establish exceptional circumstances is still ongoing. This clearly confirms that such circumstances are yet to be demonstrated. Furthermore, GBC is currently undertaking a consultation on its Regulation 19 Proposed Submission Local Plan, and while the Chapter Farm site is proposed for allocation, there is notably no exceptional circumstances paper supporting its release. This position undermines GBC's overall approach, where a strategic Green Belt allocation is prematurely proposed ahead of the technical assessment required to support/justify its release. There is therefore uncertainty regarding the suitability of Chapter Farm as an appropriate allocation, and by consequence, Medway Council's premature reliance on the uncertain outcome of that process. **Medway has conversely discounted the progress made by Tonbridge and Malling in its emerging Local Plan.**

Furthermore, there is a clear disconnect in the methodology and judgement applied by the two local authorities for the Green Belt land at their boundaries. GBC's Green Belt evidence (Gravesham Stage 2 Green Belt Study, August 2020) identifies that the release of the majority of the land at Chapter Farm (GB parcel TC2) will result in 'high' levels of harm to the Green Belt. By contrast, Medway's Green Belt Review assesses the adjoining land (GB parcels 2 and 3) as only making a 'moderate' contribution to the Green Belt. An agreed position between the two authorities is not recorded in the meeting minutes at Appendix 2 of MLP/ED7. This is not indicative of effective cross-boundary engagement.

The Council also states in MLP/ED7 that "*Chapter Farm (Gravesham's part of the cross-boundary site allocation) presents the most sustainable option to meet Gravesham's development needs within their emerging Local Plan strategy*". It is unclear how Medway has reached this conclusion given GBC's Sustainability Appraisal has not yet been published at the time of writing (June 2026).

The Council states in MLP/ED7 that, should Gravesham release Chapter Farm, the residual Medway Green Belt would no longer be able to perform its function, leaving only some 16% of the parcel. An equivalent assessment has not been extended to Holborough Quarry, having regard to the adjoining allocation proposed in Tonbridge and Malling Borough Council (TMBC)'s emerging Local Plan.

The newly published Green Belt Exceptional Circumstances Topic Paper (B22.4) also indicates that Strood West performs well in sustainability terms due to its access to the A289 and the M2 and its location on

the urban edge of Strood District Centre. However, the assessment relies on the delivery of additional bus rapid transit services which remain unfunded following the withdrawal of HIF funding in 2023.

The Green Belt Topic Paper does not address these issues and does not substantiate the methodology used to deal with cross-boundary matters. **Overall, Hallam Land is concerned that the spatial strategy relies on Green Belt release that is contingent on an untested neighbouring Green Belt release. This is neither justified nor effective. We therefore strongly suggest that the Council gives due consideration to other suitable strategic sites such as Holborough Quarry (CHR4).**

Holborough Quarry (CHR4)

The Green Belt Exceptional Circumstances Topic Paper (Paragraph 3.1.6 of B22.4) states that the *"inclusion of the Medway part of this promoted cross border site could lead to coalescence"*. Hallam Land has previously contested this position as part of its Regulation 19 consultation response. Indeed, the Council's own Green Belt Review confirms that the relevant parcels could be developed *"without loss of visual separation between the towns"*.

Notwithstanding the above, Hallam Land is concerned with the Council's inconsistent approach with other sites. The draft policy for Strood West (Policy SA6) adopts a landscape-led design approach in order to *"maintain the identity of the rural settlement of Three Crutches"*. While this approach is considered appropriate, it is concerning that the same principle has not been extended to Holborough Quarry, where a perceived risk of coalescence has been treated as an absolute constraint.

Medway acknowledge that TMBC have proposed the adjoining land for allocation. TMBC's Regulation 18 consultation commenced in November 2025 and included its Green Belt Review which identified the adjoining land as grey belt. Medway confirm that they did not raise any objections. Hallam Land suggests that, had the Council engaged more proactively with TMBC, there would have been an opportunity to respond positively to updated and material change in circumstances. This demonstrates a clear inconsistency in approach between the engagement undertaken with GBC and that undertaken with GMBC, an inconsistency that undermines the Local Plan's ability to be positively prepared.

In the Green Belt Exceptional Circumstances Topic Paper, the Council also refers to the Lower Thames Crossing (LTC) as a reason to limit growth in the Medway Valley. Notwithstanding that this is an issue unrelated to Green Belt matters and which should not therefore be referenced, our Regulation 19 transport representations (DHA, August 2025) demonstrate that any adverse effects are overstated that the A228 Peter's Bridge Roundabout is shown to continue to operate within capacity. The site is also highly accessible given its proximity to peak-time high speed rail services to London. Whilst the Council has taken the opportunity to correct boundary anomalies, it has failed to correct the erroneous reference to the Lower Thames Crossing and therefore undermines the appraisal of the site.

Summary

Overall, the Council's Green Belt evidence highlights a number of inconsistencies and omissions which the Topic Paper has failed to address. The spatial strategy relies on an exceptional circumstances case in Gravesham that is yet to be established. The Council also relies on assertions that have not been demonstrated, such as claims that Chapter Farm is the "most sustainable" location for development where Gravesham's Sustainability Appraisal is not yet available, and that Strood West is highly sustainable when the allocation relies on a BRT service that remains unfunded.

Hallam Land contends that the Council has not responded to material changes in circumstances as it relates to TMBC and its Regulation 18 consultation. There has been an inconsistent approach to matters relating to Holborough Quarry (CHR4) compared to Strood West, such as how coalescence is treated. This is not justified. The Council's parcelling methodology is also inconsistent with national policy.

Given the limited resilience in the Council's supply, we consider that the Plan's soundness could be made robust by allocating land at Holborough Quarry (CHR4), which is available, suitable, sustainable and deliverable.

RU/HLM088

MEDWAY LOCAL PLAN 2041

REGULATION 22 SUPPORTING EVIDENCE CONSULTATION RESPONSE: INFRASTRUCTURE AND HOUSING DELIVERY

INTRODUCTION

These representations are made on behalf of Hallam Land in partnership with Tarmac and Holcim UK (as 'the Landowners') and in response to Medway Council's Regulation 22 consultation on updated and newly available Local Plan supporting evidence documents.

Hallam Land is working in partnership with the Landowners on a once-in-a-generation opportunity to repurpose Holborough Quarry (site CHR4) to deliver a sustainable, cross-boundary, new community of 2,000 new homes to meet identified needs in both Medway and neighbouring Tonbridge and Malling. 1,300 homes would be provided in within the Tonbridge and Malling part and 700 homes in the Medway part. That part of the site falling with Tonbridge and Malling is subject to a draft allocation for residential-led mixed use development in the emerging Tonbridge and Malling Local Plan.

These representations focus on the Infrastructure Delivery Plan (IDP) (B2) and the Housing Delivery Topic Paper (B22.5) and should be read in conjunction with Hallam Land's wider submission relating to the Habitat Regulations Assessment (HRA), Green Belt and transport.

B2 INFRASTRUCTURE DELIVERY PLAN (IDP)

The Submission IDP (B2) has been materially updated since the version of the IDP published for consultation as part of the Regulation 19 consultation.

Firstly, the Infrastructure Delivery Schedule (IDS) at Appendix 1 has been expanded to include a significant number of additional transport costs, including the M2 J1 mitigation scheme discussed in our transport representations (although notably the £3.2 - £12.1m cost is not specifically referenced); the Blue Bell Hill Improvement Scheme (uncosted, critical); the Hoo Peninsula Sustainable Travel Programme (£1.1m, essential); the Hoo bridleway creation (£2m, essential); the Hoo A228 Green Bridge (£4m, desirable); and the Strood to Hoo Bus Rapid Transit (BRT) (uncosted, critical). Notably, the potential funding source for majority of these schemes remains a combination of s106 contributions and external funding yet to be identified. It is noted that the "funding identified" column in the previous IDP has been deleted, which further highlights that majority of costs remain unfunded. This is highly concerning for the deliverability of the Local Plan, especially given the IDP's own admission that "*transport mitigations [especially] upgrades to major junctions will likely require additional support through external funding*".

Notwithstanding the expanded IDS, the IDP remains incomplete with a number of estimated costs not directly referenced in the Schedule. As above, the M2 J1 mitigation requirement is identified but without specific reference to the cost estimate provided by Jacobs. The M2 J4 mitigation requirement is carried forward from the previous IDP, but the Jacobs estimate of £4.3m-£18.9m is again not reflected. The environmental mitigation associated with air quality and recreational pressures (as per our HRA representations) have not been fully established and therefore remain uncosted/unreferenced. Therefore, the IDP is not consistent with the Council's own updated environmental and transport evidence.

The IDP is supported by a Developer Contributions and Obligations Guide (B4) which states that, currently, "*developers are requested to pay around £17,000 (excluding health contributions) per dwelling*".

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in S106 contributions to deliver the necessary infrastructure on non-strategic sites". This does not include highways, Public Right of Way (PRoW), or public realm. Strategic sites are considered on a case-by-case basis. It is unclear whether the Council's viability work has been updated to consider the impact of the baseline s106 per dwelling costs in combination with a proportionate cost for delivering the extensive scheme of transport mitigation works required to support the Local Plan. In the absence of this work, the deliverability of the relevant Local Plan allocations remains questionable. Separately, we also note that Table 1 (Summary of Contributions) of the Guide refers to a cost of "£46,3550.56" for new build secondary school provision which appears to be an error.

The IDP has also materially changed its position on rail provision. The Regulation 19 IDP considered the reinstatement of passenger services on the Hoo Peninsula freight line, stating that *"investment would be required in infrastructure to reinstate passenger services, reduce traffic and provide better connectivity from the Hoo Peninsula"*. The IDP also discussed a Network Rail concept for a *"new interchange station at Strood which would provide improved connectivity locally, within Strood, but also providing access to the London Victoria services from a new high-level station"*. The Submission IDP scales back these ambitions, removing reference to the reinstatement of passenger services at Hoo Peninsula and focusing on safeguarding land for new rail infrastructure to *"facilitate and increase rail freight"*.

While the principle of an updated position is accepted, it is imperative that these changes are reflected in the underlying sustainability assessment of sites reliant on this infrastructure to ensure that new evidence is captured appropriately. **If this infrastructure was considered necessary to ensure proposed allocations meet sustainable transport objectives, those sites and their ability to achieve the Vision's stated aim for "Improved travel choices and infrastructure have reduced the use of the car" must be considered in light of the revised and more limited infrastructure package proposed. Indeed, they should not be allocated ahead of other more sustainable locations such as Holborough Quarry (CHR4), which has excellent connectivity to existing public transport services and active travel routes.**

B22.5 HOUSING DELIVERY TOPIC PAPER

Plan Period

The Inspectors have queried whether the Local Plan provides for the 15-year period from adoption as required by the NPPF (MLP/ED5). The Council has responded by revising the plan period from 2026/27-2040/41 to 2025/26-2040/41. However, we do not consider that this addresses the Inspectors' concerns, especially considering that adoption is unlikely to occur in 2026. We therefore consider that the plan period should be extended to ensure that the Local Plan is consistent with national policy.

Resilience of supply

Without prejudice to our comments above, the Council can currently demonstrate a nominal surplus supply of 150 homes against its current housing requirement. Table 1 of the Housing Delivery Topic Paper states that the housing requirement is 26,176 homes, of which the required yield of allocated sites is 21,556 while the actual yield of allocated sites is 21,706 homes. This provides very limited resilience, particularly in the context of the matters raised in our representations regarding the unresolved HRA air quality impact and the unfunded transport infrastructure. There are significant concerns over the deliverability of the Hoo St Werburgh and Chattenden (5,300 homes) and Capstone Valley (3,958 homes) allocations, which places significant pressure on an already constrained supply. The Council relies on these allocations to deliver almost half of its housing requirement. This exposes the Local Plan to significant risk, should any of these sites be found to be unsound or their delivery trajectory materially delayed.

Housing trajectory

The housing trajectory makes optimistic assumptions that are not adequately evidenced. As discussed in our transport representations, both the Hoo St Werburgh and Chattenden (Policy SA8) and Capstone Valley (Policy SA7) allocations are expected to deliver first completions within the first year of the Local Plan, despite significant unresolved environmental and transport constraints. This is unrealistic and undermines the robustness of the trajectory.

At Hoo St Werburgh and Chattenden, the Council anticipates that parcels HHH12 and HHH/22/31 are capable of delivering 188dpa each from Year 6 onwards. However, there is no allowance for a build-out curve typically expected from a strategic site, where delivery is initially slower before building up to peak delivery rates. Lichfields' research also indicates that sites of 1,500 – 1,999 dwellings (as these parcels are) typically deliver 130 dwellings per annum (dpa).

At Capstone Valley, annual delivery rates are assumed to exceed 200 dwellings per annum, without evidence that this build-out rate is achievable given the site's specific context. Similarly, at the River Waterfront, parcel SM16 is projected to reach build-out rates of some 350 dwellings per annum without any supporting evidence.

Based on the matters set out above, and in the rest of our representations, we set out below our updated position regarding the supply that could reasonably be expected from relevant allocated sites within the plan period, and in particular with reference to deliverability within the first five years.

Source	Medway supply	Hallam supply (Reg 19)	Hallam supply (Reg 22)
Chatham Town centre	1,350	1,350	1,350
Interface Land	150	150	150
Star Hill to Sunpier	474	474	474
Gillingham District Centre	100	100	100
River Waterfront	4,197	4,197	3,450*
Strood Town Centre and Surrounds	1,079	1,079	1,079
Land West of Strood	1,280	1,280	1,280**
Capstone Valley	3,958	3,958	3,183***
Hoo St Werburgh and Chattenden	5,300	3,855	3,400****
High Halstow	820	820	820
Lower Rainham	750	750	750
7 allocations at rural settlements	566	283	283
23 disparate individual site allocations	881	440	440
Frindsbury Peninsula Opportunity Area	690	350	350

Source	Medway supply	Hallam supply (Reg 19)	Hallam supply (Reg 22)
Pipeline	1,762	1,762	1,762
Windfall	1,584	1,584	1,584
Total	24,941	21,670	
Shortfall against LHN / requirement	1,235	4,506	

* To reflect more realistic rates of delivery (188dpa) based on Lichfields' research.

** Subject to Gravesham Borough Council being able to provide evidence establishing exceptional circumstances for the release of the adjoining GB land (please refer to our Green Belt representations).

*** To reflect more realistic rates of delivery (130dpa) based on Lichfields' research, and limited potential to deliver within the first five years of the Local Plan for sites still subject to planning permission (please refer to our HRA and transport representations).

**** To reflect more realistic rates of delivery (130dpa) based on Lichfields' research, and limited potential to deliver within the first five years of the Local Plan for sites still subject to planning permission (please refer to our HRA and transport representations).

Summary

Overall, the Council's IDP remains incomplete and inconsistent with the Council's wider evidence base. A significant amount of transport costs remain unfunded, including those supporting allocations expected to deliver first completions within the first five years of the Local Plan. The housing trajectory is unrealistic and does not reflect the significant environmental and transport constraints highlighted through the Council's own evidence base. This undermines the robustness of the IDP, housing trajectory and underlying viability assessment supporting the Local Plan. **Over-reliance on affected allocations is neither justified nor effective and provides no certainty that the Vision's aim for "Housing and economic development needs have been met in full" will be realised.**

The Council urgently needs to consider opportunities to make the Local Plan more resilient, especially in the context of the plan period likely requiring further amendment. Holborough Quarry (CHR4) provides a once-in-a-generation cross-boundary opportunity to deliver a sustainable community, and the land is available, suitable, sustainable and deliverable. The site is not constrained by the environmental and transport matters affecting other sites. **We therefore strongly suggest that the Council considers the site for allocation to bolster its supply position, especially given the exclusion of the site is not justified based on the Council's own evidence.**

RU/HLM088

Planning Policy Team
Medway Council
Gun Wharf
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ME4 4TR

Helen Leydon

[REDACTED]
ME2 [REDACTED]

06/07/2026

Subject: Follow-up Formal Objection – Proposed Removal of Land North of Brompton Farm Road from the Green Belt

Dear Planning Policy Team,

Further to my previous formal objection, I wish to submit this additional representation in light of newly published evidence, further consideration of the Local Plan documents and wider concerns regarding affordability, infrastructure and public confidence.

Having reviewed the recently published Green Belt Exceptional Circumstances Topic Paper, I remain unconvinced that Medway Council has demonstrated the exceptional circumstances required by the National Planning Policy Framework (NPPF) to justify the removal of land north of Brompton Farm Road from the Green Belt.

Rather than addressing the detailed concerns raised by local residents, the Topic Paper largely repeats broad policy statements without providing robust site-specific evidence to justify why this particular parcel of Green Belt should be released.

Failure to Address Public Objections

The Council acknowledges that significant objections were received concerning:

- the loss of Green Belt;
- the loss of productive farmland;
- biodiversity impacts; and
- the lack of exceptional circumstances.

However, the paper does not meaningfully respond to these concerns. Instead, it simply states that they have been noted before reaching the same conclusion.

This falls well short of demonstrating that residents' concerns have been properly considered.

Affordable Housing is Not the Primary Issue

One of the principal justifications for releasing Green Belt land is the need to deliver additional housing.

However, the current market suggests that housing supply alone is not the primary issue.

As of today, **Rightmove advertises approximately 1,961 residential properties for sale across Medway**, including:

- **1,298 houses**
- **approximately 500 flats and apartments**
- **approximately 160 park homes, retirement properties and other residential accommodation**
- **around 110 shared ownership properties**

Furthermore, there are already significant numbers of lower-priced homes available:

Price Band	Approximate Listings
Shared Ownership	110
Under £100,000	50
£100,000–£200,000	260
£200,000–£300,000	470

This demonstrates that hundreds of properties already exist within price ranges traditionally considered more affordable.

The real challenge is not a lack of homes for sale.

The challenge is affordability.

The Cost of Living Crisis Has Changed the Market

Since 2022, prospective buyers have experienced unprecedented financial pressures.

Typical mortgage interest rates have increased from around **1–2%** to approximately **4.5–5%**, significantly increasing monthly repayments.

Personally, my own mortgage repayments have increased by **over 60%** in the last three years.

During the same period:

- Council Tax has increased by approximately **25%**
- gas and electricity costs have risen substantially
- household insurance costs have increased significantly
- food prices have risen considerably

These factors have substantially reduced mortgage affordability.

Consequently, many households who could previously purchase a home can no longer satisfy lenders' affordability assessments.

This explains why Medway is experiencing increasing levels of homelessness despite a large number of properties already being available for sale.

The issue is therefore affordability - not simply housing numbers.

Before permanently sacrificing protected Green Belt land, greater emphasis should be placed on addressing the wider causes of housing insecurity through measures that improve affordability, reduce the cost of living and support existing residents.

Infrastructure Concerns Continue to be Ignored

Perhaps the greatest concern amongst local residents remains infrastructure.

These concerns have consistently been raised throughout every consultation and public meeting, including the Local Plan meeting held on **7 August 2025**.

Yet the Topic Paper provides little evidence that these issues have been resolved.

Existing problems include:

- severe congestion across the local highway network
- overcrowded commuter rail services
- limited GP and NHS dental capacity
- pressure on local schools
- insufficient water infrastructure

The recent **hosepipe ban across Kent** illustrates the growing pressure on regional water resources and highlights wider concerns regarding long-term infrastructure resilience.

It is difficult to understand how thousands of additional homes can be supported when existing infrastructure is already struggling to meet current demand.

Public Trust

Perhaps most disappointing is the apparent contradiction between the current proposals and previous public commitments made by local elected representatives.

During previous election campaigns, residents were repeatedly assured that Green Belt land would be protected and that overdevelopment would be resisted.

Those commitments encouraged many local residents to place their trust in elected representatives.

Indeed, the **Strood North and Frindsbury Spring Newsletter** produced by Medway Labour emphasised protecting local communities, recognising infrastructure pressures and responding to residents' concerns.

The proposed removal of Brompton Farm Road from the Green Belt appears fundamentally inconsistent with those earlier commitments.

Whether or not that was the intention, many residents now feel that promises made during the election period have not been honoured.

That perception risks undermining confidence in both the Local Plan process and local democratic accountability.

Green Belt Exceptional Circumstances Have Still Not Been Demonstrated

Having reviewed the Green Belt Exceptional Circumstances Topic Paper, I remain unconvinced that exceptional circumstances have been demonstrated.

In particular, the Council has failed to provide convincing evidence that:

- every reasonable brownfield opportunity has been exhausted
- higher-density urban alternatives have been fully explored
- the permanent loss of productive agricultural land is justified
- biodiversity impacts have been adequately assessed
- this specific parcel should be released in preference to any other Green Belt land

The paper largely presents conclusions rather than detailed evidence.

Conclusion

For all of these reasons, I respectfully request that the Inspector gives significant weight to these additional representations.

The proposed release of land north of Brompton Farm Road would permanently remove protected Green Belt land despite substantial unresolved concerns regarding infrastructure, environmental harm, affordability, public trust and compliance with national planning policy.

I therefore respectfully request that:

- Land north of Brompton Farm Road remains designated as Green Belt;
- the proposed Grey Belt designation is removed;
- the Strood West allocation is reconsidered in light of the significant evidence and objections submitted by local residents.

Yours faithfully,

Helen Leydon

From: [REDACTED]
To: [policy, planning](#)
Subject: Further Representation in Objection to Medway Council's Draft Local Plan – Additional Supporting Documentation
Date: 06 July 2026 17:59:16
Attachments: [text.txt](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Further Representation in Objection to Medway Council's Draft Local Plan – Additional Supporting Documentation

I wish to submit the following further representations in objection to Medway Council's Draft Local Plan and the additional supporting documentation that has recently been published.

Review of Updated Strategic Flood Risk Data and Implications for the Regulation 19 Sustainability Appraisal

The publication of updated strategic flood risk information at this stage raises concerns about the robustness of the evidence base. Given the significance of flood risk to the soundness of the Local Plan, this assessment should have been completed and made available at an earlier stage to enable meaningful public consultation.

Residents already experience significant water-related issues, even in areas that are not classified as being at flood risk. For example, following the completion of recent housing developments near Town Road in Cliffe Woods, neighbouring parts of the village experienced serious water supply problems late last year.

Furthermore, parts of Strood already suffer from flooding. Until these existing issues have been satisfactorily addressed, it is difficult to justify allocating further housing development that has the potential to place additional pressure on drainage infrastructure and increase flood risk.

Playing Pitch Strategy

The football ground in Strood remains at risk from proposed housing allocations within the draft Local Plan. Even if the playing pitches themselves are ultimately retained, the surrounding residential development is likely to increase pollution, traffic and environmental pressures, reducing the quality of this important recreational facility.

Built Facilities Strategy

Paragraph 8.3 states that the Council's vision is for Medway to deliver

high-quality development and environments that promote healthier, happier communities.

Many residents do not believe the scale of housing proposed will achieve this objective. Existing public services are already under considerable strain. Families experience difficulties obtaining school places, including specialist educational provision. Access to healthcare, particularly NHS dentistry, remains inadequate, while road maintenance and public transport continue to fall below the standard expected of a growing population.

Without substantial investment in infrastructure before further large-scale housing is delivered, these developments are likely to reduce rather than improve residents' quality of life.

Paragraph 8.10 refers to higher water efficiency standards for new homes, reducing consumption from 125 litres to 110 litres per person per day. Whilst improved water efficiency is welcome, it does not resolve the wider issue of regional water supply.

As highlighted in the attached correspondence from South East Water, forecasts indicate that water demand in the South East could exceed available supply as early as 2030. It would therefore be irresponsible to approve substantial housing growth before sufficient long-term water infrastructure is secured.

This concern is reinforced by statements made by Helen Whately, who stated that new homes should not be built where the supporting water infrastructure is not in place.

B22.4 – Green Belt

Residents were not adequately consulted regarding the proposed reclassification of Green Belt land as Grey Belt.

The consultation process has lacked transparency and accessibility. Information has often been communicated through limited channels, such as occasional social media posts or email updates, which many residents—particularly older members of the community—may not access. In addition, much of the documentation is highly technical and difficult for members of the public to understand without specialist planning knowledge.

Given the significance of these proposed changes, there should have been a far more robust and inclusive consultation process.

Facilities Planning Model

The existing infrastructure serving Medway is already under considerable pressure. Until sufficient healthcare, education, transport and utility infrastructure has been delivered to meet current demand, additional large-scale housing allocations should not proceed.

MLP/ED7 – Green Belt

The Green Belt land at Strood is productive agricultural land and forms an important part of the local landscape. It is also crossed by a strategic aviation fuel pipeline serving major airports, demonstrating that this land already performs significant strategic functions.

The Green Belt designation should therefore be retained.

Development of this land would also increase the risk of coalescence between Strood and Gravesham, eroding the distinct identity and character of both communities. Maintaining a clear separation between settlements is a long-established planning objective and remains important.

Overall Comments

The publication of significant supporting evidence at such a late stage raises concerns that the evidence base underpinning the Local Plan has not been fully developed before consultation. This undermines confidence that the Plan has been prepared in accordance with the principles of sound plan-making.

Many of the proposed development sites comprise Green Belt land. Once these landscapes are lost to development, they cannot realistically be restored. They provide agricultural value, support biodiversity, contribute to climate resilience and offer important benefits to residents' health and wellbeing.

The cumulative impact on Medway's transport network has also not been adequately addressed. The recent closure of the Medway Tunnel following damage caused by a lorry demonstrated how vulnerable the highway network already is, resulting in widespread congestion across surrounding roads.

The A2, M2 and Wainscott Bypass already experience severe congestion on a daily basis. These routes have also been the location of numerous serious road traffic collisions over recent years. Significant additional

housing will inevitably generate further traffic, increasing congestion and placing additional pressure on an already constrained network.

Before allocating further large-scale housing growth, priority should be given to delivering the infrastructure necessary to support existing communities, including improved healthcare provision, education, water infrastructure and transport capacity. Only then should the need for further housing allocations be reassessed.

Finally, I urge the Inspector to give significant weight to the consistent message from local residents. Throughout the preparation of this Local Plan, communities have repeatedly expressed clear and sustained opposition to the scale and location of the proposed development. These concerns should be afforded proper consideration when assessing whether the Plan is justified, effective and capable of delivering sustainable development.

Regards

Lee Squires

[REDACTED]
[REDACTED]
[REDACTED]
ME2 [REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [policy, planning](#)
Subject: Local Plan - Additional papers
Date: 06 July 2026 18:13:17

Recreation fields - There are two in Halling ownership and one in Medway ownership that are not equipped for sports.

Tonbridge and Malling Local Plan - development sites proposed in their local plan border on Medway/Halling and are expected to impact the parish. The proposals are to the north of Snodland and it is likely they will have an impact on Lower Halling with pressure on local amenities, including water from South East Water with (current shortages and regular water leaks). Additional GP services were proposed in early plans for the St Andrews Estate, but never delivered - additional pressure can be expected at the Halling surgery. Increased traffic can be expected on an already congested A228 leading to rat-running through the villages of Lower and Upper Halling. Amenity land to the north was agreed as part of the St Andrews estate but never delivered.

The MOUND in Medway ownership is poorly maintained and not currently in a condition to serve current and future residents.

--

Chris Fribbins, Clerk
Halling Parish Council
The Community Centre
High Street, Halling, ME2 1BS
[REDACTED]



Our ref: #27142
Your ref: Medway Local Plan 2041 supporting
evidence documents consultation

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**FAO: Planning Policy team
Medway Council**

Tel: 0300 470 1046

6 July 2026

Dear Planning Policy team

Medway Local Plan 2041 supporting evidence documents consultation

Thank you for inviting National Highways (NH) to comment on the Medway Local Plan 2041 supporting evidence documents consultation. We note that various documents supporting the Local Plan have been added or amended to the list after the Regulation 19 Local Plan consultation in summer 2025. And that your Local Plan Inspector has asked you to formally consult on these documents ahead of your examination. The consultation period ends at 11.59pm on 6 July 2026.

Policy Context

As I am sure you are aware, NH is responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability and operational efficiency. In the vicinity of Gravesham, the SRN comprises the A2 from the A2 Hall Road junction up to and including M2 Junction 1.

The policy of the Secretary of State for Transport in relation to the SRN is Circular 1/2022 (C1/22): *Strategic road network and the delivery of sustainable development* <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development> . In responding to this consultation, NH has taken C1/22 as relevant national policy alongside the NPPF.

In accordance with national planning and transport policy we expect the plan-making process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.

NH is obliged to raise any concerns with regards to any unacceptable safety or congestion impacts on the SRN.

Current Consultation

National Highways has been consulted by Medway Council at several points during the preparation of the submitted Local Plan. This has included formal consultation at the Regulation 18 and Regulation 19 stages, and additional direct discussions (which have also included KCC Highways and their appointed consultants Jacobs) prior to the formal consultations. These discussions have informed the scope and content of the technical evidence which has been developed to inform and support the Local Plan itself, and we have provided feedback on a number of the documents which are now presented as part of the evidence base to support the Plan which has been submitted for Examination.

We consider that the following documents within the Examination Library concern matters which are of relevance to National Highways:

Examination Reference	Document Title	Document Date
B18.1	Strategic Transport Assessment - Forecasting Report	15/12/2025
B18.2	Strategic Transport Assessment - Mode Shares and Trip Rate Assessment Tool	31/01/2025
B18.3	Strategic Transport Assessment - Mode Share Strategy	29/05/2025
B18.4	Strategic Transport Assessment - Merge Diverge Assessment	16/12/2025
B18.5	Strategic Transport Assessment - M2 Junction Analysis Technical Note	15/12/2025
B18.6	Strategic Transport Assessment - Proportionality Assessment	15/12/2025

B18.7	Strategic Transport Assessment - Junction Modelling and Mitigation Report	15/12/2025
B18.8.1	Strategic Transport Assessment - M2 Junction 1 Design Review	No Date
B18.8.2	Strategic Transport Assessment - M2 Junction 1 Safety Review	21/10/2025
B18.8.3	Strategic Transport Assessment - M2 Junction 1 Cost Estimate Report	30/10/2025
B18.9	Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report	10/11/2025
B18.10	Strategic Transport Assessment - Forecasting Methodology Report	12/01/2024
B18.11	Strategic Transport Assessment - Local Model Validation Report	12/01/2024
B18.12	Strategic Transport Assessment - Data Collection Report	Dec-23

National Highways' most recent formal consultation response was made to the Regulation 19 consultation in August 2025. Versions of examination library documents B18.1 to B18.7 and B18.10 to B18.12 were appraised and referenced in the National Highways Regulation 19 consultation response.

Documents B18.8.1 to B18.8.3 and B18.9 were not included in the Regulation 19 supporting information; however, National Highways has been consulted directly during the preparation of these documents.

We have noted that several of the documents have been issued for the submission for examination as versions which supersede those presented at Regulation 19. We have therefore conducted a further review of the documents listed above against our previous Regulation 19 comments, or other discussions with Medway Council regarding those documents which were not part of that consultation. Our position on each document as issued for inclusion in the examination library is briefly set out below.

We have first addressed documents B18.1 to B18.7 and B18.10 to B18.12, followed by documents B18.8.1 to B18.8.3 and B18.9.

B18.1 Strategic Transport Assessment - Forecasting Report: Minor formatting amendments have been made to the report, the assessments within the report remain as per those presented at Regulation 19. Our Regulation 19 response indicates that we are content with the analysis and the conclusions drawn and our position remains as such.

B18.2 Strategic Transport Assessment - Mode Shares and Trip Rate Assessment Tool: Minor formatting amendments have been made to the report, the material within this report details technical work which was principally undertaken at an earlier stage in the process (as evidenced by its issue date) and as such has not altered since its contents were reviewed and agreed to support subsequent technical exercises. We are content with the analysis and have no outstanding comments.

B18.3 Strategic Transport Assessment - Mode Share Strategy: The material within this report details technical work which was principally undertaken at an earlier stage in the process (as evidenced by its issue date) and as such has not altered since its contents were reviewed and agreed to support subsequent technical exercises. We are content with the analysis and have no outstanding comments.

B18.4 Strategic Transport Assessment - Merge Diverge Assessment: Minor formatting amendments have been made to the report. Our Regulation 19 consultation response noted the following:

‘The M2J1 EB merge (on-slip) is currently a type D layout; as a result of Local Plan traffic being added, this requirement changes to a type E layout. The A289 southbound merge changes from a Type A1 to a Type D as a result of the inclusion of LTC traffic, this does not increase further as a result of Local Plan traffic.

*It is therefore proposed that the Local Plan should provide mitigation for the M2 J1 Eastbound Merge. A concept mitigation design has been prepared by Stantec; Jacobs (the authors of this report) have confirmed that this layout does not introduce the need for any relaxations or departures (but have not examined the scheme in more detail). **The concept mitigation has not as yet been submitted formally to National Highways for discussion and it is expected that this will need to occur between the Regulation 19 consultation and submission of the plan for Examination.***

The submitted document B18.4 presents the same data and conclusion in relation to the eastbound merge as is present in the Regulation 19 report. Examination Library documents B.18.8.1 to B.18.8.3 comprise the concept mitigation information which was requested in our Regulation 19 formal response and these documents are discussed further below.

The analysis of the M2 Westbound off-slip identifies that no improvement is required as a result of the Local Plan traffic. This is accepted on the basis of the supporting information presented in document 18.5.

The assessment of the A289 Southbound Diverge (Hasted Road) indicates an increase in the requirements from type A1 to type D in the reference case for the AM, and to type B in the PM. With the addition of Local Plan traffic the requirement becomes type D in both the AM and PM peaks.

The evidence therefore indicates that the Local Plan itself will trigger a degree of improvement in one of the two peaks, but that the “primary” requirement comes from other committed development and background growth.

We therefore consider that the performance of this arm of the junction will need to be kept under review via the proposed “monitor and manage” strategy.

B18.5 Strategic Transport Assessment - M2 Junction Analysis Technical Note:

Minor formatting amendments have been made to the report. In addition, our Regulation 19 consultation response queried whether the “do something” strategic modelling included the proposed improvements at M2 J1; the submission version of the report clarifies that this improvement was not included in the run. This is acceptable as additional evidence regarding the performance of this junction with the proposed improvement in place is included in document B18.4.

Our Regulation 19 formal response identified potential issues with the M2 Eastbound off-slip, the A289 Hasted Road (Southbound) and the M2 Westbound off-slip. The updated report B18.4 examines these in more detail as discussed above and is directly referenced in this report, as was requested in our Regulation 19 response.

Our Regulation 19 response also requested additional analysis of queue length changes at M2 Junction 3 (Taddington and Lord Lees roundabouts) resulting from Local Plan traffic. This analysis is presented on pages 18 and 19 of the submitted report. We have

reviewed this information and consider that it provides appropriate clarity on the change in queue lengths, and that this does not constitute a requirement for specific mitigation to be included as part of the mitigation measures for the Medway Local Plan.

Similarly, pages 24 and 25 provide commentary on the changes in queue lengths expected at M2 Junction 4 as a result of the Local Plan proposals. We acknowledged in our Regulation 19 response that other model outputs experience only minor changes with Local Plan traffic and the queue data confirms that this also extends to expected queue lengths. We are therefore now satisfied that the information presented for this junction is comprehensive.

In conclusion, we are therefore now content with the analysis presented in the submitted version of the report and have no outstanding comments.

B18.6 Strategic Transport Assessment - Proportionality Assessment: Minor formatting amendments have been made to the report. In addition, our Regulation 19 consultation response has noted that the assessment did not specifically identify the requirement for mitigation at M2 Junction 1 or at M2 Junction 4. Both of these junctions are now referenced in the report (key information is presented in Sections 3.1 and 3.2 of the report plus in subsequent analysis tables) and it is stated that the updated proportionality assessment has informed other work including the IDP. We are therefore now content with the analysis and conclusions set out in this report and have no outstanding comments.

B18.7 Strategic Transport Assessment - Junction Modelling and Mitigation Report: Minor formatting amendments have been made to this report. Our comments at Regulation 19 related to providing clarity on the proposals at M2 Junction 1 and M2 Junction 4, in particular differentiating between the improvements associated with the Lidsing Garden Village site allocated within the adopted Maidstone Local Plan, and the “stand alone” improvements proposed to be taken forward by Medway as mitigation for their Local Plan impacts if the delivery of the Lidsing site were to be delayed. The requested clarifications have been provided, including reference to other library documents where appropriate. We are therefore now content with the analysis and conclusions set out in this report and have no outstanding comments.

B18.10 Strategic Transport Assessment - Forecasting Methodology Report: The material within this report details technical work which was principally undertaken at an earlier stage in the process (as evidenced by its issue date) and as such has not altered since its contents were reviewed and agreed to support subsequent technical exercises. We are content with the analysis and have no outstanding comments.

B18.11 Strategic Transport Assessment - Local Model Validation Report: The material within this report details technical work which was principally undertaken at an earlier stage in the process (as evidenced by its issue date) and as such has not altered since its contents were reviewed and agreed to support subsequent technical exercises. We are content with the analysis and have no outstanding comments.

B18.12 Strategic Transport Assessment - Data Collection Report: The material within this report details technical work which was principally undertaken at an earlier stage in the process (as evidenced by its issue date) and as such has not altered since its contents were reviewed and agreed to support subsequent technical exercises. We are content with the analysis and have no outstanding comments.

B18.8.1 Strategic Transport Assessment - M2 Junction 1 Design Review: This document summarises the proposed relaxations and departures from standard (as defined by DMRB) which apply to the concept design proposed for the M2 Junction 1 Eastbound merge improvements. No significant departures are identified; it is expected that this work will be expanded as the concept design is developed further. However, we consider that this information is appropriate for the purposes of appraising the scheme as concept mitigation for anticipated Local Plan impacts at this location.

B18.8.2 Strategic Transport Assessment - M2 Junction 1 Safety Review: This document has been produced to support the design review (B18.8.1) and provides more detailed analysis of potential issues with the concept design, and proposed solutions. **It is noted that National Highways has provided comments on this document directly to Medway Council in December 2025 which post-date the document within the evidence base. We would request that these comments are addressed prior to further work being undertaken at the preliminary design stage, ideally via the undertaking of a Stage 1 Road Safety Audit.**

B18.8.3 Strategic Transport Assessment - M2 Junction 1 Cost Estimate Report: This document has been produced to support the design review (B18.8.1) and Safety Review (B18.8.2) and provides initial costing information for the proposed improvements at M2 Junction 1. **It is noted that National Highways has provided comments on this document directly to Medway Council in December 2025 which post-date the document within the evidence base. We would request that these comments are addressed prior to further work being undertaken at the preliminary design stage.**

B18.9 Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report: This document provides initial costing information for the proposed “stand alone” improvements at M2 Junction 4 which would only be brought forward if the proposed major improvements associated with the Lidsing Garden Village site in Maidstone borough were to not be progressed.

We have not carried out a detailed examination of these costings to date as other supporting information (specifically the General Arrangement drawings for the scheme) has not been fixed at the time the document was originally produced. We will seek to progress this prior to the commencement of the hearings via discussion with Medway Council.

Summary

In summary, we consider that the majority of outstanding matters which we identified at Regulation 19 are now addressed via the versions of the supporting technical documents which have been submitted to the examination library.

We anticipate that there may be some further discussion of the proposed mitigation measures at M2 Junction 1 and M2 Junction 4 in the led up to the examination; particularly in terms of how the Council, in policy and practical terms (IDP etc), will manage the funding and delivery of the required mitigation. All parties are reminded that while National Highways will work with the Council and others, we will not take contributions in lieu of works nor promote works ourselves. However, we are satisfied in principle that the mitigation is acceptable from a technical perspective as demonstrated by the relevant documents within the examination evidence base.

Concluding Comments

Thank you for engaging with National Highways on the Medway Local Plan 2041 supporting evidence documents consultation.

We have provided representations on the R19 Medway Local Plan and this latest consultation. They include some aspects where we believe that further work is necessary per se and in some places may lead to required Main or Minor Modifications.

We commit to continuing to work proactively and pragmatically with the Council and others to complete the necessary work.

Once the Council has had the opportunity to consider all representations received, we would be pleased to meet with officers to review any SRN implications and agreed the way forward.

We look forward to continuing our constructive engagement with Medway Council, including the preparation of an updated Statement of Common Ground between both parties prior to the submission of the Plan.

In the meantime, if there are any immediate queries regarding our representations, please contact us via [REDACTED]

Yours sincerely,



Kevin Bown
Spatial Planner
South East Region Operations Directorate
Email: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
ME2 [REDACTED]

1st July 2026

I am writing again during the re-opened public consultation of Medway's Local Plan (Summer 2026).

I think the simple fact that the Local Plan Consultation has had to be opened again speaks volumes about the Medway Local Plan document and its proposals.

Most of the local residents agree that Medway have not done anything in the correct manner during this whole period, regarding the Local Plan and specifically for us, the whole development proposal for Policy SA6 (Land West of Strood).

After all the objections were submitted, some 6 months later in December 2025, we discover that Medway Council has submitted many significant documents that they knew full well should have been available for the public. What a very underhand way to behave.

In addition to this, all those people who submitted objections in Summer 2025 were supposed to receive an email from the Council advising them of the new public consultation period.

This has not happened!

I have not received such an email and nor have many other residents who objected.

I think all these factors in themselves demonstrate that Medway Council's Local Plan has not been carried out thoroughly or in the correct manner.

As a Linwood Avenue resident, I am writing to strongly object to the proposed conversion of Strood's Greenbelt to Greybelt and the related Medway Local Plan's housing development Policy SA6 "Land West of Strood".

I have lived in Strood all my life and quite frankly I am appalled by the proposals to build on this Greenbelt land.

The Medway Local Plan relating to the downgrading of this area of Greenbelt Land to Greybelt is not “sound” based on National Planning Policy Framework.

National Planning Policy Framework

This Greenbelt area is now the only surviving Greenbelt in this part of Strood and it is a precious part of our area that should be protected as such. The NPPF places great importance on Greenbelt Land, and it clearly states,

“Greenbelt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”.

What exactly are the exceptional circumstances relating to this proposed change from Greenbelt to Greybelt?

At no point has any “exceptional circumstance” been identified in the Medway Local Plan or explained in person by any member of Medway Council at Local Plan meetings.

Downgrading our Greenbelt to Greybelt seems to have been treated as an easy option to ‘co-operate’ with Gravesham. The impact of this would be completely removing the separation of urban sprawl between the two authorities and to simply join them, with the impact being entirely on Strood – its infrastructure, traffic, roads, GP surgeries and schools which cannot cope as it is.

This is highly concerning as there are significant other alternatives within Medway where housing developments could be built. There are sufficient brownfield areas and areas of under-utilised land that have simply been ignored by Medway Council.

According to the NPPF, the strategy should,

“make as much use as possible of suitable brownfield sites and underutilised land”

Why does the Medway Local Plan not include any of these alternatives?

There is a wealth of guidance regarding Greenbelt, and its importance in the NPPF and it has been completely ignored and disregarded by Medway’s Local Plan.

Medway’s proposal of reclassifying this Greenbelt land as Greybelt is outrageous.

It is very important agricultural land and it has been working farmland for centuries. It needs to remain so.

When I attended a Local Plan meeting recently, **I asked one of the planning officers how this assessment of the land had been made. She explained it was visited by a group from Medway Council.** This should not have been the case and needs further investigation.

Any such assessment should be carried out by independent officers.

This land change is simply an easy option for Medway Council with complete disregard for the beauty, importance of the Greenbelt land and complete disregard for the residents who live in this area.

There is a vast amount of wildlife on this Greenbelt land and there have been insufficient assessments and studies carried out by Medway Council. Local residents and local protection societies have gathered lots of evidence supporting this.

There is a considerable amount of guidance in the NPPF regarding habitats and biodiversity.

The NPPF point 193, states that,

“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), then planning permission should be refused”.

The studies carried out (in the accompanying documents to the Medway Local Plan) are poor and inadequate and there are suitable alternative brownfield sites available in Medway with nowhere near this level of biodiversity.

Strood would not be able to cope with this increase in its population

This whole area already suffers significantly with regular traffic problems and is already overstretched.

In addition to this, any accidents on major nearby roads, such as the A2, M2 and Bypass mean that all vehicles are diverted onto Rede Court Road, Brompton Farm Road and Gravesend Road. A simple five minute journey recently took me 46 minutes when the local roads were gridlocked. This happens regularly.

The proposed housing development would massively worsen this situation, meaning thousands more cars would be using these roads. Our roads cannot cope as it is.

Our local GP surgeries will simply not be able to cope with the increase in patient numbers.

I carried out some research of the local GP catchment areas and numbers of patients for each.

One of the housing development catchment surgeries, Highparks in Higham is going to be closing very soon. In another of the catchment surgeries, one GP has more than 16,000 patients. Some of our residents in and around Rede Court Road have family members within their house who have to use different GP surgeries.

How will our local GP surgeries manage thousands more patients?

Our local schools have insufficient places for potentially thousands more school-aged children. Most of our local Primary Schools have year groups already full to capacity, and there are high levels of SEND children in all of our local Primary schools. There quite simply are not enough school places for children of all these new residents.

Building houses on this area of Greenbelt land would create devastating environmental problems for existing residents.

There would be a significant issue with light pollution as the proposed area is a “dark sky area”. Areas that are dark sky areas are protected as such.

Air pollution would be a significant factor as the regular heavy traffic adversely affects air quality. This will considerably worsen if the building development goes ahead.

Where is the evidence of a full Air Quality test?

As an Authority, you have a duty to your residents and there are significant safeguarding issues that will be caused by this proposed building development going ahead for all who live in this area.

There is a huge issue with the provision of water in Medway. I live just off Rede Court Road and our water pressure is already unusually low. All the residents in this area have this same difficulty. I have lived in my property for 18 years and it has always been the case, and residents who have lived near me for much longer have said this has always been the case.

How will there be sufficient water for this number of new homes?

What will the impact for water and water pressure be?

Additional Points

The Topic Paper from December 2025 is inadequate. It does not give any satisfactory explanation of what the 'exceptional circumstances' are for changing these areas from Greenbelt to Greybelt. In addition to this, there are meetings and conversations between Gravesham and Medway and the developers that have been significant in reaching this decision to downgrade the land SA6 to Greybelt which are **not documented**. This information was requested by the Inspectorate and Medway's response has simply not provided any evidence of these such conversations.

There seems to be overwhelming evidence that this has already been 'decided' by Medway (and Gravesham), and that the development is going to be agreed and will go ahead. Many residents are certain that this will happen and several residents have spoken to developer workers who have been measuring areas in the field and the conversations certainly indicate that this is already a 'done deal'.

There was traffic counting equipment (which was recorded in writing by a Clinton Close resident) which was installed and recording traffic some months ago, and this was taking place during a period in a half-term week. Clearly this was designed so that the true term time traffic was not recorded, so it was false information.

I fear this is also the case that Medway is certain the downgrading to Greybelt will be agreed to allow development on land behind Brompton Farm Road in Strood.

In February, a local resident had some issues with her broadband service, and a BT Broadband address appeared as 'Brompton Farm, Persimmons Homes'. This would strongly suggest that the developers are already moving ahead with matters. I have evidence of this which I am attaching below.

I urge the Planning Inspectorate to carefully consider all these concerning issues and points that I have raised and I hope my strongly felt objections will be carefully considered.

Kind regards,

Natalie Hale

08:37

4G 95



Aa



13:24

45



Strood Development...



12:01

100% 4G



Broadband



TV

More



Brompton Farm, Brompton Farm
Road, Strood, Rochester, ME2 3QZ

Brompton Farm, Site Office
Persimmon Homes, Brompton Farm
Road, Rochester, ME2 3QZ



10



2



HD



Off

Send



From: [REDACTED]
To: [policy, planning](#)
Subject: Planning Objection
Date: 06 July 2026 19:45:43

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello

Im a new resident at [REDACTED] ME2 [REDACTED]. I just want to make it completely clear that I strongly object to the building proposals on Chapter Farm and thr surrounding area. The reason for me moving here is the tranquility of the setting. Not only will this have a knock on effect on the value of my new home, it will ruin the local area and the works will have a severe impact on both my health and the desire me to remain here.

Reallocating green belt as grey belt is a hypocrisy given the arbitrary net zero goals our own government have set out to achieve. To remove green belt land will have a negative impact on the long term health and wellness of locals, as well as the environement. It makes no sense and can only have been driven by alterior motive.

Further from this, it is more than just development, it is illegal levels of urban spralling. Strood and gravesham cannot be allowed to merge seamlessly, the farm represents a clear uninterrupted border between the two authorities.

Regards

Simon Crane

From: [REDACTED]
To: [policy, planning](#)
Subject: Re: Medway Local Plan e-bulletin: July 2026
Date: 06 July 2026 19:50:34

You don't often get email from [REDACTED] [Learn why this is important](#)

Totally against housing on green belt at Rede court and other areas in Strood

On Fri, 3 Jul 2026 at 17:27, Medway Council <MedwayCouncil@public.govdelivery.com> wrote:

Your Medway: Your Future: Your Say



Medway Local Plan Newsletter (July 2026)

Medway's Local Plan 2041 is now with Government for Examination.

The local plan outlines how Medway will grow over the next 15 years, including housing, businesses, transport and much more, along with the necessary supporting infrastructure.

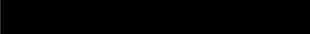
Two Planning Inspectors were appointed earlier this year, to carry out an independent examination on the plan and consider any changes that should be made.

Closing on Monday: Consultation on our supporting documents

Following feedback from the appointed Planning Inspectors who are examining Medway's Local Plan, we are now consulting on some of the supporting Local Plan documents.

We are providing residents and other stakeholders with the opportunity to comment on 35 evidence-based documents that support the draft Medway Local Plan 2041. These are documents that have been updated or published since we last invited comments on the draft Medway Local Plan in June

From: 
To: [policy_planning](#)
Subject: Objection to the Proposed Release of Green Belt Land in the Strood and Gravesham Local Plan
Date: 06 July 2026 21:41:50

You don't often get email from  [Learn why this is important](#)

Dear Sir/Madam,

I am writing to formally object to the proposed release of Green Belt land for development as part of the Strood and Gravesham Local Plan.

My family and I chose to move to this area because we wanted a calmer, quieter way of life away from the pressures of more built-up areas. The main reason we bought our home here was because of the beautiful surrounding countryside and Green Belt land. It is one of the area's greatest assets, and it has greatly improved our quality of life.

The Green Belt plays a vital role in preventing urban sprawl, protecting the countryside, and preserving the unique character of our local communities. Allowing development on this land would undermine these purposes and permanently alter the landscape that so many residents value.

The proposed development would fundamentally change the character of the area. The peaceful environment, open countryside, and natural beauty that attracted us here would be replaced by large housing developments, increased traffic, noise, and pollution. Once this Green Belt land is lost, it is gone forever.

In addition, the Green Belt provides valuable habitats for wildlife, supports biodiversity, helps reduce flood risk, and offers important open spaces for recreation and mental wellbeing. At a time when protecting the environment and tackling climate change should be a priority, it seems wrong to sacrifice these irreplaceable landscapes.

I understand that there is a need for new housing, but I strongly believe that brownfield sites and previously developed land should be fully utilised before any Green Belt land is considered for development. Protecting our countryside while regenerating unused urban land is a far more sustainable approach.

I respectfully ask that the proposed release of Green Belt land be reconsidered and that alternative solutions be explored which meet housing needs without causing irreversible damage to the local environment and the character of our communities.

Thank you for considering my comments. I ask that this objection is fully taken into account as part of the consultation process.

Yours faithfully,
J.Stocker

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: FW: Medway Local Plan 2041 supporting evidence documents consultation - Homes England Comments [06.07.26]
Date: 06 July 2026 21:51:00
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

OFFICIAL

FAO: Catherine Smith – Head of Planning Policy (Medway Council)

Homes England Comments to the Medway Local Plan 2041 supporting evidence documents consultation

Hello Catherine / Planning Policy Colleagues,

We hereby write to the above referenced Medway Local Plan consultation.

Homes England welcomes Medway Council's broad intent regarding the creation of the Hoo Peninsula Strategic Environmental Mitigation and Management Programme (SEMS) as set out in the Hoo Peninsula Strategic Environmental Programme Topic Paper and has been actively engaged in discussions with MC regarding the use of Homes England's land holdings at Lodge Hill.

However, it is noted that reference is made to the historical SEMS work that was undertaken as part of the HIF bid and **Section 4 of Appendix 2** of the Topic Paper includes a site boundary for what was previously referred to as '**SEMS Phase 2b Lodge Hill Countryside site**'. This is now out of date and includes an area of land immediately to the north of the Lodge Hill Training Area that is within Homes England's ownership. Around 27ha of this land now forms the Chattenden Fields Nightingale Compensation Land (NCL) that Homes England has identified and put forward as compensation directly associated with planning application (**ref: MC/26/0436**) for the redevelopment of the Chattenden Barracks site that is not included as a Local Plan allocation but is currently under determination by MC.

The land identified as NCL would not be made available as part of the SEMS as it relates directly to a site that MC have not taken forward as an allocated site in the Local Plan and it is not clear that draft policy SA8 has been sufficiently tested to mitigate non-allocated sites.

However, it is recognised that other land parcels under Homes England control within the CWLH SSSI and surrounding areas could play a role in the SEMS providing BNG and being part of a wider connection of sites aligned to the objectives of both the LNRS and of draft Policy SA8. Homes England will continue to engage with MC in relation to these matters and opportunities as part of ongoing SEMS discussions.

The current version of the supporting HRA and SEMS topic paper notes that the SEMS programme could include Homes England's future plans for Chattenden Woods and Lodge Hill. This does not accurately reflect the landowner position (i.e. the NCL identified land would not be available). It's therefore important that the submitted HRA and technical note is updated to reflect the above position, specifically acknowledging which land parcels could / could not form part of the SEMS programme.

We would be grateful if the above comments could be taken into account in the forward progression of the Medway Local Plan towards examination.

Many thanks

Jason.

Jason Hobbs MRTPI II MRICS

Senior Development Manager – Large Sites

Development Directorate



[@HomesEngland](#)

The Housing and Regeneration Agency

We believe that affordable, quality homes in well-designed places are key to improving people's lives. We make this happen by using our powers, expertise, land, capital, and influence to bring both investment to communities and to get more quality homes built.

Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk



Homes England is the trading name of the Homes and Communities Agency. Our address for service of legal documents is The Lumen, 2nd Floor, St James Boulevard, Newcastle Helix, Newcastle Upon Tyne, NE4 5BZ. VAT no: 941 6200 50. Unless expressly agreed in writing, Homes England accepts no liability to any persons in respect of the contents of this email or attachments.

Please forward any requests for information to: infogov@homesengland.gov.uk

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OFFICIAL

From: [REDACTED]
To: [policy, planning](#)
Subject: draft local plan - further documents consultation - Rede Court Road
Date: 06 July 2026 21:53:33

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Evening

I am writing to strongly object the planning policy for houses to be build on the Green Belt Land behind Rede Court Road.

My reasoning for this is that I am a resident of the road and paid a premium to buy a house in a nice quiet area, which stands to be ruined by hundreds of homes being built on what is a home to lots of wildlife and farming land.

The current infrastructure should have been ungraded before even looking to build more homes, the road are already congested getting worse every year.

The hospitals are full to breaking point with patients sleeping in corridors.

The schools are full with no additional places being made.

Every time there is hot weather there is a hose pipe ban due to water shortages.

All of which should currently be of higher priority to councils rather than building houses on land would should never have been considered be built on.

When there are many brownfield sites available to be built on.

Joe

06 July 2026

Project/File: Hoo Consortium/A3

Medway Council
Planning Services
Gun Wharf, Dock Road
Chatham, Kent ME4 4TR
planning.policy@medway.gov.uk

Dear Sir/Madam

MEDWAY LOCAL PLAN 2041
SUPPORTING EVIDENCE DOCUMENTS (JUNE & DECEMBER 2025; JUNE 2026)
Representations on behalf of the Hoo Consortium

I write on behalf of the “Hoo Consortium” and wish to register our **observations/comments** in respect of the present consultation in respect of previously/presently published Supporting Evidence Documents.

The Hoo Consortium presently comprises the following 4No companies:

- Church Commissioners for England
- Dean Lewis Estates
- Esquire Developments
- Redrow Homes/BDW

The Consortium has significant land interests at Hoo (circa 400+ ha) and has been working collaboratively with Medway Council over the past 9/10 years through the evolution of the emerging Local Plan and former draft Hoo Development Framework.

The Consortium’s landholdings are of sufficient scale to accommodate the majority of social, economic and physical infrastructure to support the proposed transformational change at Hoo, and help create a more sustainable and self-sufficient community that will meet housing, retail, employment and other needs on the Peninsula during the emerging Plan period and beyond. The Consortium’s interests are therefore wholly aligned with the success of the emerging **Medway Local Plan (2041)**, and the robustness of its underlying Evidence Base.

We do not comment further specifically on any of the individual documents at this stage, but given that several of these Supporting Documents are referenced in some of our earlier representations and the overlapping nature of many of these documents, we wished to reiterate that our earlier representations still stand in respect of our:

- Reg 19 Local Plan Consultation response (August 2025)
- Draft Developers’ Contributions SPD (March/July 2026)

Reference: Medway Local Plan 2041 – Supporting Evidence Documents (June 2026)

For the avoidance of doubt and also convenience, we re-attach our recent response to the **Developer Contributions SPD (July 2026)** due to the specific over-lapping nature of the following associated documents, which are also referenced in the present “Supporting Evidence Docs” consultation:

- Infrastructure Delivery Plan (Dec 2025)
- Viability Assessment (June 2025)
- Associated key emerging Local Plan policies (ie *inter alia* Policies S22, S24, SA8, SA9)

The Consortium’s last set of representations to the Reg 19 Local Plan consultation (August 2025) stressed the importance of a robust and proportionate evidence base, with clear funding and delivery mechanisms for the supporting infrastructure. We remain concerned as to how certain documents relate to each other – and whether one takes precedent over the other? We would welcome continued dialogue with the LPA in seeking to better understand these queries.

Additional Highway Related Observations

Whilst not commenting upon these documents individually, we note that the additional information provided as part of the LP Submission (Dec 2025) is predominantly related to further assessment of the Strategic Road Network (SRN) and appears to have been produced (or updated) following further discussions with National Highways (NH). The “new” documents include:

- B18.8.1 Strategic Transport Assessment - M2 Junction 1 Design Review
- B18.8.2 Strategic Transport Assessment - M2 Junction 1 Safety Review
- B18.8.3 Strategic Transport Assessment - M2 Junction 1 Cost Estimate Report
- B18.9 Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report
- B22.9 Vehicle Trip Budget Topic Paper

In commenting generally on these presently in respect of the **Strategic Road Network**, the Hoo Consortium welcomes the additional work undertaken by Medway Council to develop a mitigation strategy for M2 Junction 1 and to strengthen the supporting evidence base. The progression of a potential scheme is a positive step and provides greater clarity regarding how the impacts of future growth may be managed. It is recognised that the work is continuing and that further engagement with National Highways and other stakeholders will be required as the scheme evolves and supporting evidence is refined.

The Consortium supports the principle of a strategic solution to M2 Junction 1, provided that it is demonstrated to be deliverable, appropriately funded and proportionate to the impacts arising from planned growth. As further evidence emerges, it will be important to ensure that any mitigation requirements and associated contributions are based on a robust understanding of network impacts and are apportioned in a transparent and equitable manner. This will help provide confidence that the infrastructure necessary to support the Local Plan strategy can be delivered at the appropriate time.

In having regard to the **Proportionality Assessment** contained within these documents, the Hoo Consortium supports the Council's approach to developing a proportionate and evidence-based framework for securing contributions towards strategic transport infrastructure. The work undertaken to date provides a useful basis for considering how mitigation costs may be fairly apportioned across growth sites, and we agree that contributions should be directly related to development impacts and consistent with the relevant planning tests. In particular, the Council's exploration of alternative approaches to apportionment demonstrates a positive commitment to ensuring that the final framework is both robust, equitable and linked to viability. However, and from our initial review, we have concerns as to the

Reference: Medway Local Plan 2041 – Supporting Evidence Documents (June 2026)

reasoning behind the inclusion and exclusion of certain sites as part of this exercise, and wish to reiterate that it is our expectation that all developments impacting on these junctions should be making a proportional contribution.

As the Local Plan progresses, additional detail regarding the preferred methodology, the apportionment of costs associated with strategic interventions, and the timing of infrastructure delivery would provide greater certainty to all parties. The Consortium supports continued refinement of the evidence base to ensure that contribution requirements remain transparent, proportionate and supported by a clear audit trail linking development impacts, mitigation measures and funding requirements. This should include clear governance and monitoring arrangements, alongside consideration of how the framework will operate throughout the plan period, so that infrastructure can be delivered in a coordinated and effective manner to support sustainable growth across Medway.

As it presently stands, there is remaining work to do to better understand these important highway infrastructure considerations. Indeed, Medway Council itself recognised this and recently advised the 2No LP Inspectors [MLP/ED10¹] that:

The Council has commissioned additional work to produce an outline design, costings and traffic modelling of an interim scheme (i.e. within the highway boundary) for junctions on the A228 that require mitigation early in the plan period. This work will be available by 3 July. This will inform the drafting of statements of common ground with planning agents.

Unfortunately, this further information was not forthcoming by 03 July 2026, and we therefore respectfully reserve the right to comment further on this ahead of and during the EiP itself.

We remain committed to working with the Council in support of its development aspirations for the Hoo Peninsula, and are keen to assist with a better understanding of the viability and deliverability of the necessary supporting infrastructure to help achieve this. We would therefore welcome the opportunity of meeting with the relevant Officers and their advisors to establish how best we can assist the Council in achieving its strategic objectives. We look forward to hearing from you accordingly.

Yours sincerely

Huw Edwards

Sponden Estates (Director)

[REDACTED]
[REDACTED]

Appendices:

Savills' letter dated 22 April 2026
(inc Savills earlier Reg 19 LP representation - dated 11 August 2025)

¹ Medway Council Response to Inspectors Next Steps [MLP/ED9]

03 May 2026

Project/File: Hoo Consortium

Medway Council
Planning Services
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
planning.policy@medway.gov.uk

Dear Sir/Madam

MEDWAY DEVELOPER CONTRIBUTIONS AND OBLIGATIONS GUIDE (MARCH 2026)
Representations on behalf of the Hoo Consortium

I write on behalf of the "Hoo Consortium" and wish to register our **observations/comments** in respect of this present SPD consultation.

The Hoo Consortium presently comprises the following 4No companies:

- Church Commissioners for England
- Dean Lewis Estates
- Esquire Developments
- Redrow Homes/BDW

The Consortium has significant land interests at Hoo (circa 400+ ha) and has been working collaboratively with Medway Council over the past 9/10 years through the evolution of the emerging Local Plan and former draft Hoo Development Framework.

The Consortium's landholdings are of sufficient scale to accommodate the majority of social, economic and physical infrastructure to support the proposed transformational change at Hoo, and help create a more sustainable and self-sufficient community that will meet housing, retail, employment and other needs on the Peninsula during the emerging Plan period and beyond. The Consortium's interests are therefore wholly aligned with the success of the emerging **Medway Local Plan (2041)**, and the robustness of its underlying Evidence Base.

We mention this from the outset, as it is the **S106 SPD** that is the subject of its own (separate) consultation presently, and yet the SPD needs to read holistically alongside the following associated documents:

- Infrastructure Delivery Plan (Dec 2025)
- Viability Assessment (June 2025)
- Associated key emerging Local Plan policies (ie *inter alia* Policies S22, S24, SA8, SA9)

Reference: Medway S106 SPD Consultation, Hoo Consortium

The Consortium's last set of representations to the Reg 19 Local Plan consultation (August 2025) stressed the importance of a robust and proportionate evidence base, with clear funding and delivery mechanisms for the supporting infrastructure. Those representations included our preliminary commentary on the IDP and Viability Assessment, and the need for a clear inter-relationship between the 2No documents. Our representations were also accompanied by some benchmark analysis from our Cost Consultants in respect of the key highway mitigation schemes and proposed education facilities being proposed/sought associated with the growth on the Hoo Peninsula.

Having reviewed the draft **Developer Contributions SPD (March 2026)** and the latest **Infrastructure Delivery Plan (Dec 2025)**, we are concerned as to how they relate to each other – and whether one takes precedent over the other? Such concerns are compounded when both of these key documents are wholly inter-related to the wider **Viability Assessment (June 2025)** that has not been updated since the Reg 19 LP consultation.

We appreciate that the reasoning behind the Council's publication of the SPD at this time is to help inform those planning applications that are presently with the LPA, and others anticipated to be determined ahead of the Local Plan Examination, but is nevertheless essential that each of these documents talk to each other in order to be "effective" and "justified" in planning terms.

To this end, I append to this letter an updated letter (dated 22 April 2026) from the Hoo Consortium's Development Advisor (**Savills**), which appends a copy of their earlier Reg 19 response¹ (dated 11 August 2025). This sets out our present observations, and why our earlier concerns remain relevant in respect of the present SPD consultation.

In making these comments, we also note the recent observations of the appointed Local Plans Inspectors in their "Initial Queries" (dated 27 March 2026) [**MLP/ED5**], in particular para 18:

To assist our overall understanding of strategic site delivery, please could the Council demonstrate deliverability within the Plan period for each strategic site with regard to its master planning status; land control; anticipated application dates; specific infrastructure required; infrastructure funding route; anticipated start and completion dates and any other critical path item. This information should be set out clearly in an explanatory note.

We recognise that the Council will be preparing its response to PINS shortly², but we consider the Inspectors' observations above reiterates the importance of a conjoined funding and delivery strategy for relevant infrastructure – especially on the Hoo Peninsula.

Much of the infrastructure funding being sought by the S106 SPD is for services/facilities that will mostly be located (and delivered) on land controlled by the Hoo Consortium. We therefore remain committed to working with the Council in support of its development aspirations for the Hoo Peninsula, and are keen to assist with a better understanding of the viability and deliverability of the necessary supporting infrastructure to help achieve this.

¹ This includes reference to the fuller representations (and other Appendices, inc costings) made by the Hoo Consortium (11 Aug 2025). Medway Council already has a copy of these, but please contact us if you require us to resend these.

² An extended deadline of 29 April 2026 was provided by PINS to Medway Council, but no such response had been uploaded or publicly available at the time of finalising these representations (03 May 2026)

Reference: Medway S106 SPD Consultation, Hoo Consortium

We would therefore welcome the opportunity of meeting with the relevant Officers and their advisors to establish how best we can assist the Council in achieving its strategic objectives.

We look forward to hearing from you accordingly.

Yours sincerely

Huw Edwards

**Sponden Estates
Director**

[Redacted]
[Redacted]

Appendices:

Savills' letter dated 22 April 2026
(inc Savills earlier Reg 19 LP representation - dated 11 August 2025)

22 April 2026



Christian Colbeck MRICS

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

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 with regard to the Infrastructure Development Plan (IDP) and Developers Contribution Guide which have been issued as part of the Regulation 19 process. We previously wrote to you in this regard on the 11th August 2025 and attach this response, which we consider to remain relevant, as a reminder at Appendix 1.

Having reviewed both the IDP and Developer Contribution Guide we are unaware how the documents relate to one another and how they will be used to guide and set S106 obligations for sites going forward. For example does one document take precedent over the other or will both documents be used in tandem?

We note costs are identified in the Developer Contribution Guide which are not detailed in the IDP, and vice versa. Please can you clarify how these documents are intended to work together and how the total package of S106 obligations will be calculated against these documents for individual allocations.

Yours sincerely



Christian Colbeck MRICS
Director
Strategic Development



Appendix 1

11 August 2025



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

Christian Colbeck MRICS

DRAFT

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 uncoded 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

A black rectangular box redacting the signature of Christian Colbeck.

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.

From: [REDACTED]
To: [policy_planning](#)
Subject: Medway Local Plan - Additional document consultations
Date: 06 July 2026 22:11:17

the Allhallows Parish Council wish to see a Medway Local Plan adopted as soon as practical to prevent predatory approaches from developers on sites that have been assessed as unsuitable.

However there has been a lack of consultation with local parish councils which has led to a local plan that fails to reflect local issues in the Parish Council areas adequately.

Transport issues have failed to fully identify the current problems and the future increase of these. We welcome the identification of a transport hub on the north side of Hoo and would wish to see this developed for the benefit of the northern villages, but current details are sketchy. We are disappointed to see the very limited development of a rail option to reduce the road traffic demands now and in the future. It appears to be limited to protecting the rail alignment for future passing loops and do not help provide the funding for a station and rail service, falling short of ensuring that funding can be raised from the significant developments on the Hoo Peninsula where large profits are likely due to the increase in land values, but community infrastructure to benefit the area is limited.

There are concerns regarding the ability to provide adequate water and electricity and medical facilities are stretched. Although there is a Doctor's Surgery, there is no doctor allocated to it.

There is ongoing development of the Haven Kent Coast site, with the owners forecasting a population of around 10,000 people in the peak summer season with traffic problems generated.

The Parish Council remain willing to discuss the problems of the area and help to identify solutions. Current developments have promised significant s106 funds to help develop facilities for the village residents, but have failed to deliver. Inflation since the Covid-19 outbreak has outstripped RPI inflation has seriously impacted schemes to develop the Brimp Youth Centre and Cross Park (where planning permission has been granted). Infrastructure delivery has been focussed on strategic development areas at the cost to other areas on the peninsula that will still be affected,

--

Chris Fribbins (Clerk) Allhallows Parish Council

[REDACTED] ME3 [REDACTED]

Email: [REDACTED]
Phone: [REDACTED]
Web: www.allhallowskent-pc.gov.uk

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From: [REDACTED]
To: [policy_planning](#)
Subject: Planning objection / Rede Court Road
Date: 06 July 2026 22:27:44

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Sir/Madam,

I am writing to formally object to the proposed housing development behind Rede Court Road.

I strongly believe this development is unsustainable because the local infrastructure is already operating beyond its capacity. Before any further housing is approved, existing residents deserve assurance that essential services can cope with the additional demand.

The closure of Higham Surgery has already left many residents without adequate access to local GP services, forcing people to register with practices in neighbouring towns. This simply transfers the pressure elsewhere rather than solving the problem. Local hospitals and NHS services are already under considerable strain, and adding further housing without corresponding investment in healthcare infrastructure will only make the situation worse.

The road network is another major concern. Additional housing will inevitably increase traffic congestion, air pollution and road safety risks. Residents will experience higher levels of vehicle emissions and noise, significantly affecting the health and wellbeing of those already living in the area.

I am equally concerned by the permanent loss of valuable green space. Once this land is developed, it cannot be replaced. Open countryside provides an important habitat for wildlife, improves air quality, helps manage flood risk and offers an attractive environment for local residents. The gradual loss of these spaces is changing the character of our community and reducing the quality of life for those who already live here.

The construction phase itself will cause prolonged disruption through noise, dust, heavy construction traffic and general disturbance. Residents living adjacent to the site will lose the peaceful enjoyment of their homes and gardens for what could be several years.

I also question the necessity of building on greenfield land when there are over 20,000 unoccupied homes across Kent. Greater priority should be given to bringing existing empty properties back into use before sacrificing more countryside. This would make far better use of existing housing stock while avoiding unnecessary pressure on local infrastructure.

I respectfully ask the Council to consider whether this proposal complies with the principles of sustainable development set out in the National Planning Policy Framework. Development should only proceed where there is sufficient infrastructure to support it and

where it does not result in unacceptable harm to the environment or to the amenity of existing residents.

I would also ask the Council to explain:

- How local GP and hospital capacity will meet the increased demand created by this development.
- What improvements are planned for the local road network to accommodate additional traffic.
- How the loss of green space and wildlife habitat will be mitigated.
- Why greenfield land is being developed when a significant number of homes across Kent remain unoccupied.

As a resident, I feel this proposal places excessive pressure on already overstretched public services while permanently damaging the local environment and the character of our community. I therefore respectfully request that planning permission is refused.

Kind Regards