

## Medway Developer Contributions and Obligations Guide

All email responses received are presented in the following order:

- File A: All email Responses

There were 52 Responses total across channels Email and OPUS. This index is only the Email responses. If you wish to see the OPUS responses please navigate to the OPUS page and select the magnifying glass icons.

### Responses

<b>ID</b>	<b>NAME</b>	<b>CHANNEL</b>
<b>E.1</b>	Designing Out Crime Team	Email
<b>E.2</b>	National Highways	Email
<b>E.3</b>	Sport England	Email
<b>E.4</b>	Kent Wildlife Trust	Email
<b>E.5</b>	Peter Court Associates	Email
<b>E.6</b>	Natural England	Email
<b>E.7</b>	Hoo Consortium	Email
<b>E.8</b>	Peel Waters	Email
<b>E.9</b>	Kent SME Network	Email
<b>E.10</b>	Esquire Developments	Email
<b>E.11</b>	Taylor Wimpey	Email
<b>E.12</b>	Department for Education	Email
<b>E.13</b>	Home Builders Federation	Email
<b>E.14</b>	Brookworth Homes	Email
<b>E.15</b>	Homes England	Email
<b>E.16</b>	Catesby Strategic Land Limited	Email



**Kent  
Police**

Protecting and serving the people of Kent

[REDACTED]  
[REDACTED]  
Date: 24<sup>th</sup> March 2026

Dear whom it may concern,

Thank you for opportunity to comment on the Medway Developer Contribution Guide.

These comments relate to Designing Out Crime via Crime Prevention Through Environmental Design (CPTED), the National Planning Policy Framework (NPPF) and Section 17 of the Crime and Disorder Act 1998.

CPTED:

Access and Movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;

Structure: Places that are structured so that different uses do not cause conflict;

Surveillance: Places where all publicly accessible spaces are overlooked;

Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community;

Physical Security: Places that include necessary, well-designed security features;

Activity: Places where the level of human activity is appropriate to the location and creates a sense of security at all times;

Management and Maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

NPPF:

Dated December 2024

[https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

We draw your attention to the following paragraphs:

117 c); 96 b); 20 b); 102 a) and 102 b)

Section 17 of the Crime and Disorder Act 1998:

Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a)crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b)the misuse of drugs, alcohol and other substances in its area and (c)re-offending in its area.

We also strongly recommend that the latest advice from the Secured by Design (SBD) Design Guides are included: [www.securedbydesign.com](http://www.securedbydesign.com) is incorporated when considering development applications. SBD is the UK Police flagship initiative addressing designing out crime and security. In addition to design and layout advice, they list independently certificated companies and products that meet recognised security standards and have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies of 87% reduction in burglaries in new homes. There is a carbon cost for crime and incorporating SBD provides opportunity for it to be addressed.

Recommendations from points in the draft report include:

New development plans should provide an explanation of how they can help address and encompass NPPF, Section 17, CPTED, and Secured by Design to avoid creating an opportunity for Crime, Fear of Crime, ASB, Nuisance and Conflict:

- Designs should protect the Local Green, amenity, leisure and recreation spaces.
- Designs should protect local footpaths, any bridleways, cycleways or formal desire lines.
- Sport and leisure access routes to be safe, with management and maintenance to help avoid them becoming "narrow, unsafe, urbanised routes".
- New housing should incorporate advice from SBD Residential (Homes) Guide 2025.
- New commercial developments should incorporate advice from SBD Non-Residential (Commercial) Guide 2025.
- Development layouts should maximise opportunity for natural surveillance e.g. windows in side elevations.
- Perimeter treatments can include densely planted hedging, walls and fencing.
- Corner Properties and any ground floor bedroom windows will require defensive treatments.
- **Parking spaces require "active" windows so that the owners can see them** unless in a secured area.
- Lighting to be designed by a qualified professional lighting engineer to provide security without creating conflict or light pollution.
- Physical security to meet SBD certified standards.

Yours's sincerely,



Designing Out Crime Officer

Strategic Prevention Command

**From:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** NH Response NH/26/15542 An update on the Medway Developer Contribution Guide  
**Date:** 31 March 2026 10:05:40

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

### **FAO: Planning Policy**

Thank you for your mail dated 23 March 2026 regarding the update on Medway Developer Contribution Guide which indicated that it will be closed on 05 May 2026. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the A2 (west) and M2.

#### ***We would like to note the following:***

The Council's intentions is to secure developer contributions through planning obligations (including S106 Agreements), which can be used to ensure the provision of facilities or mitigation of impacts. Please note HA cannot be party to an S106 Agreement, and therefore any shortfalls in a scheme design must be secured through planning conditions if relevant to the SRN and funded via an agreement under S278 of the Highways Act.

Such an agreement needs to be with a single party which suggests that a single party will be needed, where for example several developments will impact on the same junction

Section 19.1.2 states: ***'National planning policy requires all developments that generate significant amounts of movement to provide a Travel Plan, with applications supported by a Transport Assessment or a Transport Statement.'***

These documents should follow the 'Vision and Validate' approach that sets an aspirational, sustainable, and people-first vision for an area. It should focus on achieving desired outcomes like reduced car dependency and net-zero emissions, then validates that these targets are met through monitoring and proactive management.

***Section 19.1.3 states 'National Highways will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network, in the case of Medway, the A2 west and M2.'***

NH will also be concerned with any mitigation on local road network that can potentially have an impact on SRN.

### **Section 19.2 refers to Policy Context**

Apart from the policy National Highways also relies on the policies, standards and advice set out in

1. WebTAG with regards modelling to:
  - a. set objectives and identify problems
  - b. develop potential solutions
  - c. Create a transport model for the appraisal of the alternative solutions
  - d. And how to conduct an appraisal that meets the requirements of the Department for Transport (DfT)
2. Design Manual for Roads and Bridges regarding road schemes
  - a. The Design Manual for Roads and Bridges (DMRB) are requirements and advice documents relating to the design, assessment and operation of motorway and all-purpose trunk roads in the UK.

### **Section 19.3 refers to Requirement**

It is worth clarifying that Highways England will require that any development mitigation for the SRN is secured via Section 278 agreements, as referred to in paragraph 116. of Planning for the future – A guide to working with Highways England on planning matters (Sept 2015).

DfT circular para 29 states ***'New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.'***

### **Section 19.4 refers to Sustainable Travel: Accessible and Connected Communities**

For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV charge points should be installed where developments include on-street or communal parking to support the government's commitment to decarbonise transport by 2050.

### **Sections 19.5 and 19.6 refer to Highway Safety and Capacity**

It is already accepted that the Strategic Road Network has little, if any, spare capacity in the vicinity of Medway. Therefore, any future development will need to maximise sustainable, deliverable, robust, fully funded alternatives to road use,

while mitigating any remaining impacts.

The potential cumulative effects of the proposed development and other committed development could be so severe as to be unacceptable. The focus is to strive for 'nil detriment' but have measures to avoid any unacceptable or severe impacts.

Developments that could impact upon the SRN should include Highways England at the scoping stage to agree the scope of study areas. This would proactively help to ensure that issues that may take time to analyse and resolve are identified as soon as possible.

Should you or any others have any queries regarding our response, please contact us via [REDACTED]

Kind regards

[REDACTED]  
South East Region, Operations Directorate  
National Highways

**Web:** [www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

For information about our engagement with the planning system please visit <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

*Registered in England and Wales no 9346363 | Registered Office: Three Snowhill, Snowhill Queensway, Birmingham, B4 6GA*

Consider the environment. Please don't print this e-mail unless you really need to.



Subject:  
Date:



Medway Developer Contribution Guide - Sport England ref: SP/26/00006873  
24 April 2026 15:05:34

---

Good afternoon,

Thank you for inviting Sport England to comment on this document.

Our comments are limited to sections 15 and 18

### **Section 15**

Table 10 Sport England and the National Planning Policy Framework do not support National standards – Paragraph 103. So, we believe it is inappropriate to put forward standards on outdoor sports, especially pitches. You are the process of updating your playing pitch strategy and built facility strategy at this time. To reference the old strategies is not going to be helpful to you and given you're quoting planning policy guidance note 17 from way back in 2012, which on the 27th of March in 2012 PPG 17 was out of date and was replaced by the relevant paragraph on the NPPF.

Also, the local facilities football plan is not based on any recognised methodology what is more an action plan football foundation. And therefore, cannot really be considered as another material consideration. Therefore, we would strongly advise this to be removed from your background evidence along with all the dated strategy references.

Your charge of £3506.75 for dwelling is more akin to a silk charge than a section 106 charge. This charge really needs to be robustly evidenced.

### **Section 18**

We have similar concerns about this section in that you are referring to a well out of date sports facility strategy and you are currently in the process of creating a new one. The planning facilities model on its own is not sufficient to be used as an evidence base it needs to be done in conjunction either with a full built facilities strategy or alternatively as a short-term measure using our sports facility calculator which incidentally we would support until the new built facilities strategy is completed.

Again, we have concerns that you have got a charge for dwelling which again is akin to CIL, rather than a Section 106 figure.

### **Sport England's position**

Sporting is very supportive of what Medway Council is trying to achieve through developer contribution guide but we believe that referencing outdated and report evidence is not helpful to your case.

Sport England is currently working with Medway council to provide a robust built facility strategy and robust playing pitch strategy. Once this work is completed, Medway council will have a much more secure evidence base on which to ask for contributions and if Medway did want to have some form of almost like community infrastructure they not could be what type throwing the playing pitch calculator the build facility calculator add potentially other means that would stand up to


developer scrutiny.


In the meantime, should you wish to discuss this please do not hesitate to contact me .

Finally, your colleagues Fiona and John, who I have copied into this email, are leading on the development of these new strategies and you may wish to speak to them

best wishes

Bob

 RIBA ARB MRTPI Principal Planning Manager - South Team Planning & Active Environments

  
We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)

Date: 28<sup>th</sup> April 2026  
Medway Council  
By email only: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)



**Kent**  
Wildlife Trust

Dear Madam/Sir,

**RE: Consultation on the Medway Developer Contributions and Obligations Guide**

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Medway Developer Contributions and Obligations Guide. We have reviewed the document online and have provided comments and recommendations below. Responses have only been provided to the set questions which fall within KWTs remit. To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format.

Chapter 16 – Environmental Mitigation

*16.2 Where it Applies?*

It is recommended that the wording of paragraph 16.2.1 is amended to include reference to the mitigation hierarchy. This will underline the need for developments to be designed in a way that has in the first instance avoided, and then mitigated, impacts to protected and priority species, designated and non-designated sites and priority ecological habitats. It is also recommended that reference is made to the mitigation of surface water pollution alongside the impacts of noise and light pollution and increased recreational disturbance.

*16.3 Requirement*

It is recommended that the wording of paragraph 16.3.5 makes explicit reference to the need for the mitigation hierarchy to be followed in the first instance before arriving at a requirement to provide a financial contribution to minimise impacts on adjacent sites of nature conservation interest. Consultation with the owners and/or managers of the relevant site of nature conservation interest must be carried out as early as possible in the application process to clearly establish whether a financial contribution will be a sufficient mitigation or compensation measure. It should be noted that in some instances, a financial contribution will not address the harm that would be caused to interest features of a site of nature conservation interest. It is also recommended that the paragraph makes clear that where this occurs planning permission may be refused.

*16.4 Charging System*



It is recommended that parts a. and b. of paragraph 16.4.1 are amended to require an endowment charge equal to 30 times the annual cost of management works (plus indexation). This time frame is in line with the required 30-year enhancement and management period for the delivery of Biodiversity Net Gain under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

*16.5 Formulae*

It is recommended that under paragraph 16.5.1 reference is made for the need to agree a bespoke and site-specific compensation strategy with the Local Planning Authority to address direct or indirect impacts to an irreplaceable habitat. These measures would fall outside the normally required 2 for 1 replacement ratio suggested within this guide.

We hope that the comments made within this letter prove useful in the formation of the Medway Developer Contributions and Obligations Guide.

Yours sincerely,

  
Planning and Policy Officer  
Kent Wildlife Trust  


From: [REDACTED]  
To: [policy\\_planning](#)  
Subject: Medway Developer Contributions SPD  
Date: 30 April 2026 10:21:14

---

Dear Sirs,

I welcome this opportunity to make representations on your Developer Contributions SPD. I have acted for -and still have -clients in your local authority, as well as throughout the rest of Kent and am therefore well aware of the legislative basis for seeking such contributions. However, these must be both justified and reasonable. As a Planning Consultant, my role is to explain to my clients the basis for the array of payments sought by local authorities. As you can appreciate, this is not always (ever?) easy, especially when I tell them that much of what is being sought is soundly based. However, that is all part of my job.

Having read your SPD I firmly believe that I need to make certain representations, based on my extensive experience and knowledge of the system.

The first point is that , whilst it is acknowledged that the costs of council services has increased ( as have costs and taxes for developers) they cannot simply be passed on to landowners and developers, especially when those are themselves struggling. I have been informed in the past by council officers that developers should not worry about such costs as they can simply be added to the price they charge for their houses ! Unbelievably, this was said by a Deputy Borough Planning Officer in the days when there were KPOG/HBF liaison meetings. This statement horrified the developers present as it proved beyond all doubt that council officers simply did not understand the way in which the housebuilding industry operated. The fact that house buyers had choices and builders were faced with competition from other builders as well as the enormous second- hand market and were therefore at the mercy of market forces was ( and, unfortunately, often still is, ) irrelevant to planning officers and councillors. If developers knew precisely what they would be able to sell each house for -and when that would be-then things would be different and life would be so much easier for them and for local authorities. Unfortunately, the world of residential and related development is not like that.

In assessing your SPD I have considered whether the range of services for which you are requiring payments are appropriate and whether the levels of fees are realistic. Starting with the range of services it appears that the Council has approached this matter by listing every possible service for which it thinks could possibly be impacted by the development and therefore can argue that a payment should be made. Having looked at your schedule I believe that some of those for which you seek payments lie beyond the scope of the legislation. Indeed, is it really appropriate to claim that cultural and community infrastructure; heritage and tourism infrastructure; public realm and town centre enhancements; libraries; skills; social care and health are services for which developers need to make provision ? The justification for these is slim to non-existent. In reality, the funding of these comes out of national taxation

and from the council tax. These should therefore be removed from the SPD.

I have also compared some of your charges per dwelling to those by Kent County Council as shown below :

Youth centres and facilities: Medway £107.64: KCC £74.05.

Education (Primary expansion): Medway : £6239.16 : KCC £5412.74.

Education (Primary new build ): Medway : £7449.30 : KCC £3098.29

Education ( Secondary expansion): Medway: £6038.77: KCC £5329.27

Education (Secondary new build): Medway: £6350.56: KCC £4030.29

Social care: Medway: £287.12: KCC £180.84.

As for libraries ( and notwithstanding my comments above) KCC simply charges £62.03 per dwelling for books as opposed to requiring fees for expansion or new build.

There is also the crucial need for all local authorities to consider viability, although this is often dismissed. In reality, and especially for brownfield sites, the costs of development are exceptional and the viability/forecast level of profitability are marginal. The fact of the matter is that developments will not proceed if forecast costs are too high and/or forecast profits are too low. I appreciate that profitability is a rude word in many quarters. However, house building is not a social service or a nationalised industry and developers require certain levels of forecast profit in order for it to take place. If those forecasts are not acceptable, then developments will not proceed. Indeed, I am involved in one project elsewhere in Kent where, due to the costs of development, a permission on an allocated site for over 50 dwellings will not now proceed.

I acknowledge that this is not the response you wished to receive, although I am sure that you expected objections from the development industry. However, as a consultant with extensive experience, I am very much aware of what is and is not reasonable in this respect. In these circumstances, I would ask that you re-consider your requirements in your SPD. Should you require further information, or wish to discuss any aspect of your proposals with me, then please let me know. As a consultant, I want the system to be fair, reasonable and acceptable. It is therefore a matter for you to also adopt the same approach.

Yours faithfully,

Peter Court.

Director.

Peter Court Associates  
Cleaveland  
Chart Road  
Chart Sutton  
Kent  
ME17 3RB

**CONFIDENTIALITY NOTICE**

This is an e mail from Peter Court Associates. Its contents are confidential to the addressee and may be legally privileged. Its contents may not be disclosed to or used by anyone other than the addressee nor may it be copied in any way. If received in error, please contact Peter Court Associates on 01622 844330 quoting the name of the

sender and addressee, then delete it from your system.

Please note that neither Peter Court Associates nor the sender accepts any responsibility and it is your responsibility to scan attachments (if any).

From: [REDACTED]  
To: [Policy Planning](#)  
Subject: RE: Medway Council Developer Contribution Guide  
Date: 30 April 2026 17:12:59

Our ref: 544341

Dear Medway Council

Thank you for your email consulting Natural England on the draft Developer Contribution Guide. Natural England welcomes the inclusion of the contributions for managing recreational disturbance to coastal designated sites, environmental mitigation and green infrastructure.

The requirements of Policy S48 of the submitted Local Plan (in terms of the scale of green infrastructure delivery and the strategic environmental management plan) do not appear to be included within the document and we would recommend that greater clarity is provided on how these measures will be secured and funded, should the Local Plan be adopted.

I hope these comments are helpful.

Kind regards

[REDACTED]  
[REDACTED]  
[REDACTED]

Subject: 544341 Medway Council Developer Contribution Guide

Local Plan header

7

MDCG

7

### Medway Developer Contribution Guide: Consultation launches today

We are consulting on an update to our **Medway Developer Contributions and Obligations Guide**.

The Guide is a Supplementary Planning Document and is used in making decisions on planning applications. The draft Guide includes updates on services and costs.

It's used to identify the services and infrastructure that developers will be expected to strengthen and improve to take account of the impacts of additional demands arising from growth.

**The consultation starts on Monday, 23 March, and closes at 11:59pm on Tuesday, 5 May 2026.**

You can view the consultation document and make comments [online](#).

[Visit our Planning Consultations online hub for more details.](#)

Copies of the consultation draft Developer Contributions and Obligations Guide are also available to view during normal opening hours at:

- The Council's offices at Gun Wharf
- Council libraries in Strood, Rochester, Chatham, Gillingham, Rainham and Hoo St Werburgh

Details of the opening hours and locations are available on our website.

If you would like any further information about this consultation, please contact the Planning Policy team on:

[REDACTED]

[Visit our Planning Policy team](#)

Vision for Medway

7

The purpose of this guide is to inform and assist developers, our own staff and all stakeholders (which includes members of the public) to:

- Ensure the impacts of developments are properly mitigated
- Ensure that there is clear information on Medway Council's policy for developer contributions
- Ensure consistency, transparency and accountability
- Provide a streamlined, efficient service
- Achieve greater speed in determining planning applications.

[View part of the consultation here](#)

Rochester Riverside

7

MC footer

7



**Edit your preferences or unsubscribe**

This email was sent to [consultations@naturalengland.gov.uk](mailto:consultations@naturalengland.gov.uk) using GovDelivery Communications Cloud on behalf of: Medway Council

This message has been sent using TLS 1.2 This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

From:



Subject: Medway Developer Contributions and Obligations Guide SPD Consultation

Date: 03 May 2026 11:15:36

Attachments: [Medway S106 SPD Hoo Consortium Final.pdf](#)  
[Savills combined Medway response April 2026.pdf](#)

---

Good morning.

I refer to the above SPD consultation, which closes on 05 May 2026.

Please find enclosed the formal response on behalf of the Hoo Consortium.

This comprises 2No parts:

- Sponden Estates' letter (dated 03 May 2026)
- Savills' letter (dated 22 April 2026) plus Appendix (Savills' letter dated 11 August 2025)

The Hoo Consortium presently comprises the following 4No companies:

- Church Commissioners for England
- Dean Lewis Estates
- Esquire Developments
- Redrow Homes/BDW

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.

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.



**Director**

-----

**Sponden Estates**

## Land & Planning

-----



03 May 2026

Project/File: Hoo Consortium

**Medway Council**  
**Planning Services**  
**Gun Wharf**  
**Dock Road**  
**Chatham**  
**Kent ME4 4TR**  
[planning.policy@medway.gov.uk](mailto: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)

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 response<sup>1</sup> (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 shortly<sup>2</sup>, 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.

---

<sup>1</sup> 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.

<sup>2</sup> 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

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted address line 1]

[Redacted address line 2]

**Appendices:**

Savills' letter dated 22 April 2026  
(inc Savills earlier Reg 19 LP representation - dated 11 August 2025)

22 April 2026



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

[REDACTED]  
[REDACTED]  
33 Margaret Street W1G 0JD  
savills.com

Dear Sir / Madam,

**Medway Local Plan, Regulation 19 Consultation**

We act for and on the behalf of the Hoo Consortium in relation to viability and write you 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 11<sup>th</sup> 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

[REDACTED]

[REDACTED]  
Director  
Strategic Development





**Appendix 1**

11 August 2025



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

**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 uncosted items to be less essential and not to comprise key infrastructure with many likely being delivered on site by developers, and can consequently be removed from the IDP.



### **Phasing of IDP Costs**

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

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

From previous conversations with the Council, we understand the 6FE Secondary School for Hoo is required early in the Plan period, prior to the occupation of a sufficient number of homes which could solely fund the £40-£45m cost estimate. For items such as these, which are required early in the Plan period, the Council is advised to explore alternative upfront sources of funding to facilitate the early delivery of infrastructure, with the cost recouped by subsequent S106 payments.

### **Local Plan Viability Assessment**

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

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

#### **Housing Numbers**

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

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

#### **Infrastructure Costs**

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

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



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

Developer Profit

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

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

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

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

Yours sincerely

[Redacted signature]

[Redacted name]

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	NA
Wastewater treatment infrastructure	Utilities & Waste	Medway wide	NA
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 £/m<sup>2</sup>, Functional unit and Group element prices studies all show costs with Preliminaries apportioned by cost. The Element cost per m<sup>2</sup> 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 m<sup>2</sup> studies will be different.

Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR

Our Ref: 096-003

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

5 May 2026

Dear Sirs,

## Peel Waters

### Representation to Medway Developer Contributions Guide SPD (Consultation Draft February 2026)

We write on behalf of our client Peel Waters in response to the consultation on the draft Medway Developer Contributions Guide Supplementary Planning Document (SPD) (February 2026).

Peel Waters has significant brownfield land interests in Medway around Chatham Docks Industrial Estate, identified in the draft Local Plan as Site SM16 and comprising:

- Chatham Waters – a mixed use development on part of the former Chatham Docks Industrial Estate to the east of Basin 3 which was granted planning permission in 2013 for a large mixed use development including 950 homes.
- Basin3 – an employment campus within the Industrial Estate immediately south of the Basin with outline permission granted in 2025 for up to 31,000m<sup>2</sup> of employment space.
- The balance of the Industrial Estate primarily to the north of the Basin, comprising circa 23Ha of land adjacent to the residential development on St Mary's Island.
- The disused naval railway line which is proposed to be repurposed as a Greenway linking Chatham Waters to Gillingham Town Centre.

Since planning permission for Chatham Waters was approved in 2013, over £200m has been invested to date including on flood defences and road infrastructure. The existing signalised junction at Pier Road was designed to accommodate the future access needs of the wider regeneration proposed across SM16. About 600 new homes have been delivered so far, including a mix of affordable and later living, alongside retail, commercial and the University Technical College.

This track record of delivery to date has given Peel Waters a good understanding of potential costs, viability, and the potential for further regeneration of the wider land holdings for a mixed use development including circa 3,000 additional homes, as set out in our previous representations to the emerging Local Plan. Peel Waters' land (SM16) also forms part of the wider River Waterfront, subject to draft policy SA4.

These are substantive plans to transform a former industrial estate into a thriving new residential and business location, integrated with the existing universities and communities of St Mary's Island and Chatham Waters. The development will deliver significant new public realm and access to the river front and Basin 3. It will introduce climate resilient development and green travel opportunities that will help knit together the wider waterfront area with Gillingham and the surrounding communities.

The nature and scale of regeneration that is proposed on a previously developed dockland site will be challenging in terms of overall viability. The land will need remediation, flood defenses will need to be enhanced and there will be various other abnormal costs related to the delivery of development in this location.

### Update

Since the Reg 19 consultation last Summer, Peel Waters has further considered how site SM16 may be delivered in terms of a high-level review of viability based on an updated masterplan, which has evolved for the wider waterfront area.

Approval for the Basin3 employment scheme was confirmed after judicial review and vacant buildings on the industrial site will be demolished in due course to prepare the land for future development.

We have reached out to the Council to establish if there is any opportunity to engage further on potential areas of common ground ahead of the Local Plan Examination and would be grateful for a response.

### Draft Developer Contributions Guide SPD

National Planning Practice Guide (NPPG) sets out that when drafting policies for developer contributions *'plan makers should consider how needs and viability may differ between site typologies and may choose to set different policy requirements for different sites or types of development in their plans.'*

Each planning obligation sought is required to meet the statutory tests (regulation 122 of the Community Infrastructure Levy Regulations 2010) and viability assessment should be used to ensure that policies are realistic and that *'the total cumulative cost of all relevant policies will not undermine deliverability of the plan'* (ID 23b-005-20190315).

NPPG confirms that obligations are negotiable (ID 23b-010-20190315) but *'where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.'*

Furthermore, *'where planning obligations are negotiated on the grounds of viability it is up to the applicant to demonstrate whether particular circumstances justify the need for viability assessment at the application stage.'*

Site SM16 provides a significant opportunity for sustainable regeneration and its delivery is required to help ensure the Medway Local Plan delivers the new homes and employment opportunities over the Plan period to meet the objectively assessed need.

For these reasons, it is important for Peel Waters to identify through a representation to the Draft SPD, that:

- The scale and mix of uses proposed at SM16 will inevitably require *a bespoke approach* to agreeing developer contributions. This should be set out clearly in the draft SPD (it is currently inferred, for example at paragraph 4.1.6 and, in respect of affordable housing, at paragraph 5.3.4).
- At this [Local Plan] stage, Peel Waters has begun to consider overall viability and delivery of SM16, which has various abnormal costs associated with the nature of a large brownfield waterfront site.
- Peel Waters fully expects (and the draft SPD should accept and clarify) that any developer contributions sought at planning application stage for major development on site SM16 will need to be based on viability assessment at that stage.
- In other words, Medway *should not assume* that a planning application for major development at site SM16 shortly after the adoption of the Local Plan and that complies with the draft SPD (and therefore comprising an up to date plan) is necessarily viable. It will still require a bespoke approach to consideration of planning obligations, with benefit of a viability appraisal. This could reasonably be clarified at paragraph 5.3.5.
- A bespoke approach to contributions relating to site SM16 would necessarily cover *all* potential obligations within the SPD. For example, Peel Waters does

not necessarily expect to provide 4% serviced development plots for self build on site SM16 as set out at paragraph 6.2.1, which proposes a mix of town houses and apartments, so is more than just a 'flatted' development.

- Our comments submitted to the policies in the Regulation 19 Draft in August 2025 remain valid in so far as they flagged similar points about SM16 requiring a bespoke approach to contributions based on viability and site suitability for elements including affordable housing (policy T3); self build (T9); culture (S14); open space, sports and play space (DM21) and infrastructure delivery (S24).

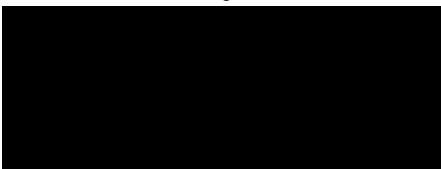
On other more detailed points, we would be grateful if the draft could be checked to clarify:

16.5.1 – if the formulae for like for like or 2 for 1 replacement habitat should be removed given the legal requirement is for a minimum 10% biodiversity net gain?

19.6.1 – relating to highways capacity, the reference to contributions towards mitigation '*with a view to ensuring a nil detriment impact*' goes beyond and should be amended to '*no unacceptable impact*' to reflect the NPPF, which advises at paragraph 116, that '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*'

Overall, Peel Waters supports the draft Plan, which it believes is sound, having been positively prepared, justified and will be more effective if SM16 can apply a bespoke approach to overall viability and developer contributions.

Yours faithfully,



Director

**cc:** L Thomas, Peel Waters



# Medway Developer Contribution Guide (2026)

REPRESENTATIONS SUBMITTED BY

**THE KENT SME DEVELOPERS NETWORK**

May 2026



**SME Developer Network**  
Kent



**DEVELOPER CONTRIBUTION GUIDE (2026)**

**REPRESENTATIONS SUBMITTED BY  
THE KENT SME DEVELOPERS NETWORK**

**MAY 2026**



SME Developer Network  
Kent

Esquire Developments  
Studio 3 The Old Laundry  
Green Street Green Road  
Longfield, DA2 8EB



**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Esquire Developments Ltd.



## CONTENTS

## Page No.

1.0	INTRODUCTION .....	1
2.0	RESPONSE TO THE DEVELOPER CONTRIBUTIONS GUIDE (2026) .....	6
2.1.	Evidence Base .....	6
2.2.	The Scale of Contributions .....	7
2.3.	Clarity of the Guide and IDP .....	9
2.4.	Viability in the Local Plan.....	10
2.5.	Future Housing Provision .....	12
3.0.	SUMMARY .....	13

## APPENDICES

### APPENDIX 1 – The Role of SMEs



## 1.0 INTRODUCTION

### i) About the Kent SME Developers Network

- I.1. These representations have been prepared by the Kent SME Developer Network (the Network) in response to Medway Council's (the Council) Developer Contributions Guide (2026).
- I.2. The Network is a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.
- I.3. The Network was formed in November 2019 and presently comprises approximately 40 participants including SME Housebuilders and Developers of varying size and scale and Registered Providers. The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward small and medium sized developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.
- I.4. Since the formation of the Network, a key objective has been to increase the profile of SMEs and lobby key decision makers to improve the opportunity for SMEs. This includes engaging with the then Deputy General for DLUHC in summer 2023 and working with the HBF, being party to Developer round table discussions with the then Secretary of State, Michael Gove and the then Housing Minister, Rachael Mclean in November 2023.
- I.5. Most recently, in March 2025 the Chairman of the Network, Paul Henry was invited to No.10 Downing Street, along with a number of other Housebuilders (both SME and National) to meet with the Prime Minister and discuss directly the problems facing SMEs. The following week, as part of the HBF's work engaging with Government, further representatives of the SME Network and Esquire developments visited No10 with a round table discussion, specially focused on SME Housebuilder with policy advisors.
- I.6. In addition to the above, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared or knowledge/experiences drawn from in-



---

house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.

1.7. The Network comprises the following:

*SME Housebuilders and Developers*

- Esquire Developments
- Fernham Homes
- Wealden Homes
- Fernfield Homes
- Meridian Construction
- Aile Homes
- King and Johnstone
- Clarkmores
- Clarendon Homes
- Gillcrest Group
- A&E Property Ltd
- Country House Homes
- Classicus Estates
- Woodcroft Developments
- Provectus Developments
- Penenden Heath Developments
- Grandera Homes
- Jarvis Homes
- Aspire Designer Homes
- Kentish Projects
- Woolbro Homes
- Cooper and Cole
- Hillstone Homes
- RJC New Homes
- Wedgewood Homes
- TG Designer Homes
- Endeavour Construction Limited
- Unique Land



- Hodson Developments
- Quinn Estates
- Elivia Homes
- TB Holdings
- Thakeham Homes
- Pentland Homes
- Maidstone Mechanical
- Corker Brothers
- Toleman Homes

*Registered Providers*

- Moat
- MHS

*Local Planning Authorities*

- Medway Council
- Maidstone Borough Council
- Swale Borough Council
- Folkestone and Hythe Borough Council
- Tunbridge Wells Borough Council
- Tonbridge and Malling Borough Council
- Ashford Borough Council
- Canterbury City Council
- Dover District Council
- Sevenoaks District Council
- Kent County Council

*Agents*

- Marrons
- Tetlow King Planning
- David Hicken Associates
- Stantec
- Consilium Planning

*Others*

- Homes England



1.8. For clarity, the representations contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs, Agents or Others.

1.9. The Network delivers approximately 600 dwellings per annum collectively in the region. Whilst this number is 'small' when compared to the scale of volume/national housebuilders or the national context, it should not be underestimated the value and impact these businesses have on the local economy, including employing local people alongside supporting local labour supply chains and other SMEs associated in the construction Industry. Crucially, SME's offer the opportunity to the wider housing market in delivering choice, variation and high-quality homes.

**i) Content of Representations**

1.10. These representations focus on the content of the Developer Contributions Guide, its supporting evidence base, and the combination with the Infrastructure Delivery Plan (IDP) (2025).

1.11. Notwithstanding specific land interests of Members of the Network, our response has been prepared in objective terms, in response to the content of the consultation and in accordance with legal, procedural and soundness requirements of legalisation and the National Planning Policy Framework.

1.12. We support the adoption of a Contributions Guide, which will ensure the necessary infrastructure is delivered alongside development, whilst providing direction to developers, leading to more confidence when investing in land and associated costs to bring forward development. SMEs face greater risks and uncertainty compared to national housebuilders, based on the limited ability to absorb upfront costs and delays in the planning process, and the Guide in its current form lacks clarity and falls short of providing the direction required. The Council clearly support SME developers, as demonstrated in draft Policy T11 for small sites and SME housebuilders, and therefore we urge the Council to go further to make the Guide and supporting IDP clearer on where contributions will apply to ensure confidence in delivering homes in Medway.



- 1.13. While it is recognised that the Contributions Guide is not able to provide absolute clarity for every site and that not all contributions are applicable to all developments, we consider the Guide and evidence base must be strengthened to justify the requests. We also urge careful consideration regarding the quantum of contributions, which could have significant impacts on the deliverability of sites which are relied upon to meet the Council’s housing requirement.



## **2.0 RESPONSE TO THE DEVELOPER CONTRIBUTIONS GUIDE (2026)**

2.0.1. The current version of the National Planning Policy Framework was published in December 2024 (NPPF 2024). The NPPF sets out that planning obligations should only be used where it is not possible to address unacceptable impacts through planning condition, and must meet the test of Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (CIL Regs). The CIL Regs set out that a planning obligation may only constitute a reason for granting permission if it is:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

2.0.2. The Government has recently consulted on amendments to the NPPF published in December 2025. The NPPF consultation follows the 2024 iteration and the legal tests of the CIL Regs, by reiterating that obligations for community and public service infrastructure must be required for the specific development.

2.0.3. Nevertheless, the legal tests in the CIL Regs require sufficient evidence to be set out on the need for investment in infrastructure. At present, we do not consider that the evidence to support the Developer Contributions Guide is complete or robust and therefore does not meet the legal tests for adoption.

### **2.1. Evidence Base**

2.1.1. The consultation lacks the necessary supporting Evidence Base to underpin the requests for required infrastructure to support the level of contributions. Some evidence upon which the Guide relies is now of a significant age or appears to be in draft form. We note that the Inspectors have identified similar evidence base issues with the Regulation 22 examination of Local Plan 2041.

2.1.2. The Inspector has delayed the examination of the Local Plan to allow the Council to submit further evidence to support the Local Plan. In a similar vein, we do not consider this consultation to be supported by an adequate, or an up-to-date evidence base to justify the



contributions requested. A large proportion of services in the Guide, which require financial contributions, are reliant on draft or outdated evidence. This includes the Open Space/Outdoor Formal Sport, Indoor Sports and Leisure, and Public Realm Improvements, which would amount for up to £4,211.19 per dwelling, and the education services, that make up a significant proportion of the per dwelling cost, are supported by evidence from 2005/06 which we consider is not accurate.

2.1.3. Furthermore, the Council have not provided sufficient justification to show that such services are required and necessary in line with the CIL Regulations tests. For instance, we consider that the Cultural Services requests lack evidence to demonstrate that the new homes will place strain directly onto services to justify the financial request.

2.1.4. The importance of a complete and robust evidence base cannot be understated. In our view the consultation has been undertaken prematurely and does not meet the legal test of the CIL Regs. We therefore urge the Council to review comments from this consultation and reconsult on the Guide once a robust evidence base is available to justify the costs sought.

## 2.2. The Scale of Contributions

2.2.1. The consultation Guide sets out total contributions of £48,585.44 per dwelling, which does not include contributions towards travel or road infrastructure.

<b>Developer Contributions Guide consultation (2026)</b>	
<b>Contribution for</b>	<b>Amount per dwelling</b>
Bird disturbance mitigation (SAMMS)	£337.49
Community services	£251.84
Heritage and museums	£391.28
Library's expansion	£226.98
Library's new build	£419.14
Youth centres & facilities	£107.64
Nursery expansion	£2,541.88
Nursery new build	£3,034.90
Primary expansion	£6,239.16



Primary new build	£7,449.30
Secondary expansion	£6,038.77
Secondary new build	£6,350.56
Sixth Form expansion	£1,589.15
Sixth Form new build	£1,671.20
Open Space	£3,506.75
Indoor Sport & Leisure	£334.63
Public Rights of Way	£75.00
Waste and Recycling	£237.84
Public Realm & Town Centre Enhancement	£369.81
Social Care	£287.12
Health - Primary care	£2,000.00
Health - Community care	£400.00
Health - Secondary/Acute care	£4,800.00

2.2.2. We acknowledge that the guide states that education contributions will only be sought from a development for either the expansion of an education facility or the development of a new school or library, depending on which is required. Therefore, assuming a development only paid for the expansion of existing facilities, the total contribution would equate to £29,735.34 per dwelling. Alternatively, for wholly new facilities, the per dwelling contribution would equate to £32,024.50 per dwelling.

2.2.3. Moreover, contributions of this scale inevitably have a significant bearing on development viability. Without sight of the updated viability assessment, it is unclear how the Council can be confident that schemes, particularly those on more marginal sites, are capable of absorbing these levels of financial requests. In the absence of transparent, up-to-date viability evidence, there is a real risk that the cumulative burden of obligations will render proposals unviable, ultimately undermining the delivery of much-needed housing and employment space.

2.2.4. This concern is especially acute for small and medium-sized enterprises and SME developers, who typically operate with tighter margins and less capacity to absorb unexpected or disproportionate costs. Excessive or insufficiently justified contributions can therefore have a significant impact on their ability to bring forward sites, reducing diversity in the local development market and limiting opportunities for SMEs to contribute to growth. It is



essential that the Council ensure that contribution levels are evidence-based, proportionate, and viability-tested if the Guide is to support, rather than constrain, sustainable development across the Medway.

### **2.3. Clarity of the Guide and IDP**

- 2.3.1. The Council set out in the Cabinet report (March 2026) that the Guide “enables developers to understand the costs involved prior to purchasing land for development”, however we do not consider that the consultation document achieves this goal.
- 2.3.2. Although some of the financial contributions set out clear guidance on where development would be required, such as the Heritage and Tourism (1km catchment) or the Youth centres (should no provision be delivered), others are not clear and do not provide confidence to a developer. For instance, the education contributions are not clear when a development would be expected to contribute to the construction of a new school. We also consider the education requests lack the evidence for the associated costs or the required justification on how the Council reached the figures presented.
- 2.3.3. The Council’s IDP sets out the costing for education facilities in locations around Medway. For example, in Hoo there are three projects for new primary schools, with two seeking to relocate and expand existing primary schools, which have estimated cost of circa £10-12,000,000. However, the IDP is not clear that all developments in the areas, both allocated and unallocated sites, will be required to contribute. Further, for the relocation of existing education facilities, the cost associated with the preparation of the land for the facility and the value of land of the existing facility should be taken into consideration. Has the Council afforded for these factors in the cost of infrastructure across the IDP and Contributions Guide?
- 2.3.4. Moreover, there are 17 uncoded infrastructure items in the IDP; with the majority (14) being Medway / Medway Wide costs, which similarly fails to provide clarity to developers seeking to bring forward development in Medway. While we anticipate that all allocations would also be required to contribute to the Medway wide costs, which include the majority of highway improvements, this will add significant costs to the baseline set in the Developer Contributions Guide of up to £16,000 per unit. This increase is significant and amounts to



almost the entire developer contributions costed in the Local Plan Viability Assessment (2025), which has not been updated since the Regulation 19 Local Plan consultation.

2.3.5. It is acknowledged that the IDP and Contributions Guide are 'live' documents, which will be updated continually when cost items evolve or through indexation. However, we do have concern that both the IDP and Contribution Guide are not costed in the Local Plan Viability Assessment (2025), which could have impacts on the development being deliverable over the plan period.

## **2.4. Viability in the Local Plan**

2.4.1. The Local Plan consultation was supported by Evidence Base, which included a Local Plan Viability Assessment (LPVA) (June 2025). The LPVA informs the development of the Local Plan and is required to ensure that the allocated developments are deliverable.

2.4.2. The LPVA sets out the amount per dwelling contributions are £17,786.93, but that "the average amount agreed on recently approved schemes is a little under £10,000/unit" (paragraph 7.35). The average amount being lower than the per dwelling contribution is acknowledged, however the figures within the LPVA are starkly different to the Contribution Guide (2026).

2.4.3. The LPVA sets out developer contributions in Table 8.10 and for the costed viability of the Local Plan (2041). The table below compares the contributions per dwelling with those in the Contributions Guide (2026):

Contribution for	LPVA	Contributions Guide
	(June 2025)	(2026)
	Amount per dwelling	Amount per dwelling
Bird disturbance mitigation (SAMMS)	£337.49	£337.49
<b>Cultural services:</b>		
• Community services	£251.84	£251.84
• Heritage and museums	£391.28	£391.28
• Libraries	£226.98	£226.98
<b>Education:</b>		
• Nursery	£1,895.24	£2,541.88
• Primary	£4,651.96	£6,239.16
• Secondary	£3,685.91	£6,038.77
• Sixth form	£970.26	£1,589.15
Health	£869.11	£2,000 (Primary) £4,000 (Community) £4,800 (Secondary/Acute)
Social Care	-	£287.12
Open/play space, outdoor formal sport	£3,506.75	£3,506.75
Sports facilities	£334.63	£334.63
Waste and recycling	£237.87	£237.84
Youth provision	£107.64	£107.64
Public Realm	£245.00	£369.81
PROW	£75.00	£75.00
<b>TOTAL</b>	<b>£17,786.93</b>	<b>£29,735.34</b>

*Note - The figures listed for education and libraries are the expansion of these facilities. It is also noted that the separated health contributions are listed as maximums ('up to').*

2.4.4. The table demonstrates that the per dwelling cost has increased by circa 67%, against request of the Developer Contributions Guide alone. However, the Council's IDP seeks costs that are



---

not included in the Guide, such as transport and highway improvements, which would increase per plot prices.

2.4.5. This increase is significant and we question whether the contributions have been tested by the Council to ensure that the Guide does not render sites undeliverable, and the Local Plan found unsound as a result.

2.4.6. Therefore, we recommend that the Council update the viability assessment to fully understand that the contributions sought from the allocated sites are viable and do not impact future housing provision. Further, the Council should provide clarity on how the Developer Contributions Guide and Infrastructure Delivery Plan relate to each other.

## **2.5. Future Housing Provision**

2.5.1. The Development Contribution Guide consultation would be adopted alongside the new Local Plan, which is significantly progressed at Regulation 22 stage. The Local Plan confirms that the Council's housing need will be met in full – an approach which we support – however we are concerned that the Contribution Guide will have profound impacts on delivery and viability of sites and therefore the soundness of the Local Plan.

2.5.2. The intention of the Guide to mitigate impacts of development is supported in line with the NPPF, however the Guide does not provide the necessary assurances to developers on the associated costs through clear direction or a robust evidence base to justify requests. The Council will appreciate the significant investments that developers must commit to bring an application forward, and the uncertainty of viability and costs caused by the Guide could result in market caution to deliver development in Medway.



### **3.0. SUMMARY**

3.0.1. We support the adoption of a Developer Contributions Guide, to mitigate the impact of development in Medway and to enable developers to understand the costs involved early in the process. However, the consultation Guide and IDP are not supported by sufficient evidence base to justify the contributions sought.

3.0.2. Therefore, we urge the Council to review the comments from this consultation, complete the supporting evidence base and supporting viability assessment, before reconsulting the Guide.

3.0.3. The Kent SME Network would like to be kept informed of all forthcoming consultations on the Local Plan and associated documents, and welcome a re-consultation of the Developer Contributions Guide.

## APPENDICES

**APPENDIX 1**  
**The Role of SMEs**



## THE ROLE OF SMEs

1.1 This statement set out the importance currently being placed by successive Central Governments on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders, who have been described as being of ‘National Importance’ and ‘the back bone of house building in the UK’, will play in complementing volume housebuilders to deliver Local and National housing requirements.

### A. The Previous Conservative Government’s Position on SME’S

#### i) **Building More Homes – July 2016**

1.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020’s. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, ‘Building More Homes’, published in July 2016<sup>1</sup>. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.

1.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live\_Table 109) and in 2017-18<sup>2</sup> only 222,194 dwellings (Live\_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

#### ii) **Home Builders Federation – January 2017**

1.4 In January 2017, the Home Builders Federation prepared a research paper titled ‘Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes’<sup>3</sup>. This document highlighted a number of facts, inter alia:

- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
- In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.

---

<sup>1</sup> <https://publications.parliament.uk/pa/ld201617/ldselect/ldconaf/20/20.pdf>

<sup>2</sup> 2018-19 data is not yet complete.

<sup>3</sup> [https://www.hbf.co.uk/documents/6879/HBF\\_SME\\_Report\\_2017\\_Web.pdf](https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf)



- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.
- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

1.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:

1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

1.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

### iii) White Paper – February 2017

1.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'<sup>4</sup> only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,

---

4

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/590464/Fixing\\_our\\_broken\\_housing\\_market\\_-\\_print\\_ready\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)



3. The construction industry is too reliant on a small number of big players. (our emphasis)

1.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.' (our emphasis)*

1.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

**iv) House of Lords Debate – January 2018**

1.10 On 11 January 2018, the House of Lords debated 'Housebuilding in the UK'<sup>5</sup> and noted the performance of the UK's major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *'that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.*

**v) Revised NPPF – July 2018**

1.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018<sup>6</sup>, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of 'allocations' and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

---

<sup>5</sup> <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

<sup>6</sup>

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>



vi) **Letwin Independent Review of Housing Build Out Rates – October 2018**

1.12 In October 2018, Sir Oliver Letwin issued his final ‘Independent Review of Build Out’<sup>7</sup> report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.

1.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the ‘*build out rate*’ on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).’

vii) **Homes England Strategic Plan 2018-2023 – October 2018**

1.14 In October 2018, Homes England released its 5-yr ‘Strategic Plan 2018-2023’<sup>8</sup> plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.

1.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

***There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.***

***This is why we’ll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England***

---

7

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752124/Letwin\\_review\\_web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf)

<sup>8</sup> <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>



***will work with house builders to promote better design and higher quality homes.***

- 1.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.
- 1.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

**viii) House of Commons Briefing Paper – December 2018**

- 1.18 On 12 December 2018, a House of Commons Briefing Paper titled *'Tackling the Under-Supply of Housing in England'*<sup>9</sup> was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail 'Support for SME Developers'.
- 1.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that *'While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo 'fierce' competition for land "while remaining uncertain as to what planning permission they will be able to secure."* *The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.* (our emphasis)
- 1.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that *'This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output'*.

---

<sup>9</sup> <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>



- 1.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that *‘in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers. The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in ‘significant’ financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government’s house building target]...will be less likely.’*
- 1.22 Problems accessing finance can have an impact on house builders’ ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.
- 1.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund “providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: “The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 1.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.



**ix) Revised NPPF - February 2019**

1.25 In February 2019, the latest version of the NPPF<sup>10</sup> was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the planned system. Paragraph 68 of the NPPF 2019 states:

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

1.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.

1.27 WDC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing,

---

10

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)



some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.

1.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.

**x) Speech by Minister of State for Housing, Esther McVey – September 2019**

1.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech<sup>11</sup> at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *'and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME's, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.'*

**xi) Statement of Minister of State for Levelling Up, Housing and Communities – July 2023**

1.30 In July 2024, the SoS spoke to the long-term plan for housing. Within this statement, the SoS committed to a new era of regeneration, inner-city densification and housing delivery across England, with transformational plans to supply beautiful, safe decent homes in places with high-growth potential in partnership with local authorities.

1.31 In addition to targeted action in a few high-potential areas, the government's plan delivers a package of reforms to unleash building on underused sites in high-demand regions. As part of the package of reforms, the SoS states that development should proceed on sites that are adopted in a Local Plan with full input from the local community, unless there are strong reasons why it cannot. Local Councils should be pragmatic in agreeing changed to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed.

---

<sup>11</sup> <https://www.gov.uk/government/speeches/resi-convention-2019>



- 1.32 Furthermore, the SoS encouraged the better use of small pockets of brownfield land by being more permission, so more homes can be built more quickly, where and how it makes sense, giving more confidence and certainty to SME builders.

**xii) Revised NPPF – December 2023**

- 1.33 In December 2023, the NPPF was further revised<sup>12</sup>. This continued the previous iterations of the NPPF in respect of the vision to encourage smaller sites to come forward through the plan-making system. The updated para 70 continues to make clear that small and medium sized sites can make an important contribution to meeting housing needs in an area. Para 70 goes on to seek that 10% of small sites are no larger than 1ha should be identified. The revised NPPF adds another requirement for:

**“e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”**

- 1.34 It is recognised that the delivery of smaller sites can address the immediate housing crisis in the short term. It is understood that smaller sites can come forward quickly, developed by local SMEs with a vested interest in delivering the site within a short timeframe. The larger strategic sites take significant time to be promoted through the Plan-making stage, as well as through the application stage, ensuring the infrastructure requirements to support large scale developments are fully considered before development can commence.

**vi) Revised NPPF – December 2024**

- 1.35 In December 2024, the NPPF was revised by the recently elected Labour Government<sup>13</sup>. The revised NPPF was introduced following the wide range of changes proposed by the Labour Party throughout their election campaign. This includes but is not limited to, a requirement for all Council’s to meet their housing requirement, as calculated via the amended Standard Method unless ‘hard constraints’ such as flood risk demonstrate that it is not possible. As a result of the amended methodology for calculating housing need, the yearly housing target across the Country has increased to 370,000 homes per annum.

---

<sup>12</sup> [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

<sup>13</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



- 1.36 A significant change as part of the 2024 revised NPPF is the removal of the amendments published within the 2023 revised NPPF. This includes the removal of 4-year housing land supply.
- 1.37 Furthermore, in an attempt to meet their housing need, the Government have introduced the concept of Grey Belt, whereby poorly performing Green Belt is deemed appropriate for development, where it meets the identified 'golden rules' of the NPPF, i.e. 50% affordable housing.
- 1.38 There is a clear drive from Government to increase house building across the country, improve affordability through the building of 370,000 homes per annum, with a particular focus on delivering affordable homes.

**B. Pace of Delivery of an SME**

- 1.39 SME's help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME's into the housing market, LPAs can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.
- 1.40 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.
- 1.41 The SME business model is usually set up differently to volume housebuilders. SME's are more flexible in matters such as design and landowner negotiations. In addition, SME's also try to limit their financial risk/exposure. As a result, there are a number of factors that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites



and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

## 2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

## 3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

## 4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers being involved in the process and being 'hands-on'. As a result, there is a less hierarchal structure and decisions can be made quickly and efficiently – again reducing time.

## 5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

## 6. Sales Rates



- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.

1.42 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled ‘Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)’<sup>14</sup>. The report recognised that *‘Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes’*.

1.43 The report continues that *‘past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result’*. NLP suggest that if authorities’ Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *“the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.”*

#### **vii) Revised NPPF – July 2021**

1.44 The NPPF was revised in July 2021<sup>15</sup> to accommodate a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the planning and development process should achieve. Furthermore more, it confirmed development that is not well designed, should be refused and conversely, significant weight should be given to developments which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SME’s as well placed in this regard to meet these challenges successfully.

1.45 The updated NPPF also amended the numbering of paragraph 68 to paragraph 69, but made no text changes to the 2019 version.

---

<sup>14</sup> <https://lichfields.uk/media/1728/start-to-finish.pdf>

<sup>15</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



**viii) The Bacon Review (August 2021)**

- 1.46 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published<sup>16</sup>. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.
- 1.47 The report outlined how smaller firms now account for only 12% of new housing stock and *'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'*.
- 1.48 The review continues that *the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.*

**ix) Meeting Housing Demand, House of Lords Select Committee (January 2022)**

- 1.49 In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand'<sup>17</sup>. A series of recommendations to Government about addressing housing demand. This included recommendations on the planning system as well as the role of SMEs (Chapter 4). The report confirmed:

*'In this report, we call on the Government to take action and remove the administrative and other blockers which, at present, make increasing the number of homes built much more difficult. We recognise that these challenges play out differently across the country as a whole. London and the South East face different challenges to other regions, as do those at different ends of the affordability scale.'*

***Small and Medium-sized Enterprises (SMEs)***

*The role of SMEs in the housebuilding industry has collapsed: in 1988, SME housebuilders built 39% of new homes; now they build just 10%. If housing*

---

<sup>16</sup> <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

<sup>17</sup> <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/reports-responses/>



*demand is to be met, SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance. We also provide options for a fast-track planning process for SMEs to reduce delays and planning risk.*

1.50 In terms of summary of conditions, in respect of SME's the report made the following:

*SMEs*

*12. The role of SMEs in the housebuilding industry has seen a sharp decline: in 1988, SME housebuilders built 39% of new homes, by 2020 this had dropped to 10%. The Government should encourage SME housebuilders in order to diversify the market and maintain competition. (Paragraph 103)*

*13. Local authorities should support SME housebuilders to navigate the planning process. One focus of the Government's planning reforms should be to reduce planning risk by making decisions more predictable and reducing delays, which will benefit SMEs. The Government should work with local planning authorities to create a fast-track planning process for SMEs. (Paragraph 104)*

*14. Wider adoption of the 'master developer' model, where larger sites are built out by a number of different housebuilders, would help SME housebuilders bid for more secure developments. The Government should require local planning authorities and Homes England to increase the percentage of homes on larger sites each year which are built by SME housebuilders. (Paragraph 108)*

*15. Access to finance is one of the key barriers for SME housebuilders. The Government should work with lenders to encourage them to provide more support to SME housebuilders on commercial terms. (Paragraph 112)*

1.51 In March 2022, the Government published its response to the report<sup>18</sup>. In response to matters relating to SME's, the Government responded in the following ways:

*'We agree with the Committee that there remain some specific barriers to increasing housing supply. To alleviate these, we are continuing to drive up the supply of good quality new homes that people need and want, including by diversifying the market and supporting SMEs through the Government's Levelling Up Home Building Fund'*

---

<sup>18</sup> <https://committees.parliament.uk/publications/9234/documents/159940/default/>



*The Government wants to increase competition in the housebuilding market, supporting SME housebuilders to deliver the choice of housing consumers need and want in this country. We agree with the Committee's report that SMEs have a vital role in making the housing market more diverse, competitive and resilient, and we are committed to ensuring the right support is in place. SMEs have a vital role in training and retaining their workforce, including delivering apprenticeships.*

*As stated in the Committee's report (p. 43), Government is aware that historically the three main barriers SMEs identify as facing are planning, land and finance. We have put in place a package of measures, including financial initiatives to help SMEs grow and develop, such as the Home Building Fund and the ENABLE Build Guarantee scheme. The Home Building Fund will see up to £3 billion of funding or short-term development loans provided to SMEs, custom builders and developers using modern methods of construction. It has supported many new sector entrants, with two thirds of the SMEs who have utilised funding existing for less than three years. We have committed 91% of the initial £2.5 billion development finance allocated to the Home Building Fund, and 94% of contracted transactions are with SMEs, two-thirds of which had existed for less than three years when accessing the fund. Home Building Fund development finance is now expected to support close to 70,000 homes once fully committed.*

*Funding has contributed to interventions like the Housing Accelerator Fund, a lending alliance between Homes England and United Trust Bank which provides SMEs with development finance at up to 70% Loan to Gross Development Value, and the Housing Delivery Fund, set up with Barclays, which provides £1 billion of loan finance to help support small and medium sized developers, speeding up the delivery of thousands of new homes across England.*

*To build on the success of the Home Building Fund, we have now launched a £1.5 billion Levelling Up Home Building Fund. This will provide loans to small and medium sized builders and developers to deliver 42,000 homes, with the vast majority going outside London and the South East.*



*We welcome the Committee's suggestions on planning and land. The Government is considering how to best take forward proposals around changes to the planning system, including how they align with and support our wider mission to level-up the country and regenerate left-behind places. Within this, we are exploring further options to support prompt and faster build-out of sites as part of our proposed changes. These changes will support diversification by providing small builders with more speed and certainty in the planning process.*

**x) Levelling Up and Regeneration Bill: Reforms to National Planning Policy (Dec 2022) Consultation**

1.52 In December 2022, the Government consulted on the 'Levelling-up and Regeneration Bill: reforms to national planning policy'<sup>19</sup>. This proposed a suite of amendments to the NPPF. Specifically, in relation to SME'S, the consultation made the following statement:

***More small sites for small builders***

*10. Small sites play an important role in delivering gentle density in urban areas, creating much needed affordable housing, and supporting small and medium size (SME) builders. Paragraph 69 of the existing National Planning Policy Framework sets out that local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Framework also asks local planning authorities to use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; and to support the development of windfall sites through their policies and decisions. Local planning authorities are asked to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

*11. We have heard views that these existing policies are not effective enough in supporting the government's housing objectives, and that they should be strengthened to support development on small sites, especially those that will*

---

<sup>19</sup> <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>



*deliver high levels of affordable housing. The government is therefore inviting comments on whether paragraph 69 of the existing Framework could be strengthened to encourage greater use of small sites, particularly in urban areas, to speed up the delivery of housing (including affordable housing), give greater confidence and certainty to SME builders and diversify the house building market. We are seeking initial views, ahead of consultation as part of a fuller review of national planning policy next year. Alongside this, the government has developed a package of existing support available for SME builders, including the Levelling Up Home Building Fund which provides development finance and Homes England's Dynamic Purchasing System which disposes of parcels of land.*

1.53 Two important questions were asked as part of the consultation:

**Q.24** Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

**Q.25** How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

1.54 Notwithstanding the above, in December 2023 a revised NPPF was released that made no change to the position of SME Housebuilders. Shortly thereafter, a General Election was called and in July 2024, Labour won the majority of Parliament.

#### **The New Labour Governments Position on SME House builders**

1.55 A key component of Labours manifesto and pledge was that it would deliver 1.5 million new homes in the 5 year term and radically seek to overhaul the planning system. Labour recognises the important role housebuilding plays in the countries economic success and wants to get 'Britain Building again and deliver economic growth'. Alongside the planning and infrastructure bill a revised NPPF was consulted on and released in December 2024.

1.56 The consultation version was consulted on in September 2024. It provided positive steps towards improving the planning system and seeking to ensure homes were delivered. This included simplifying the plan making process. The consultation acknowledge the issue



surrounding SME Developers, but suggested that no immediate amendments to the NPPF were identified to be implemented at that time.

#### **Revised NPPF – December 2024**

1.57 The December 2024 NPPF did indeed make radical changes to the planning system. It introduced the concept of Grey-Belt, amended the standard methodology for calculating housing need and made those figures mandatory and sought to place greater emphasis on delivery of infrastructure, affordable homes and Local Plans.

1.58 As anticipated, the SME component was left unchanged.

1.59 However, in May 2025, a planning reform working paper relating to Site Thresholds was released. This consultation acknowledges the need to support SME's recognised the strength of feeling that current policy around smaller developments is not working for local planning authorities or SME developers. It further states:

*The paper primarily explores the simplification of planning requirements for the smallest of sites and the introduction of a medium-sized site threshold within the planning system – in recognition of the particular needs of this scale of development. These changes aim to provide certainty to the sector, ensure the planning system is more targeted and proportionate across different scales of development, and help small and medium builders (SMEs) deliver the homes our communities need.*

1.60 The introduction continues:

*SME builders play a crucial role in driving up housebuilding rates – by bringing diversity and competition to the market and supporting faster build out rates. SMEs build out the majority of small sites, which supports the efficient use of land, maximises opportunities for gentle densification, and responds to local housing needs. They also contribute to thriving, successful places through the provision of associated infrastructure which supports new development. That is why supporting SMEs forms a key pillar of the upcoming Long-Term Housing Strategy.*

*However, this part of the sector has faced significant challenges in recent years – a third of SME developers have ceased operating over the last two decades, and the largest developers have become increasingly dominant – accounting for roughly 90% of volume growth. Recent analysis from the Federation of Master Builders (FMB) highlights ongoing*



*challenges, with the proportion of planning permissions granted on sites with 1 to 9 units having steadily declined over the past 13 years, falling from 21% in 2010-11 to 9.3% in 2023-24 – a marked reduction from previous contributions by SMEs. Addressing this trend, reducing risks and costs, and removing barriers to entry is key to supporting the government’s ambitions for a reformed housebuilding system, with SMEs playing a leading role.*

- 1.61 Whilst the final outcome of the consultation is not yet know, there are a number of proposals which would seek to support the SME sector, including minor, small and medium size sites. The recognition of simplifying the process, reducing burden and costs is welcomed and long overdue. These reforms do represent a major step change in support of SMEs and if SMEs are to be the backbone of the housebuilding industry, need to be implemented and delivered.

### **C. Conclusion**

- 1.62 The role of SMEs has been fully recognised by successive Central Governments (both in the house of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the now 1.5m homes in the next term target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.
- 1.63 The 2024 NPPF has some provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.
- 1.64 Most recently the Governments consultation to reforms small and medium size sites is welcomed and acknowledges the commitment to supporting SMEs and recognising their role in meeting housing demand.

### **The Kent SME Developers Network**

**June 2025**



**REPRESENTATIONS  
TO MEDWAY  
COUNCIL  
MEDWAY  
DEVELOPER  
CONTRIBUTION  
GUIDE**

**Representation submitted  
by Esquire Developments  
Ltd**

**MAY 2026**



ESQUIRE  
DEVELOPMENTS

Esquire Developments  
Studio 3 The Old Laundry  
Green Street Green Road  
Longfield, DA2 8EB

Tel: 01474 706 184  
e-mail: [awilford@esquiredevelopments.com](mailto:awilford@esquiredevelopments.com)

The contents of this document must not be copied  
or reproduced in whole or in part without the  
written consent of Esquire Developments Ltd.

# CONTENTS

<b>1.0 INTRODUCTION</b> .....	1
<b>2.0 RESPONSE TO THE DEVELOPER CONTRIBUTIONS GUIDE (2026)</b> .....	4
<b>2.1. Evidence Base</b> .....	4
<b>2.2. The Scale of Contributions</b> .....	5
<b>2.3. Clarity of the Guide and IDP</b> .....	6
<b>2.4. Viability in the Local Plan</b> .....	7
<b>2.5. Future Housing Provision</b> .....	9
<b>3.0. SUMMARY</b> .....	10

## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent.
- 1.2 These representations respond to Medway Council (MC) Developer Contribution Guide published for consultation between March 2026 and May 2026.
- 1.3 Esquire Developments has completed developments in the Borough, including:
- Manor Farm, West Street, Cliffe
  - Courtole Farm, Pond Hill, Cliffe
  - Orchard View, View Road, Cliffe Woods
  - Woodlands, Town Road, Cliffe Woods
  - Appleyard Quarter, Stoke Road, Hoo
  - Sturdee Club, Stoke Road, Hoo
  - Honeywood Mews, Fenn Street, St Mary Hoo
  - Riverbourne, Elm Avenue, Chattenden
  - The Hollies, Sharnal Street, High Halstow
  - Foxglove Mews, Seymour Road, Rainham
  - Farriers Green, London Road, Rainham
- 1.4 We have continued land interest and are currently delivering sites in Medway including:
- Land northwest Ratcliffe Highway, Chattenden
  - Sharnal Street, Hoo
  - Rainham Parkside Village, Rainham
  - Lower Twydall Lane, Rainham
- 1.5 The representations focus on the content of the Developer Contributions Guide, its supporting evidence base, and the combination with the Infrastructure Delivery Plan (IDP) (2025).
- 1.6 Notwithstanding specific land interests, our response has been prepared in objective terms, in response to the content of the consultation and in accordance with legal, procedural and soundness requirements of legalisation and the National Planning Policy Framework.

- 1.7 We support the adoption of a Contributions Guide, which will ensure the necessary infrastructure is delivered alongside development, whilst providing direction to developers, leading to more confidence when investing in land and associated costs to bring forward development. SMEs face greater risks and uncertainty compared to national housebuilders, based on the limited ability to absorb upfront costs and delays in the planning process, and the Guide in its current form lacks clarity and falls short of providing the direction required. The Council clearly support SME developers, as demonstrated in draft Policy T11 for small sites and SME housebuilders, and therefore we urge the Council to go further to make the Guide and supporting IDP clearer on where contributions will apply to ensure confidence in delivering homes in Medway.
- 1.8 While it is recognised that the Contributions Guide is not able to provide absolute clarity for every site and that not all contributions are applicable to all developments, we consider the Guide and evidence base must be strengthened to justify the requests. We also urge careful consideration regarding the quantum of contributions, which could have significant impacts on the deliverability of sites which are relied upon to meet the Council's housing requirement.

### **About Esquire Developments**

- 1.9 Esquire Developments is a multi-award winning SME Housebuilder based in Longfield, Kent. Founded in 2011, it has quickly established itself through the delivery of high quality bespoke residential developments in Kent and Sussex. It was awarded Gold for Best Small HouseBuilder in the Country 2020 by WhatHouse and Bronze and Silver respectively for Best Medium Housebuilder in 2024 and 2025.
- 1.10 Esquire Developments has adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local community's needs. This is done through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design and greater understanding of the needs of the local community.
- 1.11 Each development is bespoke and there are no fixed house types. This allows us to be totally flexible when it comes to the choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.

- 1.12 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
  
- 1.13 As an SME Housebuilder, Esquire Developments can expediently deliver a high-quality product that brings variation and choice to the market and complement volume housebuilders, but with a real community focus.

## **2.0 RESPONSE TO THE DEVELOPER CONTRIBUTIONS GUIDE (2026)**

2.0.1. The current version of the National Planning Policy Framework was published in December 2024 (NPPF 2024). The NPPF sets out that planning obligations should only be used where it is not possible to address unacceptable impacts through planning condition, and must meet the test of Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (CIL Regs). The CIL Regs set out that a planning obligation may only constitute a reason for granting permission if it is:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

2.0.2. The Government has recently consulted on amendments to the NPPF published in December 2025. The NPPF consultation follows the 2024 iteration and the legal tests of the CIL Regs, by reiterating that obligations for community and public service infrastructure must be required for the specific development.

2.0.3. Nevertheless, the legal tests in the CIL Regs require sufficient evidence to be set out on the need for investment in infrastructure. At present, we do not consider that the evidence to support the Developer Contributions Guide is complete or robust and therefore does not meet the legal tests for adoption.

### **2.1. Evidence Base**

2.1.1. The consultation lacks the necessary supporting Evidence Base to underpin the requests for required infrastructure to support the level of contributions. Some evidence upon which the Guide relies is now of a significant age or appears to be in draft form. We note that the Inspectors have identified similar evidence base issues with the Regulation 22 examination of Local Plan 2041.

2.1.2. The Inspector has delayed the examination of the Local Plan to allow the Council to submit further evidence to support the Plan. In a similar vein, we do not consider this consultation to be supported by an adequate, or an up-to-date evidence base to justify the contributions requested. A large proportion of services in the Guide, which require financial contributions, are reliant on draft or outdated evidence. This includes the Open Space/Outdoor Formal Sport, Indoor Sports and Leisure, and Public Realm Improvements, which would amount for

up to £4,211.19 per dwelling, and the education services, that make up a significant proportion of the per dwelling cost, are supported by evidence from 2005/06 which we consider is not accurate.

2.1.3. Furthermore, the Council have not provided sufficient justification to show that such services are required and necessary in line with the CIL Regulations tests. For instance, we consider that the Cultural Services requests lack evidence to demonstrate that the new homes will place strain directly onto services to justify the financial request.

2.1.4. The importance of a complete and robust evidence base cannot be understated. In our view the consultation has been undertaken prematurely and does not meet the legal test of the CIL Regs. We therefore urge the Council to review comments from this consultation and reconsult on the Guide once a robust evidence base is available to justify the costs sought.

## 2.2. The Scale of Contributions

2.2.1. The consultation Guide sets out total contributions of £48,585.44 per dwelling, which does not include contributions towards travel or road infrastructure.

<b>Developer Contributions Guide consultation (2026)</b>	
<b>Contribution for</b>	<b>Amount per dwelling</b>
Bird disturbance mitigation (SAMMS)	£337.49
Community services	£251.84
Heritage and museums	£391.28
Library's expansion	£226.98
Library's new build	£419.14
Youth centres & facilities	£107.64
Nursery expansion	£2,541.88
Nursery new build	£3,034.90
Primary expansion	£6,239.16
Primary new build	£7,449.30
Secondary expansion	£6,038.77
Secondary new build	£6,350.56
Sixth Form expansion	£1,589.15
Sixth Form new build	£1,671.20
Open Space	£3,506.75
Indoor Sport & Leisure	£334.63
Public Rights of Way	£75.00
Waste and Recycling	£237.84
Public Realm & Town Centre Enhancement	£369.81
Social Care	£287.12
Health - Primary care	£2,000.00
Health - Community care	£400.00
Health - Secondary/Acute care	£4,800.00

- 2.2.2. We acknowledge that the guide states that education contributions will only be sought from a development for either the expansion of an education facility or the development of a new school or library, depending on which is required. Therefore, assuming a development only paid for the expansion of existing facilities, the total contribution would equate to £29,735.34 per dwelling. Alternatively, for wholly new facilities, the per dwelling contribution would equate to £32,024.50 per dwelling.
- 2.2.3. Moreover, contributions of this scale inevitably have a significant bearing on development viability. Without sight of the updated viability assessment, it is unclear how the Council can be confident that schemes, particularly those on more marginal sites, are capable of absorbing these levels of financial requests. In the absence of transparent, up-to-date viability evidence, there is a real risk that the cumulative burden of obligations will render proposals unviable, ultimately undermining the delivery of much-needed housing and employment space.
- 2.2.4. This concern is especially acute for small and medium-sized enterprises and SME developers, who typically operate with tighter margins and less capacity to absorb unexpected or disproportionate costs. Excessive or insufficiently justified contributions can therefore have a significant impact on their ability to bring forward sites, reducing diversity in the local development market and limiting opportunities for SMEs to contribute to growth. It is essential that the Council ensure that contribution levels are evidence-based, proportionate, and viability-tested if the Guide is to support, rather than constrain, sustainable development across the Medway.

### **2.3. Clarity of the Guide and IDP**

- 2.3.1. The Council set out in the Cabinet report (March 2026) that the Guide “enables developers to understand the costs involved prior to purchasing land for development”, however we do not consider that the consultation document achieves this goal.
- 2.3.2. Although some of the financial contributions set out clear guidance on where development would be required, such as the Heritage and Tourism (1km catchment) or the Youth centres (should no provision be delivered), others are not clear and do not provide confidence to a developer. For instance, the education contributions are not clear when a development would be expected to contribute to the construction of a new school. We also consider the

education requests lack the evidence for the associated costs or the required justification on how the Council reached the figures presented.

- 2.3.3. The Council's IDP sets out the costing for education facilities in locations around Medway. For example, in Hoo there are three projects for new primary schools, with two seeking to relocate and expand existing primary schools, which have estimated cost of circa £10-12,000,000. However, the IDP is not clear that all developments in these areas, both allocated and unallocated sites, will be required to contribute. Further, for the relocation of existing education facilities, the cost associated with the preparation of the land for the facility and the value of land of the existing facility should be taken into consideration. Has the Council afforded for these factors in the cost of infrastructure across the IDP and Contributions Guide?
- 2.3.4. Moreover, there are 17 uncosted infrastructure items in the IDP; with the majority (14) being Medway / Medway Wide costs, which similarly fails to provide clarity to developers seeking to bring forward development in Medway. While we anticipate that all allocations would also be required to contribute to the Medway wide costs, which include the majority of highway improvements, this will add significant costs to the baseline set in the Developer Contributions Guide of up to £16,000 per unit. This increase is significant and amounts to almost the entire developer contributions costed in the Local Plan Viability Assessment (2025), which has not been updated since the Regulation 19 Local Plan consultation.
- 2.3.5. It is acknowledged that the IDP and Contributions Guide are 'live' documents, which will be updated continually when cost items evolve or through indexation. However, we do have concern that both the IDP and Contribution Guide are not costed in the Local Plan Viability Assessment (2025), which could have impacts on the development being deliverable over the plan period.

## **2.4. Viability in the Local Plan**

- 2.4.1. The Local Plan consultation was supported by Evidence Base, which included a Local Plan Viability Assessment (LPVA) (June 2025). The LPVA informs the development of the Local Plan and is required to ensure that the allocated developments are deliverable.
- 2.4.2. The LPVA sets out the amount per dwelling contributions are £17,786.93, but that "the average amount agreed on recently approved schemes is a little under £10,000/unit" (paragraph 7.35). The average amount being lower than the per dwelling contribution is

acknowledged, however the figures within the LPVA are starkly different to the Contribution Guide (2026).

2.4.3. The LPVA sets out developer contributions in Table 8.10 and for the costed viability of the Local Plan (2041). The table below compares the contributions per dwelling with those in the Contributions Guide (2026):

Contribution for	LPVA	Contributions Guide
	(June 2025)	(2026)
	Amount per dwelling	Amount per dwelling
Bird disturbance mitigation (SAMMS)	£337.49	£337.49
<u>Cultural services:</u>		
• Community services	£251.84	£251.84
• Heritage and museums	£391.28	£391.28
• Libraries	£226.98	£226.98
<u>Education:</u>		
• Nursery	£1,895.24	£2,541.88
• Primary	£4,651.96	£6,239.16
• Secondary	£3,685.91	£6,038.77
• Sixth form	£970.26	£1,589.15
Health	£869.11	£2,000 (Primary) £4,000 (Community) £4,800 (Secondary/Acute)
Social Care	-	£287.12
Open/play space, outdoor formal sport	£3,506.75	£3,506.75
Sports facilities	£334.63	£334.63
Waste and recycling	£237.87	£237.84
Youth provision	£107.64	£107.64
Public Realm	£245.00	£369.81
PROW	£75.00	£75.00
<b>TOTAL</b>	<b>£17,786.93</b>	<b>£29,735.34</b>

*Note - The figures listed for education and libraries are the expansion of these facilities. It is also noted that the separated health contributions are listed as maximums ('up to').*

2.4.4. The table demonstrates that the per dwelling cost has increased by circa 67%, against requests in the LPVA. However, the Council's IDP seeks costs that are not included in the Guide, such as transport and highway improvements, which would increase per plot prices.

2.4.5. This increase is significant and we question whether the contributions have been tested by the Council to ensure that the Guide does not render sites undeliverable, and the Local Plan found unsound as a result.

2.4.6. Therefore, we recommend that the Council update the viability assessment to fully understand that the contributions sought from the allocated sites are viable and do not impact future housing provision. Further, the Council should provide clarity on how the Developer Contributions Guide and Infrastructure Delivery Plan relate to each other.

## **2.5. Future Housing Provision**

2.5.1. The Development Contribution Guide consultation would be adopted alongside the new Local Plan, which is significantly progressed at Regulation 22 stage. The Local Plan confirms that the Council's housing need will be met in full – an approach which we support – however we are concerned that the Contribution Guide will have profound impacts on delivery and viability of sites and therefore the soundness of the Local Plan.

2.5.2. The intention of the Guide to mitigate impacts of development is supported in line with the NPPF, however the Guide does not provide the necessary assurances to developers on the associated costs through clear direction or a robust evidence base to justify requests. The Council will appreciate the significant investments that developers must commit to bring an application forward, and the uncertainty of viability and costs caused by the consultation document could result in market caution to deliver development in Medway.

### **3.0. SUMMARY**

- 3.0.1. We support the adoption of a Developer Contributions Guide, to mitigate the impact of development in Medway and to enable developers to understand the costs involved early in the process. However, the consultation Guide and IDP are not supported by sufficient evidence base to justify the contributions sought.
- 3.0.2. Therefore, we urge the Council to review the comments from this consultation, complete the supporting evidence base and supporting viability assessment, before reconsulting the Guide.
- 3.0.3. Esquire Developments would like to be kept informed of all forthcoming consultations on the Local Plan and associated documents, and welcome a re-consultation of the Developer Contributions Guide.

Our Ref: 333103034/A3

**05<sup>th</sup> May 2026**

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

**RESPONSE TO THE MEDWAY DEVELOPER CONTRIBUTIONS AND OBLIGATIONS GUIDE  
CONSULTATION ON BEHALF OF TAYLOR WIMPEY**

Dear Dave,

This response is written on behalf of Taylor Wimpey, which has an interest in land west of Hoo St Werburgh. We welcome the opportunity to comment on the consultation draft of the Medway Developer Contributions and Obligations Guide (the 'Guide').

This response is intentionally focused on matters of process and soundness, rather than providing a detailed critique of the individual cost items or contribution requests set out within the Guide. Taylor Wimpey reserves the right to comment on the specifics of the document once the Guide has gone through a second consultation exercise following the conclusion of the examination towards the emerging Medway Local Plan and once sufficient viability testing of the Guide's contents has been carried out (see further on these points below).

Taylor Wimpey has significant concerns regarding the timing of this consultation and the proposed adoption of the Guide as a Supplementary Planning Document (SPD). As currently presented, the Guide is intended to be adopted in advance of the emerging Medway Local Plan and, crucially, prior to the examination of its supporting evidence base, including the Local Plan Viability Assessment. In our view, this approach is premature.

The Guide is clearly derived from and intended to support the evidence prepared for the emerging Local Plan. The Guide itself states that: *"For the purposes of preparing planning applications and their determination, this Guidance should be read alongside Development Plan Policies (Local Plans and Neighbourhood Plans) and relevant Supplementary Planning Documents. The Guide will also be used as the basis for Medway's response to proposed strategic growth strategies, providing evidence for the infrastructure delivery planning and viability assessments that underpin the Local Plan."* However, the evidence which underpins the Guide has not yet been tested through the independent examination process. As such, there remains a real possibility that elements of the evidence base particularly in relation to viability may be subject to change. Proceeding to adopt the Guide ahead of this process risks embedding requirements that have not been robustly or independently validated.

For additional context, in relation to the examination of the emerging Local Plan, the Inspectors published a letter (MLP/ED5) with initial queries to the Council after they identified some areas of concern which require further clarification from the Council in the early stages of the examination process. In the letter

10th Floor, Bank House,  
8 Cherry Street,  
Birmingham, B2 5AL

Telephone: +44 (0)121 633 2900  
email:  
Birmingham.uk@stantec.com

Registered Office:  
Stantec UK Ltd  
Buckingham Court  
Kingsmead Business Park  
Frederick Place, London Road  
High Wycombe HP11 1JU  
Registered in England No. 1188070

the Inspector's state that "Given that the examination of the Plan is currently at an early stage, its adoption is unlikely to occur during 2026".

Taylor Wimpey consider that the correct and sound approach would be to first progress the emerging Local Plan through examination. This would allow for full scrutiny of the Local Plan Viability Assessment which is part of the emerging Local Plan's evidence base as well as the associated evidence to ensure that policy requirements, including developer contributions, are found sound and deliverable in practice. Only once this process has concluded, and the evidence base has been confirmed as sound, the Council should then proceed with a further consultation on the Developer Contributions and Obligations Guide, prior to its adoption.

In addition to concerns regarding timing, we also note that the Guide, in its current form, lacks sufficient justification for the scale and nature of contributions being sought. The National Planning Policy Framework (NPPF) at paragraph 58 sets out that planning obligations must only be sought when the following tests have been met:

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

In particular to the Guide, there is limited clarity on how the requested contributions directly relate to the Infrastructure Delivery Plan (IDP), how they have been derived and how they will directly contribute towards delivery of the infrastructure identified within the IDP. This issue is compounded by the absence of clear and robust viability testing to demonstrate that the cumulative impact of these obligations would not prejudice the deliverability of development across Medway, including the proposed site allocations in the emerging Local Plan. Thus, it is not clear that the contributions and obligations within the Guide meet the relevant tests specified in the NPPF.

These concerns are fundamental, the NPPF is clear at paragraph 35 that policies development contributions should not undermine the deliverability of the plan. This theme is expanded upon in the Planning Practice Guidance (PPG) which states "*Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.*". PPG goes on to explain that it is the responsibility of plan makers to create realistic and deliverable policies. Without transparent justification and appropriate testing, it is not possible to conclude that the proposed approach taken in the Guide towards developer contributions and obligations meets the requirements specified in national planning policy.

Taylor Wimpey raised concerns about the evidence base including the Local Plan Viability Assessment during the Regulation 19 consultation in June last year as part of the Hoo Consortium (Church Commissioners; Dean Lewis Estates; Redrow; and Taylor Wimpey). The full response can be found in Appendix A of this letter. We now note that the Viability Letter (Appendix B of the Hoo Consortium response, dated 11 August 2025), is marked as a 'draft' in error, however we confirm that this is the final version, and its contents still apply.

In that response it was considered that further evidence is required in respect of the following “Local Plan Strategic Issues”:

1. Detailed testing of the scope of the road improvement / mitigation schemes to ensure that the schemes to be delivered match the levels of planned growth;
2. Land assembly testing to verify ownerships and to determine whether third party land is necessary and if so, whether it can be acquired by private treaty or whether CPO will be required;
3. Detailed testing of the costs of the implementation of the agreed road improvement / mitigation schemes;
4. Detailed testing of the costs of the implementation of the education provision; and
5. Review and updating of the Viability Assessment in respect of S106 contributions and apportionment across the Plan Area.

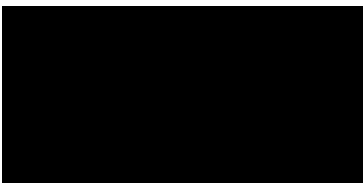
In summary, Taylor Wimpey considers that:

- The consultation and proposed adoption of the Guide as an SPD is premature;
- The Guide has not been subject to adequate viability testing, particularly in the absence of an examined and confirmed Local Plan evidence base;
- There is insufficient justification provided for the contributions sought and their relationship to the IDP.

We therefore strongly recommend that the Council defer adoption of the Guide until after the conclusion of the Local Plan examination, and undertake a further round of consultation at that stage, informed by a fully tested and sound evidence base.

We trust these comments are helpful and would be pleased to engage further with the Council as the process progresses.

Yours sincerely,



**Planning Associate  
Stantec UK Limited**

Encls: Appendix A - Reg 19 Hoo Consortium Response

## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official use  
only)

Name of the Local Plan to which this representation relates:

Medway Local Plan

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

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

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

This form has two parts –

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

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

## Part A

### 1. Personal Details\*

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

### 2. Agent's Details (if applicable)

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

---

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

---

Name or Organisation:

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

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

See attached

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

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

See attached

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

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

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

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

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

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

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

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

**To assist the Inspector in understanding the specific considerations for the Hoo Peninsula, the soundness issues identified and modifications to remedy.**

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

**For details of our data privacy policy please see:**

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



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

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

## Document Control Sheet

**Project Name:** Hoo Consortium

**Project Ref:** 333102261

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

**Doc Ref:** 333102261/A3/AJ

**Date:** 11 August 2025

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

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

## Contents

1	<b>Introduction</b> .....	1
2	<b>Duty to Co-operate</b> .....	4
3	<b>Vision and Strategic Objectives</b> .....	5
4	<b>Spatial Development Strategy</b> .....	7
5	<b>Natural Environment</b> .....	9
6	<b>Built Environment</b> .....	11
7	<b>Housing</b> .....	12
8	<b>Economic Development</b> .....	14
9	<b>Retail and Town Centres</b> .....	15
10	<b>Transport</b> .....	17
11	<b>Health, Communities and Infrastructure</b> .....	19
12	<b>Minerals Supply</b> .....	22
13	<b>Waste Management</b> .....	23
14	<b>Energy</b> .....	24
15	<b>Site Allocations</b> .....	25
16	<b>General Comments</b> .....	30

## Appendices

<b>Appendix A:</b>	<b>Pell Frischmann Transports/ Highways Representations (including draft Area-Wide Travel Plan and Sustainable Transport Strategy)</b>
<b>Appendix B:</b>	<b>Savills Viability Letter</b>
<b>Appendix C:</b>	<b>Bentley’s Costings and Benchmark Analysis</b>
<b>Appendix D:</b>	<b>Composite Masterplan</b>
<b>Appendix E:</b>	<b>Site Allocation Policies SA8 and SA9 Modifications</b>

This page is intentionally blank

# 1 Introduction

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

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

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

## 2 Duty to Co-operate

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

## 3 Vision and Strategic Objectives

### Vision (section 2.1; pages 16-18)

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

### Strategic Objectives (section 2.2; pages 18-20)

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

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

## 4 Spatial Development Strategy

### Chapter 3; pages 21-27

- 4.1 The Hoo Consortium supports the identification of the Hoo Peninsula, specifically the settlements of Hoo St Werburgh, Chattenden and High Halstow, as a location to deliver around 30% of housing needs during the Plan period. This will contribute to the aspiration of the emerging Local Plan to meet development needs in full (see page 25) which the Hoo Consortium welcomes.
- 4.2 To provide clarity, ***the emerging Local Plan would benefit from a strategic policy that clearly articulates the full development needs that the Plan seeks to deliver and spatial distribution thereof.*** Paragraph 20 of the National Planning Policy Framework (2024: 'NPPF') requires local plans to include strategic policies that make provision for, inter alia, sufficient homes and non-residential forms of development. Whilst a spatial vision is articulated in the emerging Local Plan (pages 25-27), a strategic policy confirming development needs and where they will be met is currently absent. This is required to ensure compliance with the NPPF.
- 4.3 The number of homes the emerging Local Plan seeks to provide for is set out in the introduction to the Plan (paragraph 1.3.6) and introduction to the Housing chapter (paragraph 6.1.2) but does not feature in any of the specific policies. ***There would be merit in the first policy/ policies in the Plan being strategic policies relating to the scale of development the Plan seeks to deliver and spatial strategy.*** This should be a focussed and succinct policy identifying the full needs for homes, how many are expected to be delivered each year and the components of supply (including commitments, allocations and windfall). This would be either part of or alongside a policy on the spatial distribution of development, providing clarity on the expectations for growth in different locations, the basis for the site allocations (at Chapter 14) and introducing the development that will then need to comply with and deliver on the subsequent policies in the Plan.

### Housing Trajectory

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

**Policies Map (page 27; separate maps)**

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

## 5 Natural Environment

### Policy S1: Planning for Climate Change

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

### Policy S2: Conservation and Enhancement of the Natural Environment

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

### **Policy DM3: Air Quality**

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

## **6 Built Environment**

6.1 No comments.

## 7 Housing

### Policy T3: Affordable Housing

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

### Policy T9: Self-Build and Custom Housing

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

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

## 8 Economic Development

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

## 9 Retail and Town Centres

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

### 9.2.1 Policy S16: Hierarchy of Centres

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

### 9.2.2 Policy T17: Impact Assessments

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

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

### 9.2.3 Policy S22: Hoo Peninsula

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

## 10 Transport

10.1 The Hoo Consortium has instructed Pell Frischmann to provide transport planning and highway engineering advice in respect of its interests on the Hoo Peninsula. Pell Frischmann has reviewed the transport, travel and highways infrastructure aspects of the emerging Local Plan and evidence base and prepared separate representations on these specific matters. These are included at Appendix A of this report and should be read in full as they comprehensively consider the merit of the approach taken and set out recommended areas for further work/ refinement.

10.2 The following is a high-level summary:

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

- f) Further work on 'cost apportionment' required that takes account of viability; this is understood to form part of a 'stage 2' that the Hoo Consortium would welcome engagement on.
- g) It is noted that the Lower Thames Crossing upgrades will remediate some but not all of the existing issues at Junction 1 of the M2; the Hoo Consortium would welcome confirmation as to the current position in respect of M2 J1.

10.3 In addition to the separate transport/ highway representations, Pell Frischmann has prepared:

- Draft Area-Wide Travel Plan
- Sustainable Transport Strategy

10.4 The purpose of the Area-Wide Travel Plan ('AWTP') is to provide a strategic vision, objectives and baseline targets for reducing car and promoting sustainable travel across the Hoo Peninsula. Future Site-Specific Travel Plans would then be developed in line with the AWTP to facilitate a cohesive and coordinated approach to sustainable transport that avoids piecemeal interventions.

10.5 The AWTP will help to facilitate the Sustainable Transport Strategy ('STS'). The STS sets out the sustainable, place-based vision for the Hoo Peninsula which puts people at the forefront of development and sets out an aspirational but deliverable strategy for achieving a step-change in sustainable transport options for existing and new residents.

## 11 Health, Communities and Infrastructure

### Policy T29: Community and Cultural Facilities

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

### Policy S24: Infrastructure Delivery

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

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

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

## **12 Minerals Supply**

12.1 No comments.

## **13 Waste Management**

13.1 No comments.

## 14 Energy

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

## 15 Site Allocations

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

### **Policy SA8: Hoo St Werburgh and Chattenden**

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

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

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

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

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

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

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

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

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

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

## 16 General Comments

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

## Appendix A

Project	Medway Local Plan Regulation 19
Document Title or Subject	Hoo Consortium Transport Representations
Document Reference	109345-PEF-XX-XX-TN-TR-004002
Revision Reference	P02
Date	11 August 2025

## 1 Introduction

### 1.1 Background

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

### 1.2 Scope of this Technical Note

- 1.2.1 Medway Council are developing a new Local Plan to provide the framework to guide the development and use of land in Medway up until 2041 and it will replace the previous 2003 Medway LP. MC released the LP for Regulation 18 consultation in July 2024 and released the revised evidence base and LP for Regulation 19 consultation in June 2025.
- 1.2.2 This TN sets out the representations of the Hoo Consortium with regard to the transport aspects of the LP, including:
- Their collective view on the extent to which the LP is suitable to achieve its transport aims;
  - How the LP relates to the proposals on the Hoo Peninsula; and
  - A high-level review of the LP transport proposals.
- 1.2.3 The Consortium have reviewed the available evidence base and the updated Regulation 19 LP main document. These representations focus on the following:
- Local Plan (Regulation 19 version)
  - Strategic Transport Assessment (STA)
  - Infrastructure Delivery Plan (IDP)
  - Proportionality Assessment (contained within the STA pack)
  - Assessments of M2 Junction 1 (contained in multiple documents under the STA pack)

## 2 Regulation 19 Transport Representations

### 2.1 Local Plan (Regulation 19 Version)

#### Vision for Medway

#### 2.1.1 Vision for Medway in 2041 (Section 2) states:

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

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

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

#### 2.1.2 The Consortium strongly believes, and has long maintained, that a vision-led approach to development with integrated public transport, walking, wheeling and cycling is key to the delivery of sustainable development in Medway.

#### 2.1.3 The Consortium notes that a lack of access to public transport is an issue cited by a 'vast majority' of existing residents in the Medway villages<sup>1</sup> and believes that new and improved bus services, enabled by new development, will be key to achieving long term modal shift. This will result in users moving away from private cars as the 'default' for local and strategic journeys both for new residents on the Peninsula and current residents living in the area. Active travel provides both the opportunity to reduce carbon impacts of travel whilst improving health outcomes.

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

#### **Policy S20: Strood District Centre**

#### 2.1.5 Policy S20 includes:

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

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

#### 2.1.6 The Consortium welcomes the inclusion of these items in the Strood centre policy, noting that the requirement for interchange between modes is one of the biggest barriers to modal shift. The need for any interchanges to be seamless and integrated is therefore essential.

#### 2.1.7 Fast and convenient interchanges between modes (e.g. at Strood) will be a key contributor to enabling longer distance travel to switch from the car to public transport modes. Strategic mode shift is likely to be most effective at limiting issues on the strategic network, such as at M2 Junction 1, and the Consortium would welcome plans for improvements at Strood to come forward as early as possible in the Local Plan period.

#### 2.1.8 Additional to Strood itself, this policy notes that Strood can provide a destination for a new Bus Rapid Transit (BRT) corridor to Hoo St Werburgh. The Consortium strongly welcomes the inclusion of this item in the Policy

---

<sup>1</sup> Medway Village Infrastructure Audit (June 2025)

(noting this is captured in more detail in Section 9 of the Local Plan). A new BRT connection between Strood and the Peninsula provides the opportunity for a real and tangible step-change in public transport provision to the current and future developments on the Peninsula and will provide a corridor around which sustainable-transport led development can come forward. It will ensure that buses provide a competitive and practical alternative to private car trips between two major trip generation areas, whilst also being relatively rapid to deliver and enabling new/expanded services to be implemented flexibly as demand builds.

- 2.1.9 BRT would also provide convenient interchange opportunities with Strood National Rail station as well as links towards onward routing into Rochester and to the west. As with the interchange point above, the Consortium would welcome BRT infrastructure coming forward at the earliest opportunity, noting that the infrastructure can come ahead of the future services, and that surety of routing and provision provides the certainty about which masterplans can be prepared and which new development can rely on from 'Day 1' to ensure that sustainable travel patterns are locked in from the outset of occupation.
- 2.1.10 It is also noted that the potential routing indicated on a number of diagrams in the Local Plan Evidence Base for the BRT cross some proposed land allocations of the Consortium members. The Consortium would welcome further engagement with Medway on the proposed routing, with a view to ensuring that the potential routing(s) are properly captured at the earliest stage of the site masterplanning process.

#### **Policy S22: Hoo Peninsula**

- 2.1.11 The Consortium welcomes the comprehensive set of allocations proposed under Policy S22 and looks forward to working in partnership with Medway Council and other stakeholders to bring forward successful sustainable transport-led places through the Local Plan period, should these be successfully allocated.

*"New growth for the Hoo Peninsula will require supporting infrastructure and three centres to provide for the needs of new residents."*

- 2.1.12 The Consortium notes and agrees the challenges and responsibilities which arise to being forward the level of development proposed. Through the inclusion of new, vibrant local and 'town centre' facilities, new (and existing residents) will have the choice to be able to meet their day-to-day needs in their locality without needing to drive to facilities elsewhere in the Borough.
- 2.1.13 The Consortium has a demonstrated record of cooperation with Medway Council and expects to continue to work closely with the Council (and others) to identify the issues at hand, and to develop a credible approach to dealing with the transport constraints of the Peninsula.

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

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

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

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

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

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

- 2.1.15 As noted above, the Consortium strongly welcomes the robust focus on place-based transport planning which is led by a vision for public transport (primarily bus-based), walking, wheeling and cycling. The aspiration for early delivery of the BRT corridor is welcomed (as discussed above).

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

- 2.1.16 With regards to a vehicle trip budget:

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

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

- 2.1.17 At time of writing the IDP does not define the vehicle trip budget, referring instead to a vehicle trip credit with no further qualification. Paragraphs 9.2.13 and 9.2.14 of the Local Plan (Reg 19 Version) state that the Strategic Transport Assessment (STA) will be the source for the vehicle trip budget, however these documents do not explicitly define what the vehicle trip budget will be, though it is appreciated that the relevant data is likely captured in the comprehensive appendices to that batch of documents.

- 2.1.18 Given the magnitude of the infrastructure costs which must be apportioned and which it is anticipated will depend on the vehicle trip budget/credit, the Consortium would welcome further discussions with Medway Council to establish in clear and definitive terms, what the relevant vehicle trip budget(s) are expected to comprise.

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

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

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

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

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

- 2.1.19 The Consortium welcomes a policy basis for managing vehicle trip credits but would query why the minimum cutoff of 50 homes / 5,000sqm floorspace is to be applied. Though not a large proportion of overall development, small developments are also contributors to the need to improve infrastructure provision on the Peninsula and so the Consortium would expect that they should fall under the same requirement as ‘windfall’ sites, in that they would also be expected to make proportionate contributions towards the necessary transport mitigations.
- 2.1.20 It is also considered that the monitor and managing of the trip credits should be controlled by Medway Council and that the Council should be responsible for managing any reallocation credits as required through the monitoring process.
- 2.1.21 The Consortium also understands that different forms of development are expected to contribute towards transport mitigation commensurate with their impacts but would query why accessible locations are proposed to be exempt from any and all contributions. Accessible areas will have high levels of frequent public transport and

impacts in these areas could, for example, impose new associated service running costs or additional active travel infrastructure needs. Employees, residents and other users of current accessibly-located developments will still require connectivity to less accessible areas, particularly if future commercial development is encouraged in areas that are currently less accessible, such as the Hoo Peninsula.

- 2.1.22 The LP has the greatest chance of success if all stakeholders have an involvement in the expansion of the public transport and active travel networks in Medway, regardless of their current location. Exempting more accessible sites, and those below a certain scale/threshold, from contributing towards these transport improvements will therefore have viability implications for the remaining site allocations.

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

- 2.1.23 Policy DM18 and paragraph 9.11.8 state:

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

- 2.1.24 The Consortium notes and welcomes the commitment to an Area-Wide Travel Plan. Informed by the Sustainable Transport Strategy, the Consortium has led in the preparation of the Area-Wide Travel Plan, which can achieve the aspirations of the Consortium and Medway Council whilst ensuring that potential development can come forward as sustainably as possible. It is expected that this should become the Area-Wide Travel Plan noted in the policy, subject to agreement with Medway Council.
- 2.1.25 The Consortium’s Area-Wide Travel Plan is currently in preparation but a draft version has been included alongside these Representations at Appendix A. The Consortium would welcome further discussions with Medway Council on the Travel Plan, including how the Travel Plan can tie into the emerging proposals for BRT on the Peninsula.

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

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

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

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

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

- 2.1.29 The Consortium would suggest that these three policies could benefit from the inclusion of a line item, as Policies SA8 and SA9, to support improvement to BRT bus provision. Many of the sites covered by these policies will benefit from the availability of new and improved bus services, and funding of sustainable travel

measures should be prioritised over general highway infrastructure. It is noted that many of these sites will be captured under the need to fund highway mitigation.

## 2.2 Strategic Transport Assessment

- 2.2.1 PF has not undertaken a detailed technical review of the STA as part of the Regulation 19 review, as the STA has been undertaken in collaboration with Medway Council and National Highways, and it is expected that it has been subject to suitable technical scrutiny.
- 2.2.2 The major conclusion of the Regulation 19 STA is that even with the inclusion of achievable mode shift targets (Stage 1 and Stage 2 mode shift<sup>2</sup>, analogous to but less ambitious than the Sustainable Transport Strategy being promoted by the Consortium) through the delivery of BRT and LCWIP infrastructure, that significant highway capacity works will be required to mitigate the growth associated with the Local Plan. The STA recognises that there are existing issues and capacity constraints on the local network, in particular at junctions such as Four Elms Roundabout and M2 Junction 1, and that these will need mitigation in any case. The inherent need for mitigation is therefore not solely due to Local Plan development.
- 2.2.3 The STA presents a series of schemes along the A229/A228 corridor. To the north of the corridor, these are generally limited to minor schemes to improve entry capacity on one or more roundabout entry arms. However to the south at Four Elms Roundabout, Main Road Roundabout and Sans Pareil Roundabout, a series of major schemes have been presented.
- 2.2.4 Notwithstanding the limited optioneering presented in some of the appendices to the STA, the Consortium would expect that such significant schemes should be subject to an appropriate level of optioneering commensurate with a series of schemes that have been estimated by Medway Council to total in cost to £140 million<sup>3</sup>. It is not clear that this work has been undertaken beyond an initial modelling exercise. Whilst it is accepted that these are only concept designs, and therefore a number of the apparent design issues would likely be addressed as design emerges, the Local Plan is proposing a series of high cost schemes which developers are likely to be required to fund, which the initial presented evidence indicates may only just achieve the aims in traffic operation terms.
- 2.2.5 In all cases, the presented schemes are not associated with any related work establishing if they are deliverable. All three may require significant levels of third-party land, earthworks and environmental works, and it is not clear this has been costed for, or is deliverable.
- 2.2.6 Given that the burden of funding a significant proportion of these works is likely to fall to the Consortium, it is critical that this process has properly explored what is necessary and deliverable, what the options are to achieve the requirements, and whether the proposed level of mitigation is appropriate at all.
- 2.2.7 The modelling/forecast traffic basis for the proposals is based on 'unrestricted demand' after the mode share measures have been applied to trip generation in the strategic highway model. Whilst this is not a pure 'predict-and-provide' approach, it still follows many of these principles and does not consider that it may not be in the policy interest to mitigate the junctions to the level of fully satisfying forecast demand.
- 2.2.8 This is particularly relevant when it is noted that the work undertaken in the STA indicates (for example) that the M2, M2 Junction 1 and the western part of the A289 are still likely to be a constraint on the local network. As it is not proposed to mitigate those issues, there is a risk that the junctions in question may be over-mitigated with the proposed schemes, leading to a release of local travel demand by car, undermining the desired shift to active travel and public transport for local journeys.

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

<sup>3</sup> Mid-point estimate (IDP Table 14-1)

2.2.9 Overall, whilst the Consortium recognises the need for some level of local highway mitigation, the scale of the schemes proposed may be excessive and a more effective use of funding would be a more focussed targeting of mode shift through public transport and active travel interventions. This is likely to be more cost-effective and also more closely aligned with the Consortium and Medway’s Vision.

## 2.3 Infrastructure Delivery Plan

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

2.3.2 The Consortium also welcomes that the main part of the IDP states that funding for highway works is not exclusively expected to be funded through developer contributions (IDP Section 3.2). However the IDP does not appear to identify a credible source for funding for the BRT scheme to connect Strood and the Peninsula in the core document.

2.3.3 More generally, Appendix 1 of the IDP, despite noting many of the transport schemes as “critical” does not identify any funding for almost all the schemes required. The Appendix notes “Section 106” as the only potential funding source in almost all cases. Whilst it is accepted that there is work to do with taking schemes forward, costing and apportionment (see also STA Proportionality Assessment below), given the scale of the costs involved, it is exceptionally unlikely that the burden for these could fall solely to developers.

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

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

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

2.3.5 Medway Council’s estimates provide a total range for these strategic mitigations of between £107m and £177m. Third-party land costs, statutory undertaker/utility work and earthworks may also add significantly to these figures.

2.3.6 The Consortium has undertaken its own cost analysis, which indicates that significantly less funding is required to deliver the highway mitigation schemes proposed by Medway Council. If the cost assumptions were adjusted in line with the Consortium’s findings, it would reduce the financial burden on the LP’s viability and enhance confidence in the deliverability of the schemes.

- 2.3.7 The reduced cost estimates could also enable earlier implementation of the schemes within the Local Plan timeframe, requiring a lower build-out rate to support their delivery.
- 2.3.8 It is also noted that Medway Council has sought forward funding from the government to facilitate early delivery of the schemes, with a potential clawback mechanism through S106 contributions linked to new housing development to retrospectively cover the costs.
- 2.3.9 More generally, the above costs also exclude BRT infrastructure, which is likely to have a substantive cost much of which is likely to fall to developers, and also excludes any other local junction mitigations as might be required on a site-by-site basis. It is also worth noting that developers will have many other costs including affordable housing provision, education, health etc. and this is likely to weigh significantly against the viability of new developments on the Peninsula.
- 2.3.10 The IDP states at paragraph 2.8.4:  
*“Strategic Infrastructure – Infrastructure which will need to be funded by developers on a fair and equal basis which is proportionate to the development in question and **will not be subject to viability review.**”* [emphasis added]
- 2.3.11 Given this position, it is even more important that the scale of highway works is properly identified, justified and costed at this stage. This approach notwithstanding, it is unlikely that developers could (or should) bear the full cost of remediating the issues on the Medway network exclusively, particularly as some of the mitigation is required to address pre-existing issues. Any central government funding is likely to require more comprehensive justification than that presented in the STA/IDP to date.
- 2.3.12 The STA and IDP do not include for interim schemes at these junctions and given that contributions are expected to be proportionate to vehicle trips it is not clear, for example, what happens if:
- Strategic mitigation is still required but the Consortium (and others) have achieved significant trip rate reductions such that contributions do not adequately cover the proposed schemes.
  - Costs of the strategic mitigations escalate such that they are no longer fully funded, are not deliverable and block further development.
- 2.3.13 Furthermore, given that contributions would come alongside development, and that the need for the costliest mitigation is likely to be earlier in the Local Plan period, it is unclear how the schemes could come forward ahead of significant parts of their funding basis. A mechanism for forward funding of infrastructure needs to be established.
- 2.3.14 The Consortium is committed to working closely with Medway Council and considers that there is more to do on this matter.
- ## 2.4 Proportionality Assessment (July 2025; r2)
- 2.4.1 The Consortium welcomes the open process being presented by Medway as to the methodology for the apportionment of Local Plan costs. It is understood that this remains an item of active work and discussion and looks forward to engaging in more detail with Medway Council in the following months. As such, the following is at a necessarily high level.
- 2.4.2 At this time, the Proportionality Assessment presents a “Method 1” approach to proportionality which is (broadly) based on splitting costs for each junction based on each allocation’s respective contribution to traffic at the junction. This raises a number of issues:
- This method does not account for background growth on the network which is in part responsible for the need to mitigate some junctions.

- Four Elms Roundabout (the costliest mitigation) requires mitigation to remediate pre-existing issues regardless of Local Plan development coming forward. The potential expectation that developers bear the full cost of the scheme therefore does not meet the Community Infrastructure Levy Regulations 2010 Section 122(2) planning obligation tests.
- There is no account taken of the viability associated with the significant levels of costs this would impose on the developers.
- It is not clear how 'windfall' sites would contribute against this method.

2.4.3 As noted above, the costs for the proposed schemes are significant and even small proportions of these costs may make sites unviable, threatening the deliverability of the Local Plan. The assessment also does not consider the cost of the BRT provision, which should be a primary focus for transport infrastructure funding.

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

## 2.5 M2 Motorway

2.5.1 The STA includes a review of the implications of the Local Plan on the Strategic Road Network (A2/M2) through a number of reports including:

- M2 Junction Analysis Technical Note
- M2 and M20 Merge and Diverge Analysis

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

2.5.3 It appears that further analytical work will be required. Among immediate issues the analysed future layout appears to be based on a design supporting the Uniper/MedwayOne site from some years ago, which we note, is superseded (in part) by the design of the Lower Thames Crossing (LTC) scheme in this area.

2.5.4 For example, the merge/diverge analysis indicates that a minor improvement to the lane gain is required heading towards the south on the M2. However, once the LTC scheme is implemented will no longer be present as there will be 4 running lanes through M2 J1. The work will therefore require updating to reflect the, now consented, LTC scheme.

2.5.5 As no mitigation is proposed for M2 J1, no costing has been undertaken. Given the above, works may be required and these would have costs associated. This will impact viability for the Local Plan as a whole and remains an item that the Consortium would like to see explored further. However, it is acknowledged that this is a cross-boundary issue and that funding will be sought from a number of sources which may include central government and / or other developments within the jurisdiction of other neighbouring Local Authorities.

2.5.6 We understand Medway Council has commissioned further work on some of these matters and look forward to engaging on these in due course with all appropriate Stakeholders.

## 3 Conclusion

### 3.1 Background

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

- 3.1.2 The Consortium has been working in collaboration with Medway for an extended period of time both to deliver development, and to provide sites in support of the Local Plan, assisting Medway in achieving its goals for sustainable growth. To that end, the Consortium is leading on a programme of sustainable transport strategy planning, and area-wide travel planning, with the expectation that this will feed into the Local Plan going forward.
- 3.1.3 Medway Council have developed a new LP to provide the framework to guide the development and use of land in Medway up until 2041 and released the revised evidence base and LP for Regulation 19 consultation in June 2025. This TN summarises the representations of the Consortium with regard to the transport aspects of the LP.

## 3.2 Summary

- 3.2.1 The Consortium welcomes the 2041 Vision for Medway and its focus on public transport and active travel as a basis for sustainable growth in the area. The potential BRT scheme to deliver a 'step-change' in bus provision on the Peninsula and for connectivity to Strood will be key to achieving this vision. The Consortium looks forward to working with Medway to further develop these proposals to ensure they are both deliverable and successful.
- 3.2.2 The Consortium's demonstrated record of taking a place-based vision approach to the Peninsula is aligned with Medway's LP approach and the incorporation of the Consortium's proposed vehicle trip budget approach is welcomed. There is more work to do on this and the Consortium expects to work with Medway on incorporating this into the Area-Wide Travel Plan and establishing the practical methodology of this going forward.
- 3.2.3 The Strategic Transport Assessment identifies some existing and forecast highway capacity constraints relating to the Peninsula which will need to be addressed, even in light of the vision-led approach. Medway have proposed mitigation schemes, some exceptionally large, but these are not supported by a clear optioneering process commensurate with scale.
- 3.2.4 Additionally, the deliverability of the schemes is unclear (particularly at Four Elms Roundabout) and this is a risk. Costing has been undertaken and has resulted in some very high estimates which are higher than the independent cost analysis undertaken by the Consortium. The LP, Infrastructure Delivery Plan and a Proportionality Assessment imply that there is an expectation that developers could bear the full value of the highway proposals. The Consortium considers this is not likely to be realistically viable, and also does not account for the other key items which developers must contribute, e.g. to the proposed BRT scheme which must be a priority.
- 3.2.5 An initial methodology for cost apportionment has been proposed by Medway Council but it seems unlikely that this will achieve its aims and enable development, therefore the Consortium looks forward to further discussion with Medway Council on the determination of a second methodology which accounts for viability.
- 3.2.6 Medway Council has undertaken some highway assessment work of the M2 and in particular M2 Junction 1 as a part of the LP Evidence Base. There remain some outstanding issues, and the LP does not propose improvements to M2 J1 or apportion costs to do so. The Consortium looks forward to further discussion with Medway Council and all relevant Stakeholders on this matter.

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

<b>Report Ref.</b>		109345-PEF-XX-XX-TN-TR-004002				
<b>File Path</b>		P:\101093-10109345 - 2024 Hoo Sustainable Transport Strategy\01 - WIP\Documents\2025-07 - Medway LP Reg 19\109345-PEF-XX-XX-TN-TR-004002 - Medway LP R19 Consortium Reprs - r2.docx				
Rev	Suit	Description	Date	Originator	Checker	Approver
P01	S3	Initial issue	31-Jul-2025	CJO	PDS	PDS
P02	S3	Updated to comments	7-Aug-2025	CJO	DW	PDS
P03	S3	Updated to comments	11-Aug-2025	CJO	DW	PDS
P04	S3	Final	11-Aug-2025	CJO	DW	PDS
Ref. reference. Rev revision. Suit suitability.						

Appendix A Draft Area-Wide Travel Plan

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

Land at the Hoo Peninsula

Area Wide Travel Plan

August 2025

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

<b>Report Ref.</b>	109345-PEF-XX-XX-T.RP-H-000001					
<b>File Path</b>	\\Rsbguks01\lonengineering\101093--10109345 - 2024 Hoo Sustainable Transport Strategy\01 - WIP\Documents\109345-XX-XX-RP-TR-000005 Area Wide Travel Plan\109345-XX-XX-RP-TR-000005 Area Wide Travel Plan.docx					
<b>Rev</b>	<b>Suit</b>	<b>Description</b>	<b>Date</b>	<b>Originator</b>	<b>Checker</b>	<b>Approver</b>
D01		Initial	06-08-2025	GR	DW	PS
D01		Initial	11-08-2025	GR	DW	PS

Ref. reference. Rev revision. Suit suitability.

**Prepared for**

Hoo Consortium

**Prepared by**

**Pell Frischmann**  
5<sup>th</sup> Floor, 85 Strand  
London  
WC2R 0DW

**Pell Frischmann**

# Contents

Executive summary	
1. Introduction	1
1.2. Location and Description	1
1.3. Hoo Peninsula Sustainable Transport Strategy	2
1.4. Scope of Work	2
1.5. Report Scope and Structure	3
2. Policy Context	4
2.2. National Policy	4
2.3. Regional Policy	8
2.4. Local Policy	9
3. Travel Plans: An Overview	12
3.1. General	12
3.2. Planning Submission	12
3.3. Post Determination	13
4. Travel Plan Development Thresholds	14
4.2. Residential	14
4.3. Commercial and Retail	14
4.4. Schools	15
5. Travel Plan Aims, Objectives and Targets	16
5.2. Place-Based Vision for the Hoo Peninsula	16
5.3. Travel Plan Aims	16
5.4. Travel Plan Objectives	16
5.5. Travel Plan Targets	17
6. Travel Plan Content	19
6.1. Essential Content	19
6.2. Travel Plan Management	19
7. Travel Plan Measures	20
7.2. Physical Measures	20
7.3. Soft Measures	21
7.4. Action Plan	21
8. Travel Plan Management, Implementation and Enforcement	22
8.1. Monitoring and Review	22
8.2. Reporting	22
8.3. Enforcement	22
9. Conclusion	23

## Figures

Figure 1.1: Strategic Local Map	2
---------------------------------	---

## Tables

Table 4-1 Commercial Threshold	14
--------------------------------	----

**Appendices**

Appendix A: Hoo Peninsula Sustainable Transport Strategy

## 1. Introduction

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

## 1.2. Location and Description

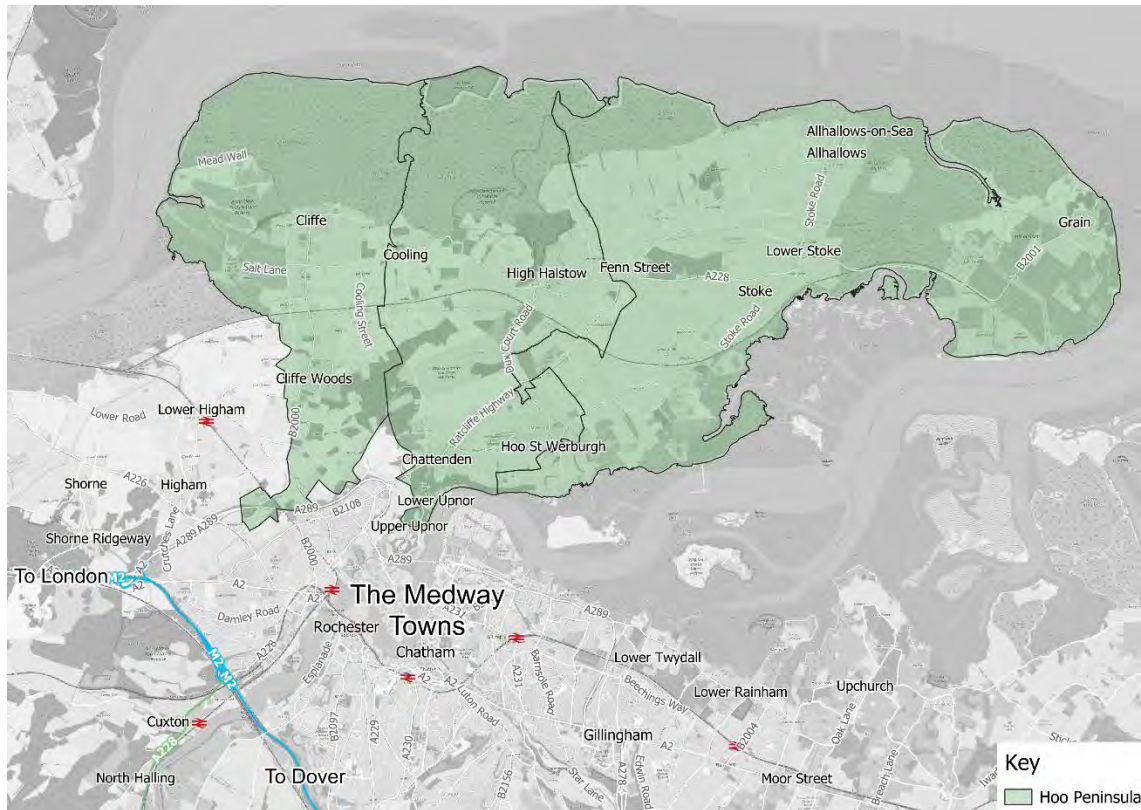
### 1.2.2. Medway

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

### 1.2.3. Hoo Peninsula

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

Figure 1.1: Strategic Location Map



Source: OpenStreetMap contributors with Pell Frischmann annotations

### 1.3. Hoo Peninsula Sustainable Transport Strategy

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

### 1.4. Scope of Work

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

## 1.5. Report Scope and Structure

1.5.1. This report is structured as follows:

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

## 2. Policy Context

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

### National Policy

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

### Regional Policy

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

### Local Policy

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

## 2.2. National Policy

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

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

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

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

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

“It should be ensured that:

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

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

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

2.2.8. Within this context, paragraph 117 notes that

“Applications for development should:

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

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

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

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

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

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

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

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

2.2.13. This document states at Paragraph 12 that:

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

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

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

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

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

2.2.16. And at Paragraph 50:

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

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

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

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

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

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

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

### **Local Transport Note 1/20 Cycle Infrastructure (2020)**

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

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

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

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

2.2.26. In addition to this, paragraph 14.1.2 states:

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

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

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

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

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

## 2.3. Regional Policy

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

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

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

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

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

## 2.4. Local Policy

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

- 2.4.1. MC is producing a new LP covering Medway up until 2041. This sets out a vision for future development in the Medway towns and the Hoo Peninsula, ensuring that the needs of the area are met through a number of policies and proposals. This new LP will replace the existing 2003 Local Plan. Hoo Parish Council will continue to make representations at the various stages of the LP's development.
- 2.4.2. There are various potential impacts of the emerging LP for residents on the Hoo Peninsula, as outlined on Medway Council's website<sup>1</sup>:
- New Community facilities providing social clubs and activities
  - Improved and updated sports facilities in Hoo
  - Improved transport services for better access around the Peninsula and into other areas in Medway
  - Maintaining the local heritage of the Peninsula, including creating access to green spaces for walking and cycling
  - More options for high quality houses on the Peninsula.
- 2.4.3. Improving the transport connectivity of Medway is a key opportunity, acting as a catalyst for future local development, growth and improved living standards.

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

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

---

<sup>1</sup> [https://www.medway.gov.uk/info/200542/medway\\_local\\_plan\\_2040/1825/what\\_the\\_local\\_plan\\_means\\_for\\_residents](https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1825/what_the_local_plan_means_for_residents)  
(last accessed 04/07/2024)

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

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

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

2. Parking provision for development should include:

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

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

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

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

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

#### **Medway Rights of Way Improvement Plan (MC, 2020)**

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

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

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

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

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

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

### **Other Emerging Documents**

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

## 3. Travel Plans: An Overview

### 3.1. General

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

#### **Policy Compliance**

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

### 3.2. Planning Submission

#### **Pre-Application / Scoping**

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

#### **Planning Application Submission**

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

### 3.3. Post Determination

#### Occupation

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

#### Monitor, Review and Enforcement

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

#### Travel Plan Working Groups

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

## 4. Travel Plan Development Thresholds

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

### 4.2. Residential

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

### 4.3. Commercial and Retail

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

**Table 4-1 Commercial Threshold**

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

\*sqm relates to Gross Floor Area

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

## 4.4. Schools

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

## 5. Travel Plan Aims, Objectives and Targets

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

## 5.2. Place-Based Vision for the Hoo Peninsula

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

### THE CORE VISION

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

## 5.3. Travel Plan Aims

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

## 5.4. Travel Plan Objectives

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

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

## 5.5. Travel Plan Targets

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

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

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

### 5.5.2. Action Targets

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

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

### 5.5.3. Aim Targets

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

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

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

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

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

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

## 6. Travel Plan Content

### 6.1. Essential Content

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

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

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

### 6.2. Travel Plan Management

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

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

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

## 7. Travel Plan Measures

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

## 7.2. Physical Measures

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

## 7.3. Soft Measures

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

## 7.4. Action Plan

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

## 8. Travel Plan Management, Implementation and Enforcement

### 8.1. Monitoring and Review

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

### 8.2. Reporting

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

### 8.3. Enforcement

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

## 9. Conclusion

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

## Appendix A: Hoo Peninsula Sustainable Transport Strategy

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

Land at the Hoo Peninsula

Sustainable Transport Strategy

August 2025

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

<b>Report Ref.</b>	109345-PEF-XX-XX-RP-TR-000003					
<b>File Path</b>	\\Rsbguks01\lonengineering\101093--10109345 - 2024 Hoo Sustainable Transport Strategy\01 - WIP\Documents\109345-XX-XX-RP-TR-000003 STS\109345-XX-XX-RP-TR-000003 Sustainable Transport Strategy.docx					
<b>Rev</b>	<b>Suit</b>	<b>Description</b>	<b>Date</b>	<b>Originator</b>	<b>Checker</b>	<b>Approver</b>
1	D	For Review	10/07/25	GR	DW	PS
2	D	Draft Submission	08/08/25	GR	DW	PS

Ref. reference. Rev revision. Suit suitability.

**Prepared for**

Hoo Consortium

**Prepared by**

Pell Frischmann

First Floor  
55 Baker Street  
London  
W1U 8EW

Pell Frischmann

# Contents

Executive summary	
1. Introduction	1
1.2. Location and Description	1
1.3. Previous Work to Date	2
1.4. Report Scope and Structure	2
2. Policy Review	4
2.1. Introduction	4
2.2. National Policy	4
2.3. Regional Policy	8
2.4. Local Policy	11
2.5. Policy Summary	13
3. Baseline Transport Conditions	14
3.2. Existing Highway Network	14
3.3. Active Travel Infrastructure	15
3.4. Existing Bus Network	17
3.5. Existing Rail Network	24
3.6. Emerging Transport Improvements	27
3.7. Baseline Conditions Summary	28
4. Place-Based Vision for the Hoo Peninsula	30
4.2. Strategic Transport Objectives	30
4.3. Sustainable Transport Principles	31
5. Sustainable Transport Modelling – Baseline	35
5.2. Overview of Methodology	35
5.3. Development Quantum	36
5.4. Trip Generation	36
5.5. Baseline Multi-Modal Trip Generation	39
5.6. Baseline Mode Share Summary	44
6. Sustainable Transport Strategies	45
6.2. Place-making	45
6.3. Active Travel Improvements	49
6.4. Bus Strategy	52
6.5. Sustainable Transport Interventions Summary	56
7. Sustainable Transport Modelling – Fulfilled Vision	57
7.2. Sustainable Mode Share	57
7.3. Sustainable Mode Share Summary	58
8. Realised Vision for the Hoo Peninsula	59
8.2. Daily Life on the Hoo Peninsula	59
8.3. Resulting Public Transport Provision	59
8.4. Highway Network Impacts	61
9. Summary and Conclusions	62

## Figures

Figure 1.1: Strategic Local Map.....	2
Figure 2.1: Proposed Policy Outcomes, KCC Draft Local Plan.....	9
Figure 3.1: Highway Network Map .....	15
Figure 3.2: Existing PROW Network .....	16
Figure 3.3: Existing Cycle Infrastructure.....	17
Figure 3.4: Existing Bus Network - Hoo Peninsula.....	18
Figure 3.5: Existing Bus Network - Medway Region (Arriva) .....	20
Figure 3.6: Existing Bus Network – North East Kent (Arriva).....	22
Figure 3.7: Local Rail Network .....	24
Figure 4.1: Street User Hierarchy .....	31
Figure 4.2: Features of a 20-minute Neighbourhood .....	33
Figure 5.1: Overview of Methodology .....	36
Figure 5.2: Local Plan Preferred Sites by MSOA .....	40
Figure 6.1: MaaS Framework .....	46
Figure 6.2: Components of mobility hubs .....	47
Figure 6.3: 2km Walking Isochrones with Underlying AM Peak Employment Choropleth .....	49
Figure 6.4: 2km Walking Isochrones with Underlying AM Peak Employment Choropleth .....	50
Figure 6.5: 5km Cycle Isochrones with Underlying AM Peak Residential Choropleth .....	51
Figure 6.6: 5km Cycle Isochrones with Underlying AM Peak Employment Choropleth.....	51
Figure 6.7: Proposed BRT Route .....	52
Figure 6.8: Cambridge BRT.....	53
Figure 6.9: Cambridge BRT Stop .....	53
Figure 6.10: AM Residential Trips from Site.....	54
Figure 6.11: AM Employment Trips to Site.....	54
Figure 6.12: Suggested Bus Routes.....	55
Figure 6.13: Arriva Route 191 .....	55
Figure 8.1: AM Peak Hour Bus Requirements .....	60
Figure 8.2: PM Peak Hour Bus Requirements .....	61
Figure 7.1: AM Residential Trips to Site Choropleth .....	64
Figure 7.2: AM Residential Trips from Site Choropleth .....	64
Figure 7.3: PM Residential Trips to Site Choropleth .....	65
Figure 7.4: PM Residential Trips from Site Choropleth .....	65
Figure 7.5: AM Employment Trips to Site Choropleth .....	66
Figure 7.6: AM Employment Trips from Site Choropleth.....	66
Figure 7.7: PM Employment Trips to Site Choropleth .....	67
Figure 7.8: PM Employment Trips from Site Choropleth.....	67

## Tables

Table 3.1: Existing Bus Services from the Isle of Grain and Hoo Peninsula.....	18
Table 3.2: Hoo Peninsula Bus Services Origin-Destination Summary.....	19
Table 3.3: Existing Medway Bus Services.....	20
Table 3.4: Medway BSIP Satisfaction .....	21
Table 3.5: Discovery Ticket Pricing (2024).....	23
Table 3.6: Summary of direct railway services from Strood .....	24
Table 3.7: Summary of direct railway services from Ebbsfleet International Station .....	25

Table 3.8: Summary of direct railway services from Gravesend Railway Station .....	25
Table 3.9: Summary of direct railway services from Northfleet Railway Station .....	26
Table 3.10: Summary of direct railway services from Rochester Station .....	27
Table 3.11: Summary of direct railway services from Higham Station .....	27
Table 5.1: Preferred Sites Development Quantum (April 2024) .....	36
Table 5.2: Total Vehicle Trip Rates by Land Use on the Hoo Peninsula (Extracted from the MTMFR) .....	37
Table 5.3: Total Vehicle Trip Generation .....	38
Table 5.4: Total People Trip Rates by Land Use on the Hoo Peninsula .....	39
Table 5.5: Total People Trip Generation .....	39
Table 5.6: Method of Travel to Work Census Data 2011 (ONS) .....	40
Table 5.7: Method of Travel to Work 2021 Census Data (ONS) .....	41
Table 5.8: Residential - Modal Share Summary .....	43
Table 5.9: B8 Storage or Distribution - Modal Share Summary .....	43
Table 5.10: B1 Office - Modal Share Summary .....	44
Table 5.11: B2 Industrial and Mixed B/E - Modal Share Summary .....	44
Table 6.1: Suggested acceptable walking distances .....	48
Table 7.1: Anticipated AM Mode Share following Strategic Transport Interventions .....	57
Table 7.2: Anticipated PM Mode Share following Strategic Transport Interventions .....	58
Table 8.1: Minimum Bus Requirements .....	60

## Appendices

Appendix A - Multi-Modal TRICS Data

Appendix B - Geospatial Analysis

## 1. Introduction

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

## 1.2. Location and Description

### 1.2.2. Medway

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

### 1.2.3. Hoo Peninsula

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

Figure 1.1: Strategic Local Map



Source: OpenStreetMap contributors with Pell Frischmann annotations

### 1.3. Previous Work to Date

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

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

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

### 1.4. Report Scope and Structure

1.4.1. The report is structured as follows:

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

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

## 2. Policy Review

### 2.1. Introduction

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

#### **National Policy**

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

#### **Regional Policy**

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

#### **Local Policy**

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

### 2.2. National Policy

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

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

- Economic objectives
- Social objectives
- Environmental objectives

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

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

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

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

“It should be ensured that:

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

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

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

2.2.8. Within this context, paragraph 117 notes that

“Applications for development should:

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

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

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

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

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

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

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

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

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

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

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

### **Local Transport Note 1/20 Cycle Infrastructure (2020)**

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

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

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

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

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

2.2.26. In addition to this, paragraph 14.1.2 states:

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

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

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

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

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

## 2.3. Regional Policy

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

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

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

Figure 2.1: Proposed Policy Outcomes, KCC Draft Local Plan



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

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

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

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

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

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

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

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

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

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

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

### **Kent Active Travel Strategy (KCC, 2016)**

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

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

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

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

“Action 1: Integrate active travel into planning

Action 2: Provide and maintain appropriate routes for active travel

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

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

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

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

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

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

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

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

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

## 2.4. Local Policy

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

2.4.1. MC is producing a new LP covering Medway up until 2041. This sets out a vision for future development in the Medway towns and the Hoo Peninsula, ensuring that the needs of the area are met through a number of policies and proposals. This new LP will replace the existing 2003 Local Plan. Hoo Parish Council will continue to make representations at the various stages of the LP’s development.

2.4.2. There are various potential impacts of the emerging LP for residents on the Hoo Peninsula, as outlined on Medway Council’s website<sup>1</sup>:

- New Community facilities providing social clubs and activities
- Improved and updated sports facilities in Hoo
- Improved transport services for better access around the Peninsula and into other areas in Medway
- Maintaining the local heritage of the Peninsula, including creating access to green spaces for walking and cycling

---

<sup>1</sup> [https://www.medway.gov.uk/info/200542/medway\\_local\\_plan\\_2040/1825/what\\_the\\_local\\_plan\\_means\\_for\\_residents](https://www.medway.gov.uk/info/200542/medway_local_plan_2040/1825/what_the_local_plan_means_for_residents)  
(last accessed 04/07/2024)

- More options for high quality houses on the Peninsula.

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

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

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

2.4.5. Paragraph 1.1 states the purpose of the NP:

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

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

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

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

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

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

2. Parking provision for development should include:

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

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

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

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

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

### **Medway Rights of Way Improvement Plan (MC, 2020)**

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

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

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

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

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

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

### **Other Emerging Documents**

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

## **2.5. Policy Summary**

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

### 3. Baseline Transport Conditions

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

#### 3.2. Existing Highway Network

##### 3.2.2. Local Routes

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

3.2.1. This is the primary route between the Hoo Peninsula and wider Medway. It is a dual carriageway with two lanes in each direction connecting the Hoo St Werburgh and Chattenden to the northeast with Wainscott and Strood to the south. This is a common route used by HGVs and local buses accessing the Hoo Peninsula.

3.2.2. Four Elms Hill is connected to Wulfere Way and Hasted Road at the Four Elms Roundabout. This is an unsignalised roundabout of ICD 80m; it is known to be congested during peak hours.

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

3.2.3. Located to the northeast of Hoo St Weburgh, this is primary local traffic route which connects into Peninsula Way via a roundabout with Ropers Lane and Ratcliffe Highway. At this point, the A228 transitions from a dual carriageway to the west into a single carriageway to the east. During this extent, the A228 has a wide single carriageway with speed limit varying between national and 40mph.

3.2.4. A series of roundabouts connect this route with the local villages of Sharnal Street, High Halstow, Fenn Street, Middle Stoke and the Isle of Grain.

###### **A289 (Hasted Road / Wulfere Way)**

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

##### 3.2.3. Strategic Road Network (SRN)

###### **M2**

3.2.6. The M2 originates 6km to the southwest of the Hoo Peninsula. The M2 is a national route connecting the Medway region southwest to Faversham and Canterbury (via the A2).

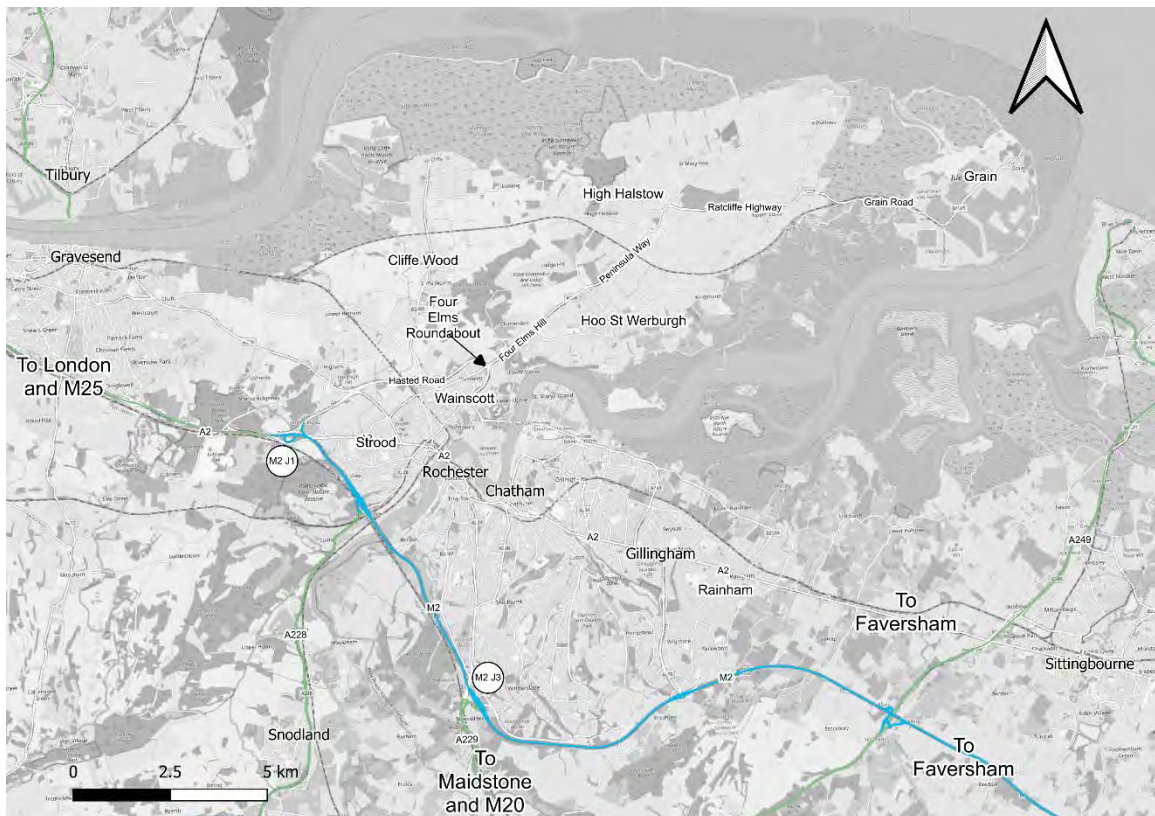
3.2.7. M2 J3 connects to the A229 at the Taddington Roundabout, which in turn serves Maidstone and leads to the M20 towards Ashford, Folkestone and Dover (via the A20).

###### **A2**

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

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

Figure 3.1: Highway Network Map



Source: OpenStreetMap contributors with Pell Frischmann annotations

### 3.3. Active Travel Infrastructure

#### 3.3.4. Public Rights of Way

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

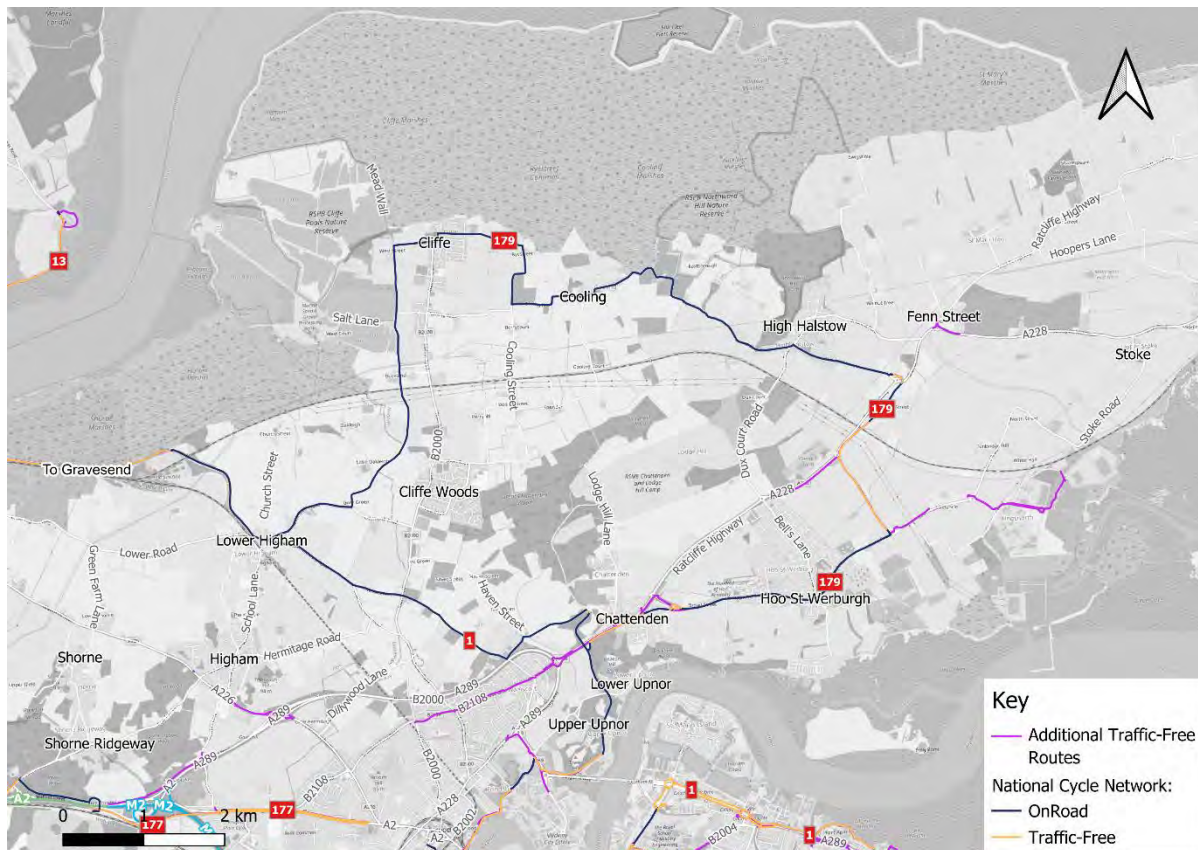
Figure 3.2: Existing PROW Network



### 3.3.5. Cycling Infrastructure

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

Figure 3.3: Existing Cycle Infrastructure



Source: OpenStreetMap with Pell Frischmann annotations

### 3.4. Existing Bus Network

#### 3.4.6. Isle of Grain and Hoo Peninsula

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

Figure 3.4: Existing Bus Network - Hoo Peninsula



Source: Medway Council

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

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

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

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

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

**Table 3.2: Hoo Peninsula Bus Services Origin-Destination Summary**

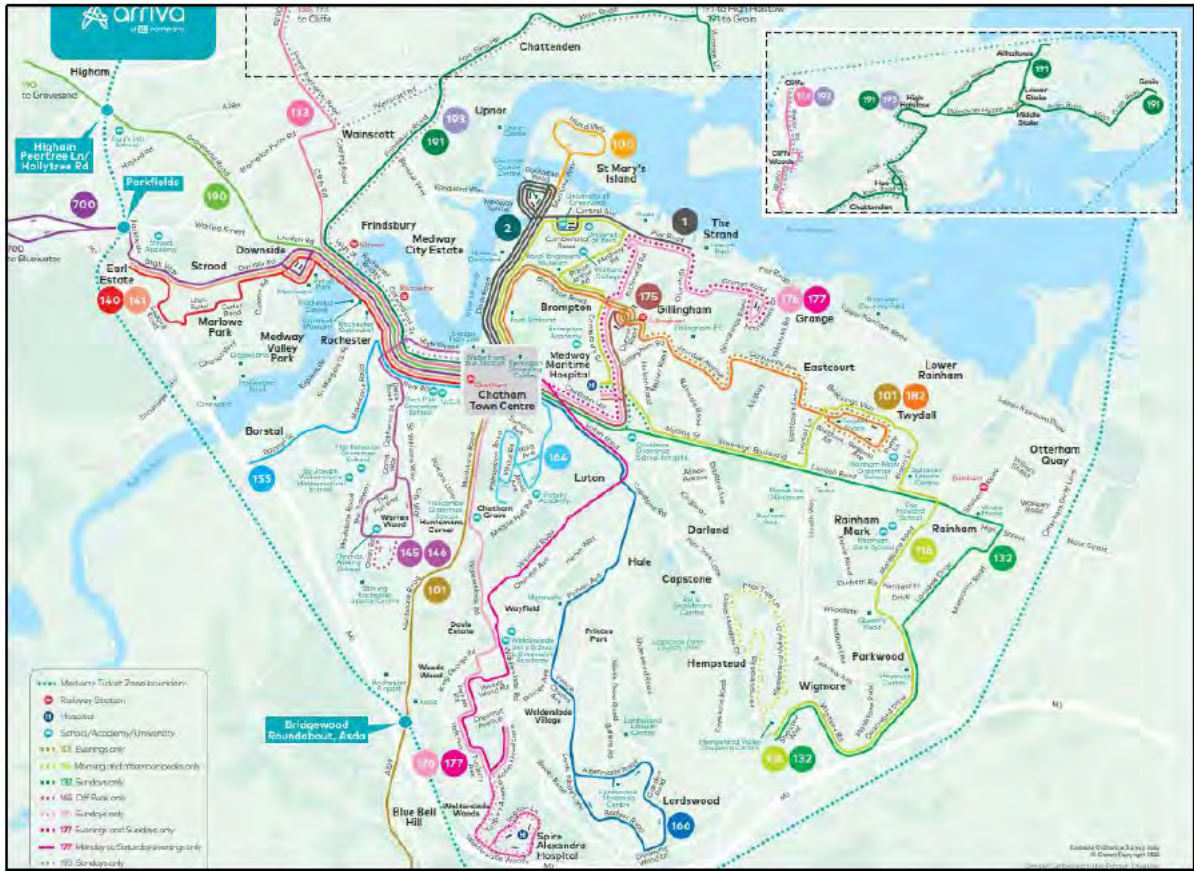
Origin	Destination	Total Number of Services	First/Last Service	Peak Journey Time
Grain	Strood, Rochester and Chatham	12 (Mon-Fri)	06:18/18:39 (Mon-Fri)	73 minutes (Strood)
		11 (Sat)	08:05/18:30 (Sat)	77 minutes (Rochester)
		5 (Sun)	08:30/16:50 (Sun)	84 minutes (Chatham)
Hoo St Werburgh	Strood, Rochester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

Source: Traveline (January 2025)

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

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

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



Source: Arriva Kent and Surrey (2024)

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

Table 3.3: Existing Medway Bus Services

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

Higham	Chatham, Cliffe, Gravesend, London, Strood, Rochester	111, 133, 190, 193, 311, 417, 736
--------	---	-----------------------------------

Source: Traveline (January 2025)

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

**Table 3.4: Medway BSIP Satisfaction**

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

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

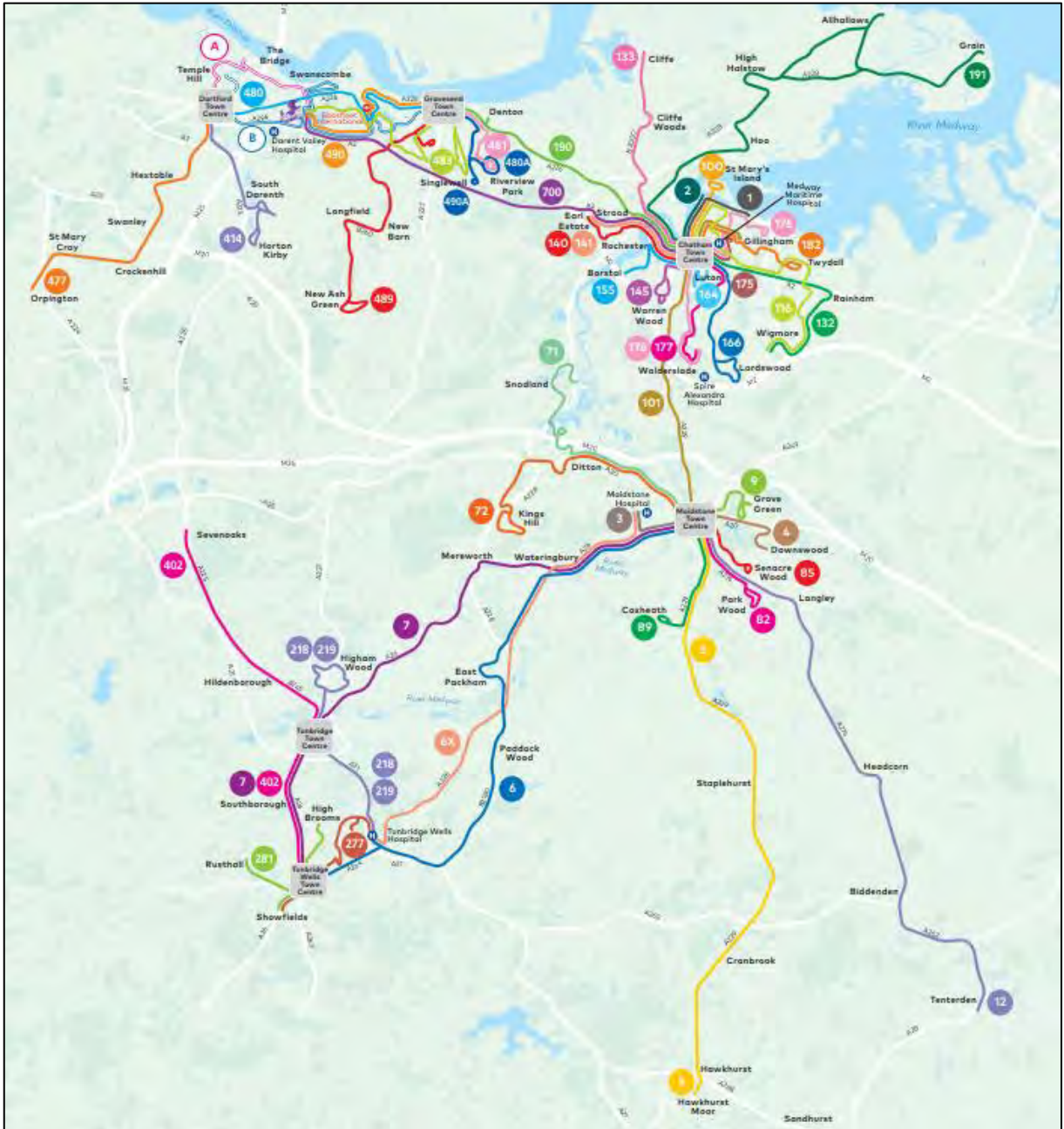
- 3.4.13. Bus priority lanes provide a fast connection on the A2 between Chatham and Bridgewater Shopping Centre, Ebbsfleet, served by Route 700. Within Medway, there are currently seven bus priority lanes:

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

### 3.4.8. Regional Bus Connections

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

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



Source: Arriva Kent and Surrey (2024)

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

### Dartford, Ebbsfleet and Gravesend

3.4.16. Dartford, Ebbsfleet and Gravesend are primarily served by the Arriva network. These towns are large employment centres with frequent and reliable onward connections to London by road and rail, including by High Speed 1. Located to the west of the Hoo Peninsula, there currently exists no direct connection between Dartford or Ebbsfleet and the Hoo Peninsula, with the limited 417 route providing an infrequent service from Cliffe to Gravesend.

3.4.17. Gravesend is a primary multi-modal transport interchange point. The Gravesend Bus Hub at Barrack Row, opened in 2022, integrates bus and rail facilities, including the half hourly High Speed 1 services to London St Pancras. Bus 190 is the primary route from Medway to Gravesend providing a thrice hourly peak time service from Chatham Waterfront to Gravesend Barrack Row via Rochester Railway

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

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

### Maidstone, Tonbridge and Tunbridge Wells

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

### Discovery Bus Ticket

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

**Table 3.5: Discovery Ticket Pricing (2024)**

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

Source: Metrobus (January 2025)

### 3.4.9. Fastrack Services

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

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

### 3.5. Existing Rail Network

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

Figure 3.7: Local Rail Network



Source: OpenStreetMap contributors with Pell Frischmann annotations

#### 3.5.10. Stood Railway Station

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

Table 3.6: Summary of direct railway services from Stood

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

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

Source: National Rail Enquiries (July 2024)

### 3.5.11. Ebbsfleet International Station

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

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

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

Source: National Rail Enquiries (July 2024)

### 3.5.12. Gravesend Railway Station

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

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

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

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

Source: National Rail Enquiries (July 2024)

### 3.5.13. Northfleet Railway Station

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

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

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

Source: National Rail Enquiries (July 2024)

### 3.5.14. Rochester Railway Station

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

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

**Table 3.10: Summary of direct railway services from Rochester Station**

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

Source: National Rail Enquiries (July 2024)

### 3.5.15. Higham Railway Station

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

**Table 3.11: Summary of direct railway services from Higham Station**

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

Source: National Rail Enquiries (July 2024)

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

## 3.6. Emerging Transport Improvements

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

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

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

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

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

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

## 3.7. Baseline Conditions Summary

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

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

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

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

## 4. Place-Based Vision for the Hoo Peninsula

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

### THE CORE VISION

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

## 4.2. Strategic Transport Objectives

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

## 4.3. Sustainable Transport Principles

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

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

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

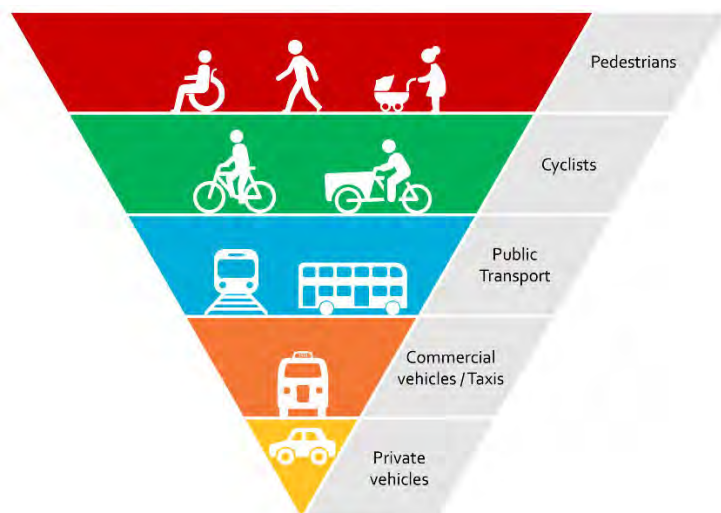
### 4.3.2. Street User Hierarchy

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

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

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

**Figure 4.1: Street User Hierarchy**



Source: Surrey Design Code – Create Streets

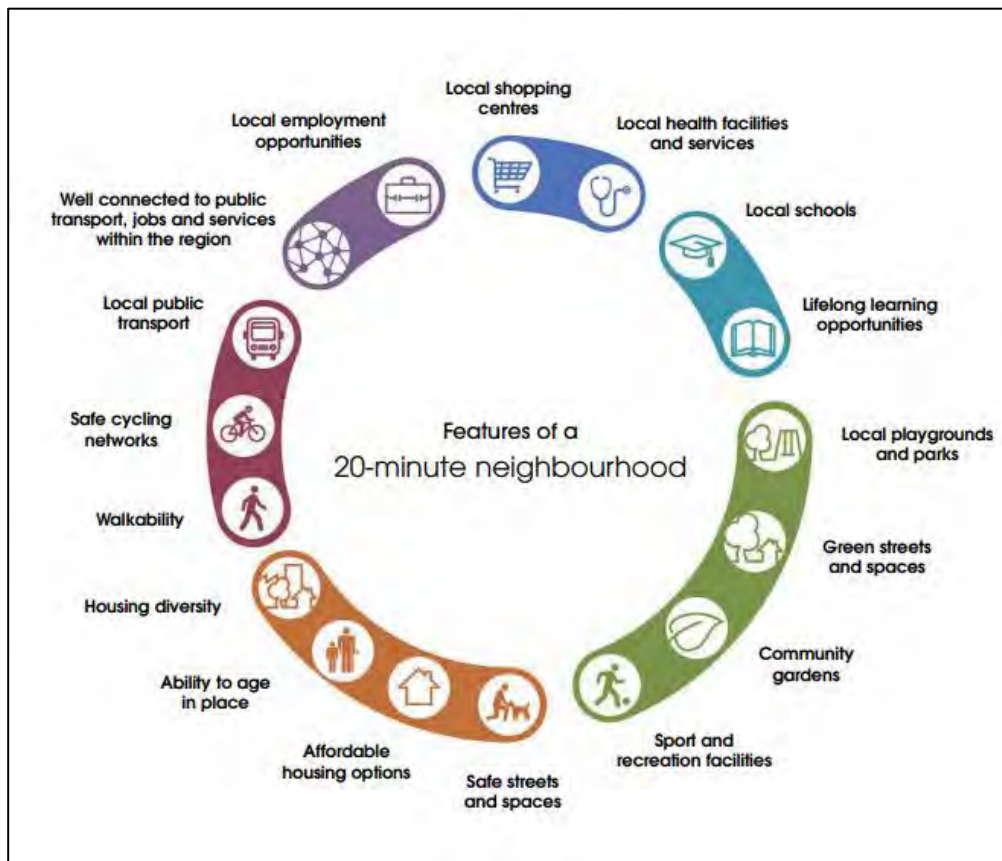
4.3.6. A development, depending on its scale and the context, will require a range of streets and spaces with differing characteristics. Planning applications require a Design and Access Statement to be submitted and this should show how street design has been considered in the context of user hierarchy.

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

### 4.3.3. Accessibility to Goods and Services

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

Figure 4.2: Features of a 20-minute Neighbourhood



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

#### 4.3.4. Self-Sufficient Place-Making

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

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

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

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

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

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

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

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

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

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

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

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

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

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

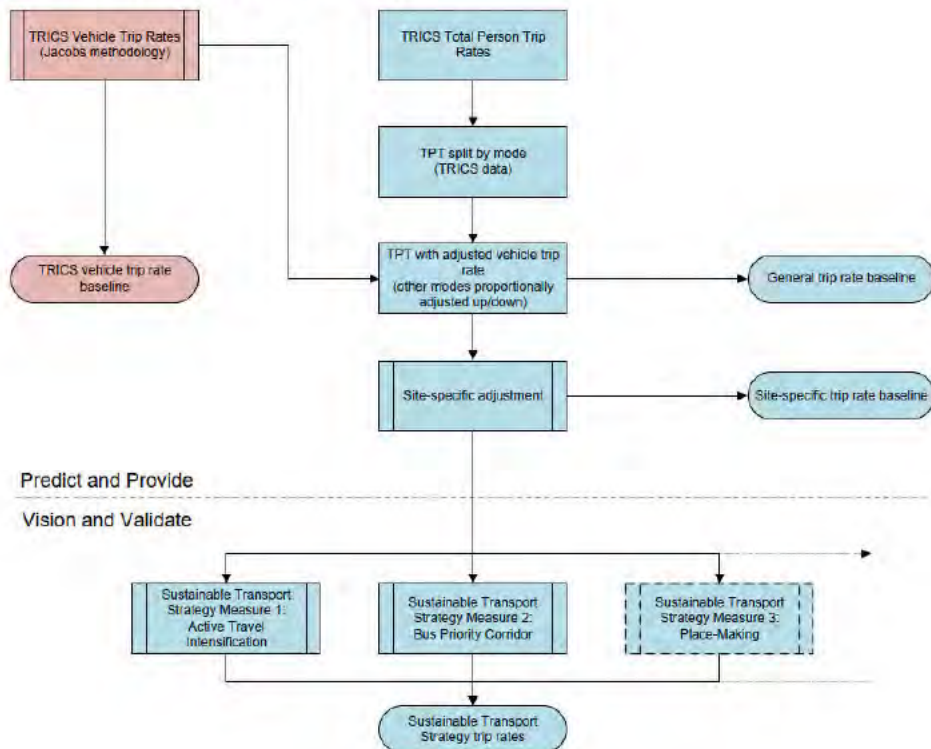
## 5. Sustainable Transport Modelling – Baseline

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

### 5.2. Overview of Methodology

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

Figure 5.1: Overview of Methodology



### 5.3. Development Quantum

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

Table 5.1: Preferred Sites Development Quantum (April 2024)

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

### 5.4. Trip Generation

#### 5.4.1. Baseline Vehicle Trip Generation

5.4.1. The July 2024 MTMFR details the expected AM and PM peak vehicle trip generation for different modelling scenarios as previously outlined; this methodology is summarised below.

5.4.2. Peak hour vehicle trip rates for developments are based on consented trip rates where available. Where these are not available, trip rates are calculated using TRICS v7.10.2. Each development is assigned a TRICS land use (e.g. 03 Residential Houses Privately Owned, 02 Employment Office) and land type (e.g. Suburban, Town Centre) based on the proposed land use and the geographic location

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

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

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

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

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

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

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

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

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

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

**Table 5.3: Total Vehicle Trip Generation**

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

Source: Pell Frischmann calculations based on MTMFR data

#### 5.4.2. Baseline Total Person Trip Generation

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

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

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

Source: Pell Frischmann

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

**Table 5.5: Total People Trip Generation**

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

Source: Pell Frischmann calculations

## 5.5. Baseline Multi-Modal Trip Generation

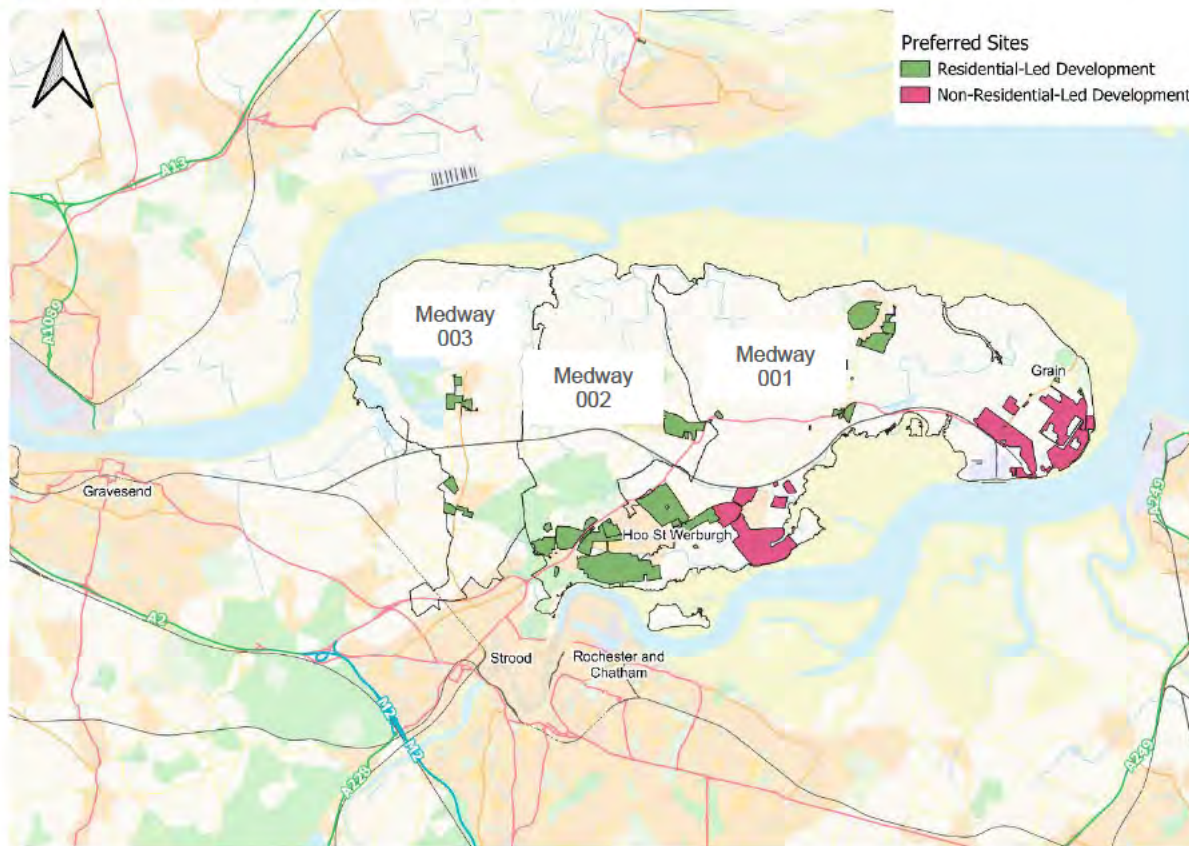
- 5.5.1. Using the total person trip rates from TRICS, a modal share can be derived and understood. There are two common, industry-standard ways to derive a mode share: using census data; and using TRICS-derived rates. Both methods are outlined, however it has been reasoned that using a TRICS-derived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

### 5.5.3. Census-derived Mode Share

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

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

**Figure 5.2: Local Plan Preferred Sites by MSOA**



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

### 2011 Census Data

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

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

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

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

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

Note: Numbers may not sum due to rounding

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

### 2021 Census Data

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

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

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

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

Note: Numbers may not sum due to rounding

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

### Limitations of Census Data

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

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

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

#### 5.5.4. TRICS-derived Mode Share

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

**Table 5.8: Residential - Modal Share Summary**

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

Pell Frischmann calculations

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

**Table 5.9: B8 Storage or Distribution - Modal Share Summary**

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

Pell Frischmann calculations

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

**Table 5.10: B1 Office - Modal Share Summary**

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

Pell Frischmann calculations

Note: Numbers may not sum due to rounding

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

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

Pell Frischmann calculations

Note: Numbers may not sum due to rounding

## 5.6. Baseline Mode Share Summary

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

## 6. Sustainable Transport Strategies

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

### THE CORE VISION

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

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

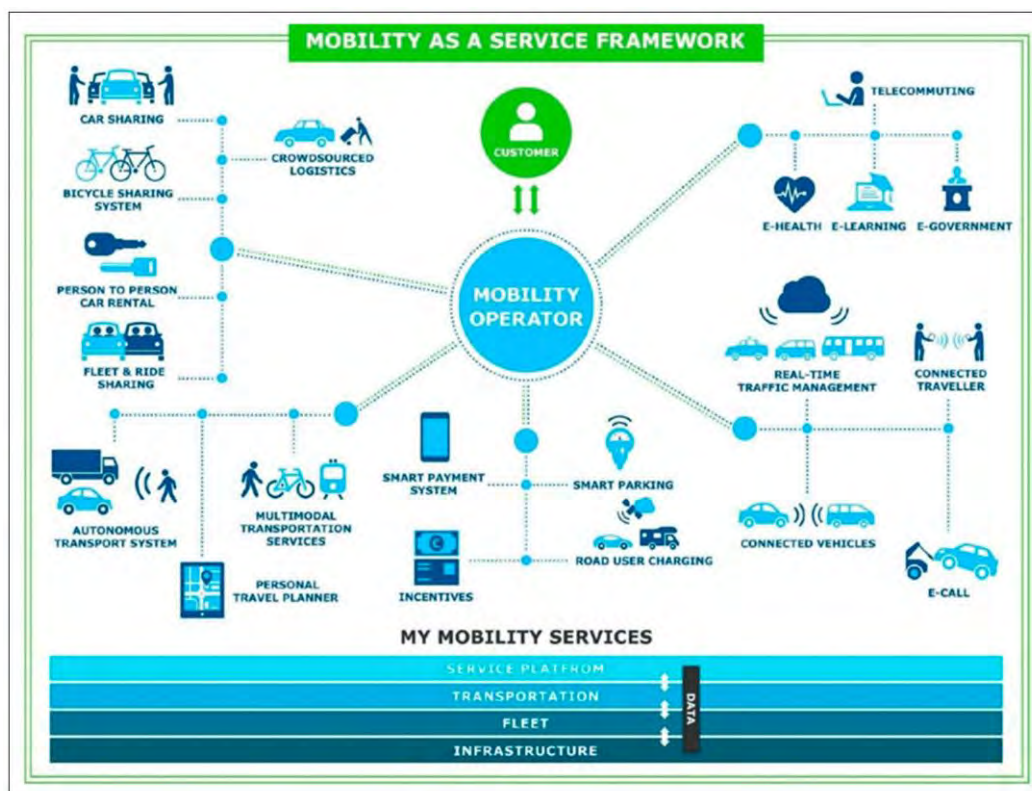
## 6.2. Place-making

- 6.2.1. In order to reduce the car dependency, localised trips to replace long distance trips should be encouraged; local trips have the greater potential to be shifted away from motor vehicles to alternative sustainable modes such as walking and cycling. Replacing the *need* to travel long distances can be an effective way to capture frequent and regular leisure and employment trips such as commuting, education trips and shopping. For this to be achievable, place making must be brought forward in line with active travel infrastructure.
- 6.2.2. Increasing localised trips by reducing the necessity to leave the Hoo Peninsula for everyday services and facilities would be an effective way to reduce travel by private car. As well as meeting the needs of the new users of the proposed developments, this strategy also has the capacity to change the travel habits of the existing residents and employees of the Hoo Peninsula. This is achieved by co-ordinated mixed development.
- 6.2.3. A range of local employment sites and facilities will need to be considered for development on the Hoo Peninsula, including schools, retail stores and medical facilities.
- ### 6.2.2. Integrated Transport Ticketing / Mobility as a Service (MaaS)
- 6.2.4. In Medway, integrated ticketing has the opportunity to connect between different modes of public transport. There are two primary train operators in the area (Southeastern and Thameslink) and four bus operators (Arriva, Nu-Venture, Redroute Buses and Stagecoach, which connects Medway to wider

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

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

Figure 6.1: MaaS Framework



Source: Kivimäki et al (2014)

### 6.2.3. Hoo St Werburgh Mobility Hub / Interchange

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

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

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

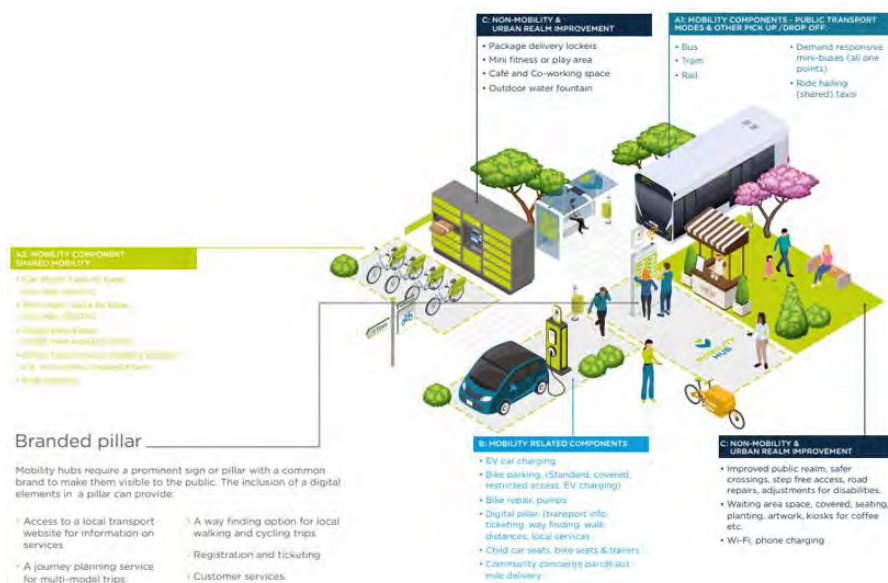
- Access to local bus service;
- DRT feeder service;
- Car club parking bay(s);
- Secure cycle storage;
- Bike share / Micromobility scheme;
- Cycle repair stand / pump;
- Electric vehicle charging bays; and
- Digital pillar (providing information on local transport, way-finding, walking distances and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

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

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

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

**Figure 6.2: Components of mobility hubs**



Source: UK Mobility Hub Guidance, CoMoUK (2019)

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

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

#### 6.2.4. Amenity Accessibility

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

**Table 6.1: Suggested acceptable walking distances**

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

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

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

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

#### 6.2.5. Site Development

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

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

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

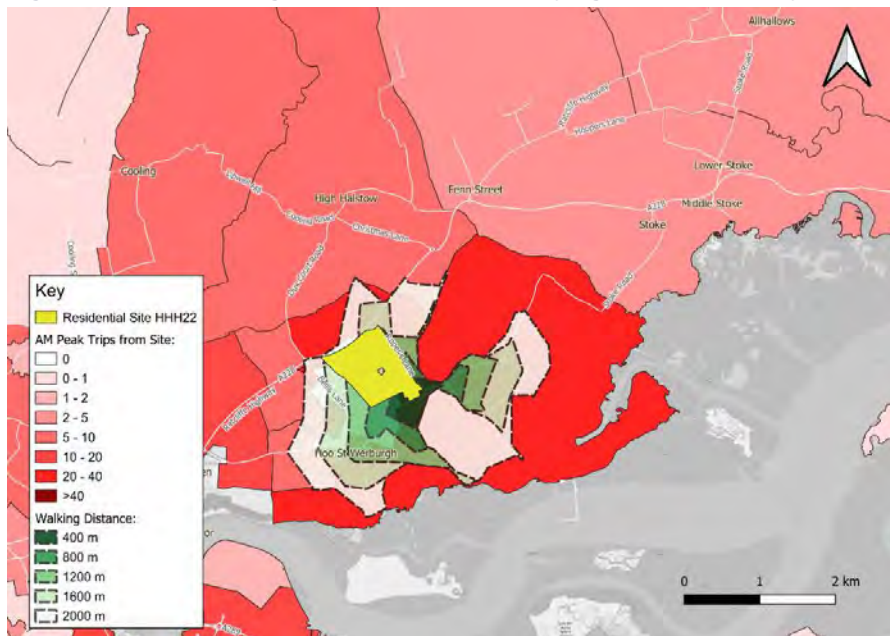
### 6.3. Active Travel Improvements

#### 6.3.6. Walking Opportunities

6.3.1. In the 2015 CIHT guidance *Planning for Walking*, walking neighbourhoods are defined as “having a range of facilities within 10 minutes’ walking distance (around 800 metres)” (p. 30), which also corresponds to recent Active Travel England (ATE) guidance (Criterion 3, *Planning Application Assessment Tool*).

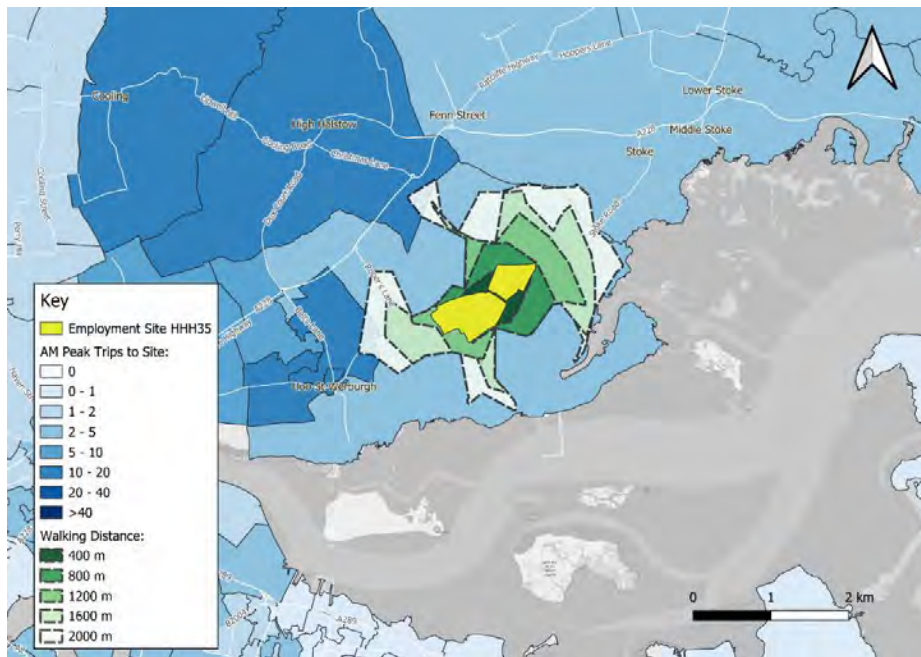
6.3.2. Using this idea of a “walking neighbourhood”, Figure 6.3 and Figure 6.4 show the accessibility of the proxy residential and employment sites at Hoo St Werburgh within 25 minutes’ walk time. These accessibility isochrones are overlaid on AM peak departure and arrival choropleths respectively.

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



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

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



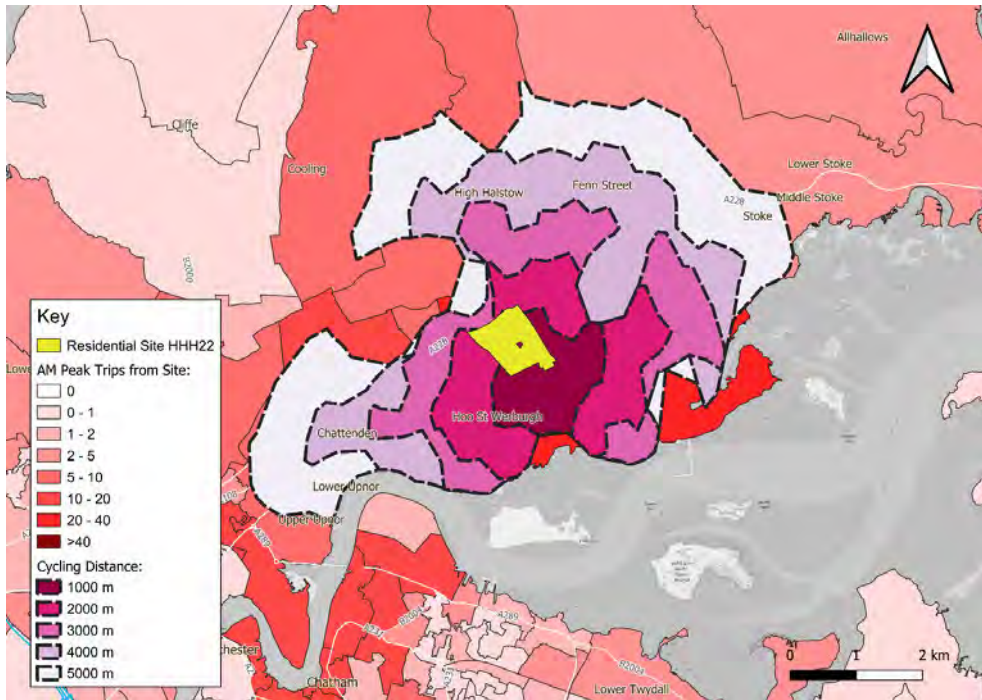
Source: OpenStreetMap Contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

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

### 6.3.7. Cycling Opportunities

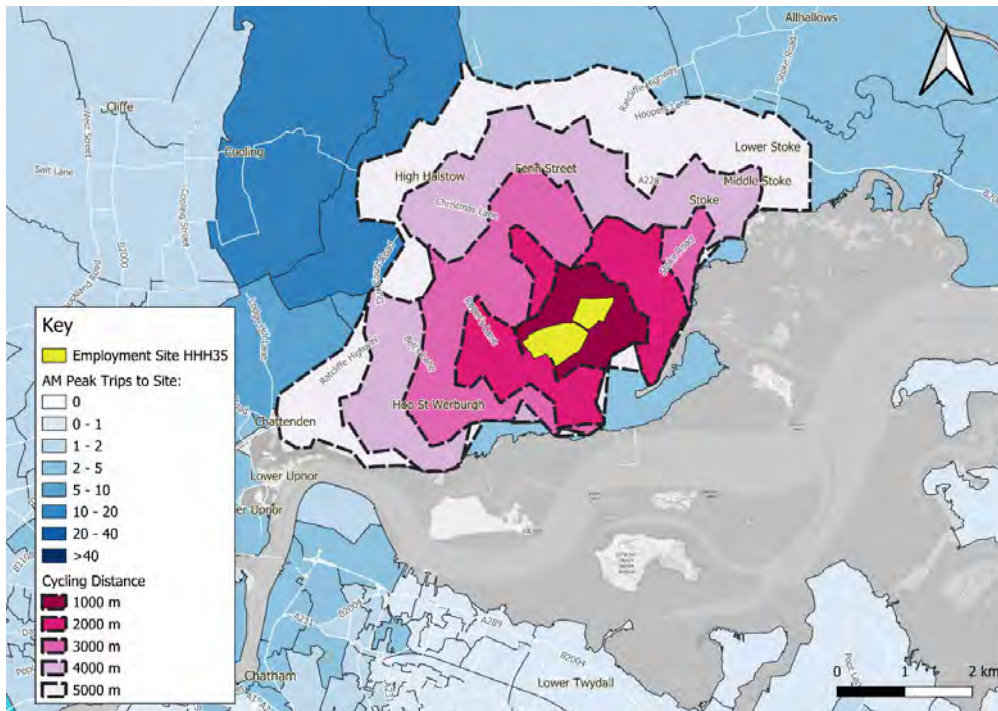
- 6.3.5. Whilst national and local policy encourages sustainable development and a shift away from private car use, there is no specific recommended maximum cycle distances for access to services / leisure facilities from new developments stated within the NPPF or local planning policy. The distances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

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



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

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



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

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

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

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

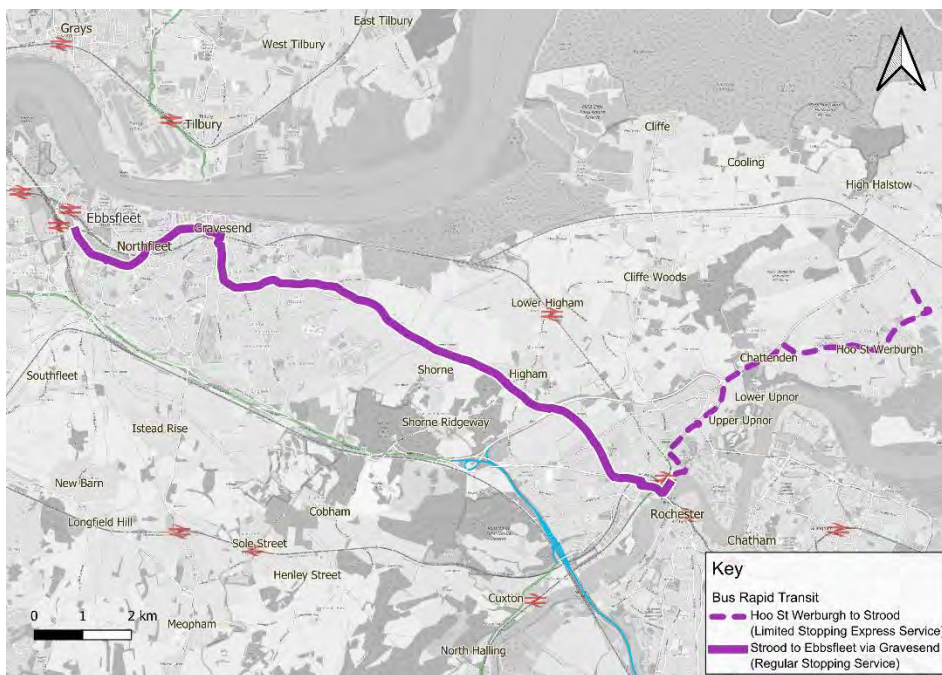
## 6.4. Bus Strategy

### 6.4.8. Bus Rapid Transit (BRT)

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

- 6.4.2. The proposed route is summarised in Figure 6.7.

**Figure 6.7: Proposed BRT Route**



Source: OpenStreetMap contributors with Pell Frischmann annotations

- 6.4.3. Key components of BRT systems which can be explored in Medway include:

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

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

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

**Figure 6.8: Cambridge BRT**



**Figure 6.9: Cambridge BRT Stop**



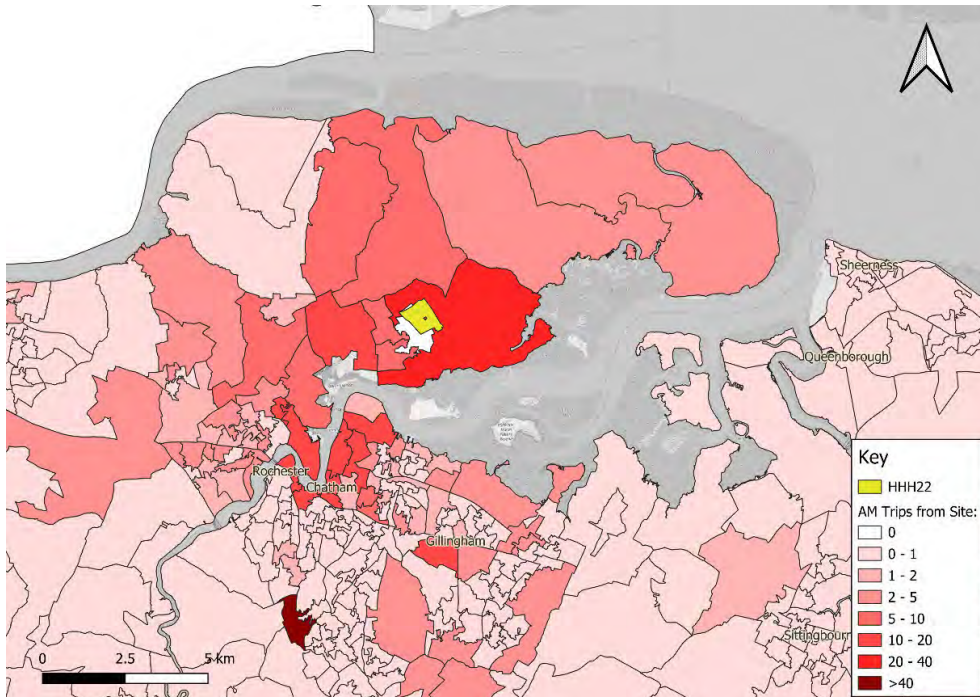
- 6.4.5. It is vital that bus services are integrated with railway stations and timetables. By ensuring that buses are well-coordinated with train schedules, seamless travel is facilitated to a range of employment and leisure destinations, thus encouraging multi-modal sustainable trips.
- 6.4.6. It is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

#### 6.4.9. Local Buses

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

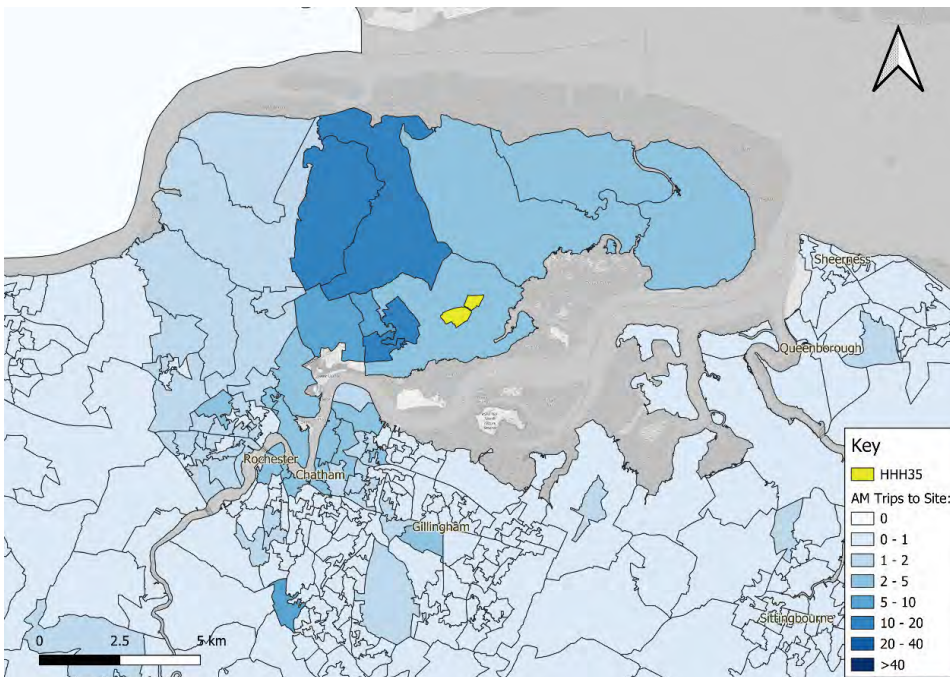
HHH22 and terminating at employment site HHH35 in the AM peak, with all permutations shown in Appendix B.

Figure 6.10: AM Residential Trips from Site



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

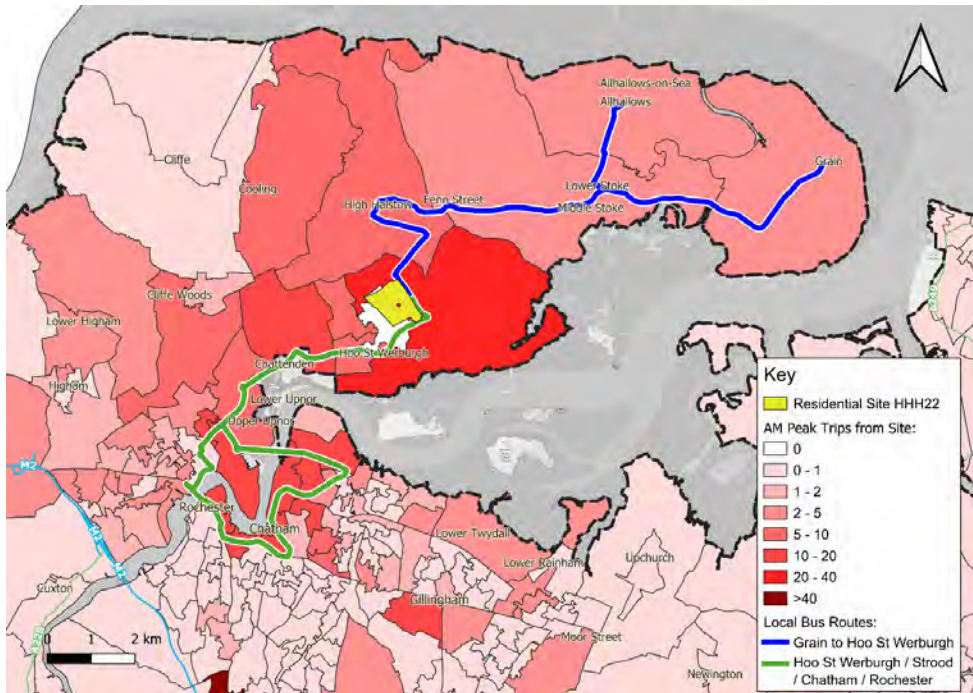
Figure 6.11: AM Employment Trips to Site



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

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

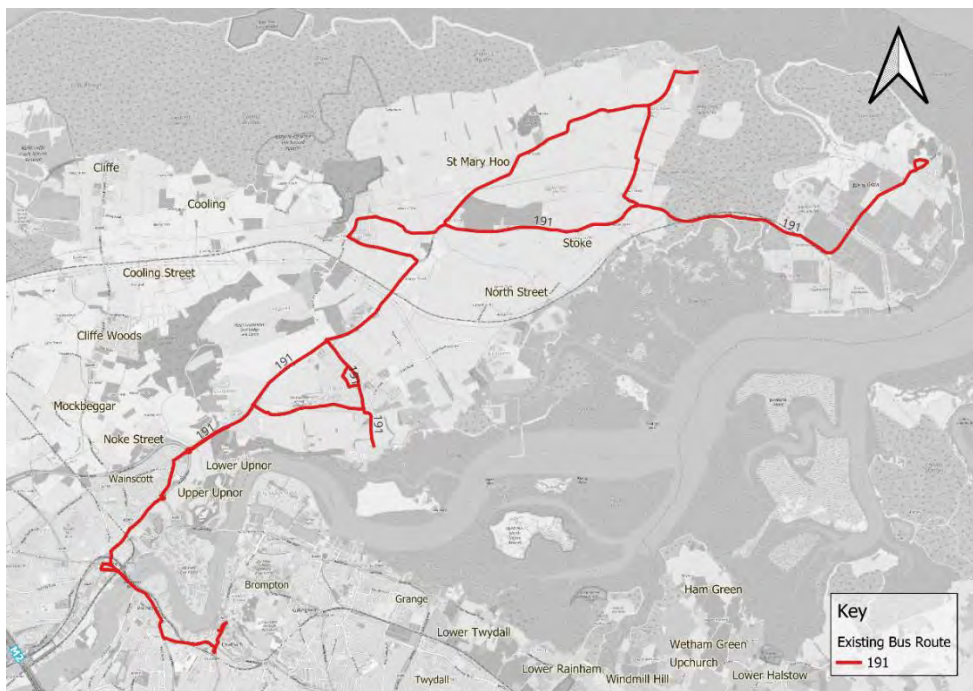
**Figure 6.12: Suggested Bus Routes**



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

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

**Figure 6.13: Arriva Route 191**



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

#### 6.4.10. Embedded from the Outset

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

### 6.5. Sustainable Transport Interventions Summary

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

## 7. Sustainable Transport Modelling – Fulfilled Vision

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

## 7.2. Sustainable Mode Share

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

**Table 7.1: Anticipated AM Mode Share following Strategic Transport Interventions**

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

Numbers may not sum due to rounding

**Table 7.2: Anticipated PM Mode Share following Strategic Transport Interventions**

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

Numbers may not sum due to rounding

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

### 7.3. Sustainable Mode Share Summary

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

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

## 8. Realised Vision for the Hoo Peninsula

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

### 8.2. Daily Life on the Hoo Peninsula

8.2.1. Some typical journeys have been considered for how people might move around the Peninsula on an average day.

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

### 8.3. Resulting Public Transport Provision

8.3.1. Based on the above mode shares, this section summarises the public transport provision that would be required to accommodate such an ambitious public transport modal share. The following points and assumptions should be noted and are sought for agreement:

- These resulting bus requirements relate only to the additional public transport trips by the proposed developments. This does not consider the increase in patronage due to modal shift by existing residents and employees on the Hoo Peninsula and wider Medway.
- This is the most sustainable transport scenario. Bus capacity requirements has been considered for all bus and rail passengers from the proposed developments.
- The calculations are based on a planning occupancy on 75 passengers per bus. This is sought for agreement with MC and local bus operators.
- The overall required bus capacity has been calculated based on the modal shares outlined previously. At this stage, it does not consider the split between local and BRT routes.

8.3.2. Calculations have been split into employment and residential trips for both AM and PM peaks. In the AM peak, departure trips are taken as leaving the Hoo Peninsula and arrival trips are taken as arriving onto the Hoo Peninsula; the inverse is true in the PM peak. Alleviating congestion at the Four Elms roundabout at the southern end of the Hoo Peninsula is a primary indicator on the realising low carbon growth on the Hoo Peninsula, therefore this methodology provides a rigorous assessment of the transport conditions.

8.3.3. Using the modal trips rates provided in Table 7.1 and Table 7.2, a minimum bus provision has been calculated. and is summarised in Table 8.1 for the AM and PM peak hours. This is the final bus provision required for the entire built out development on the Hoo Peninsula; in reality a phased public transport approach will be required to match the phased build out of the developments on the Hoo Peninsula.

**Table 8.1: Minimum Bus Requirements**

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

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

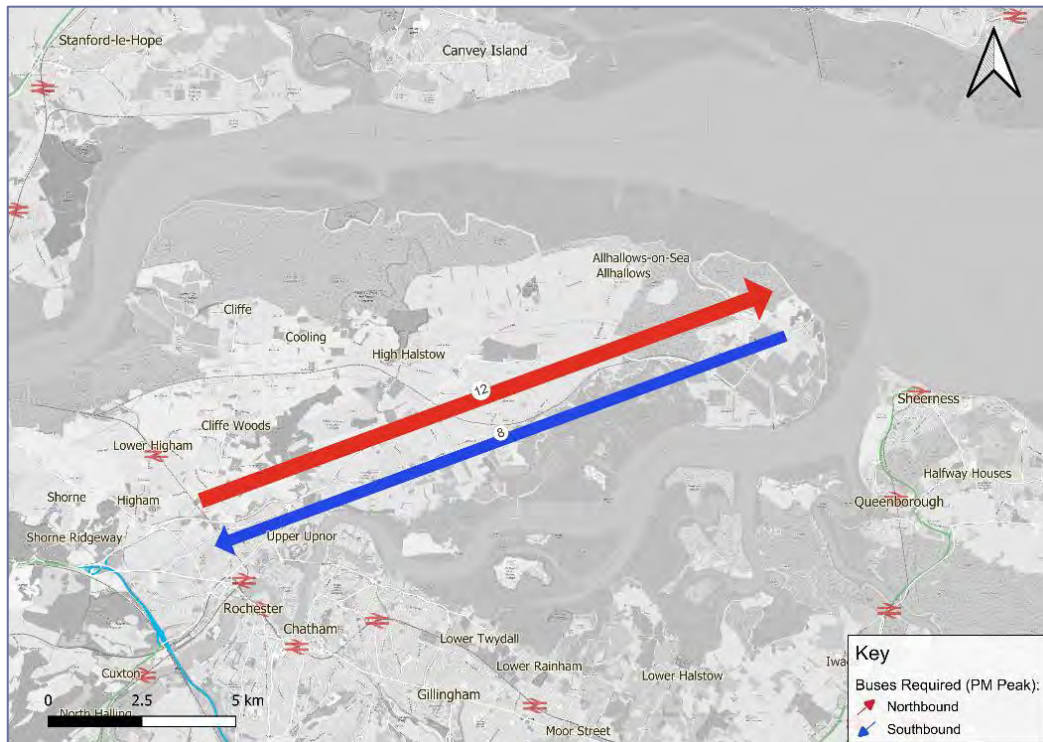
8.3.4. This results in the following bus transport vision for the AM and PM peak.

**Figure 8.1: AM Peak Hour Bus Requirements**



Source: OpenStreetMap contributors with Pell Frischmann annotations

Figure 8.2: PM Peak Hour Bus Requirements



Source: OpenStreetMap contributors with Pell Frischmann annotations

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

### 8.3.1. Staged Bus Provision

8.3.6. The proposed increase in bus services could result in up to 14 additional buses operating during the morning peak period, it is important to recognise that this figure represents the projected maximum at the end of the Local Plan period, which spans approximately fifteen years. This long-term projection reflects the cumulative impact of development over time, rather than an immediate change.

8.3.7. The implementation of the bus strategy is expected to evolve gradually and adaptively, responding to the pace and scale of housing delivery. Rather than a fixed schedule, the rollout of new bus services will be both organic and demand-led, with services introduced incrementally as new homes are occupied. On average, this equates to less than one additional bus service per peak period per year. However, this progression will not necessarily follow a strictly linear pattern, as it will depend on actual build-out rates and the timing of infrastructure delivery.

8.3.8. The potential future bus provision has been discussed with the primary local operator and it has been confirmed that the number of buses set out above is achievable both in terms of available fleet and bus depot capacity.

8.3.9. No concerns were raised in regard to the number or frequency of buses proposed as part of the strategy.

## 8.4. Highway Network Impacts

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

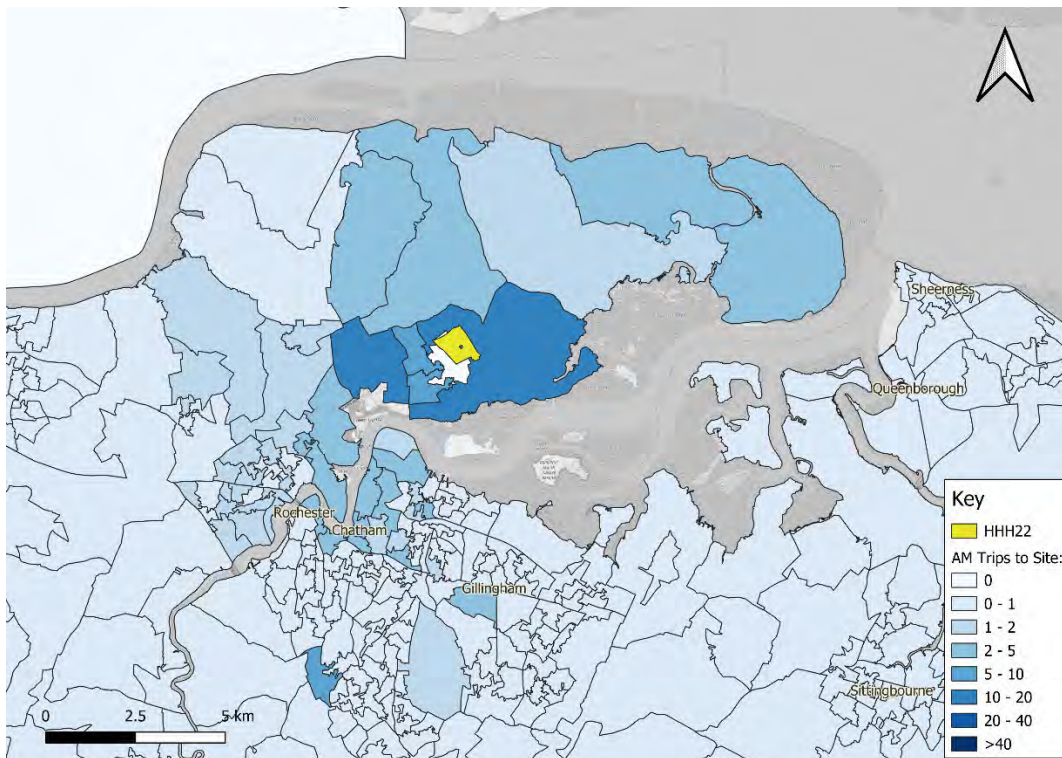
## 9. Summary and Conclusions

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

## Appendix A - Multi-Modal TRICS Data

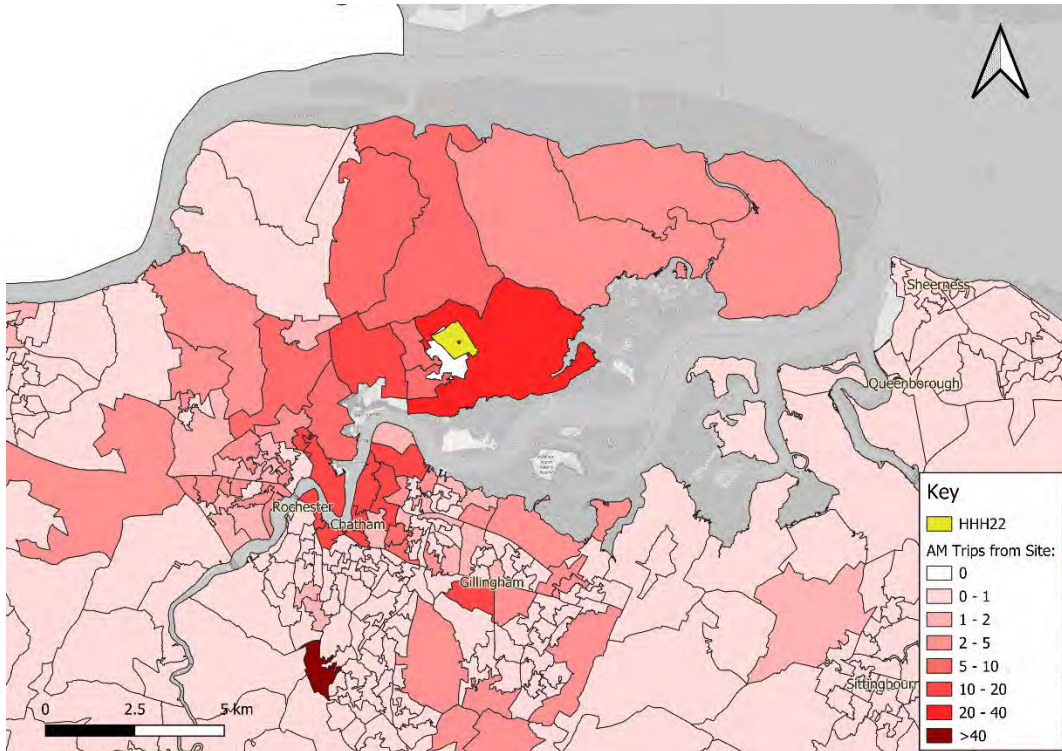
Site HHH22 – Proxy for Residential Development at Hoo St Werburgh:

Figure 9.1: AM Residential Trips to Site Choropleth



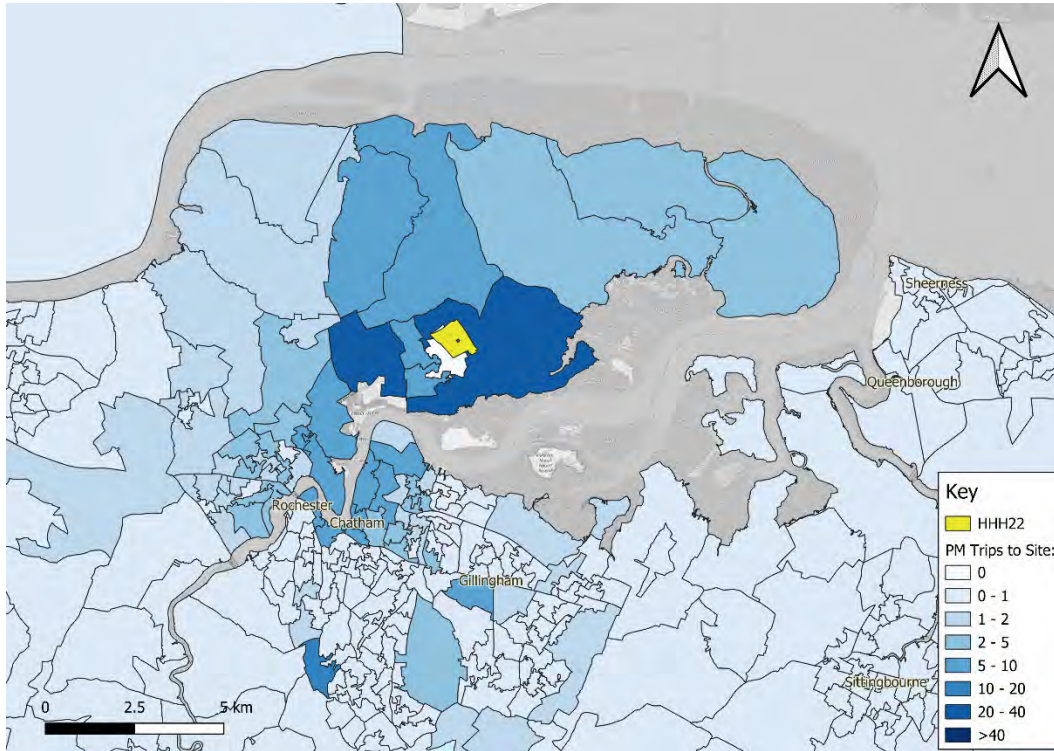
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.2: AM Residential Trips from Site HHH22



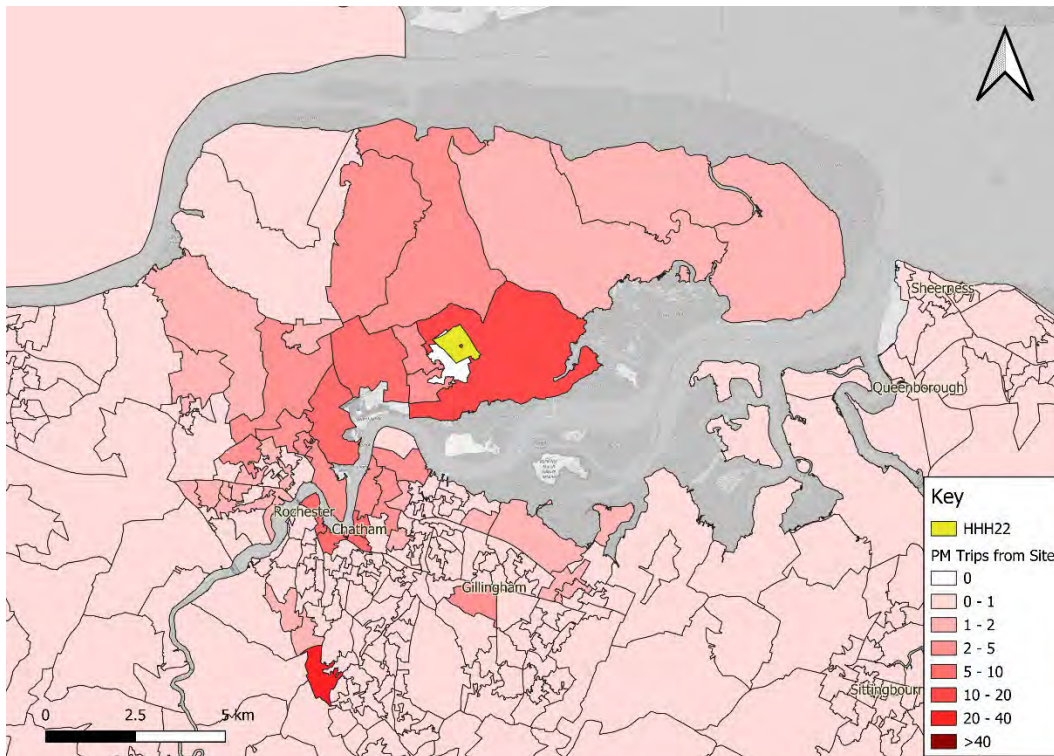
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.3: PM Residential Trips to Site Choropleth



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

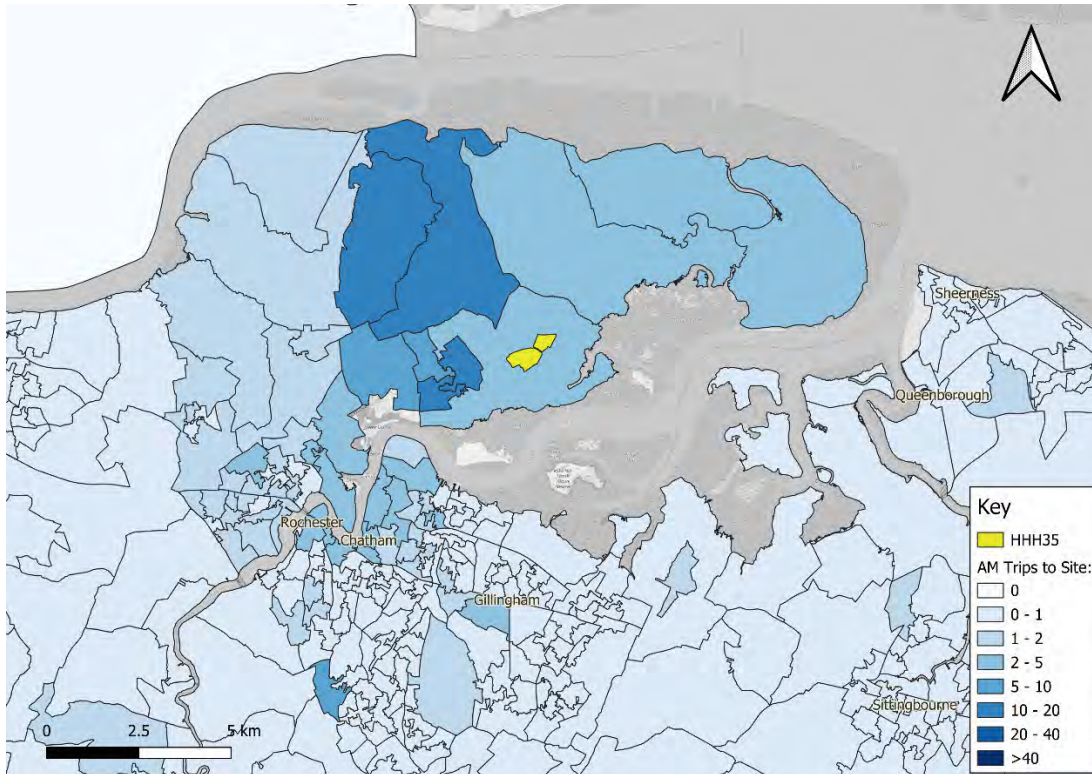
Figure 9.4: PM Residential Trips from Site Choropleth



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

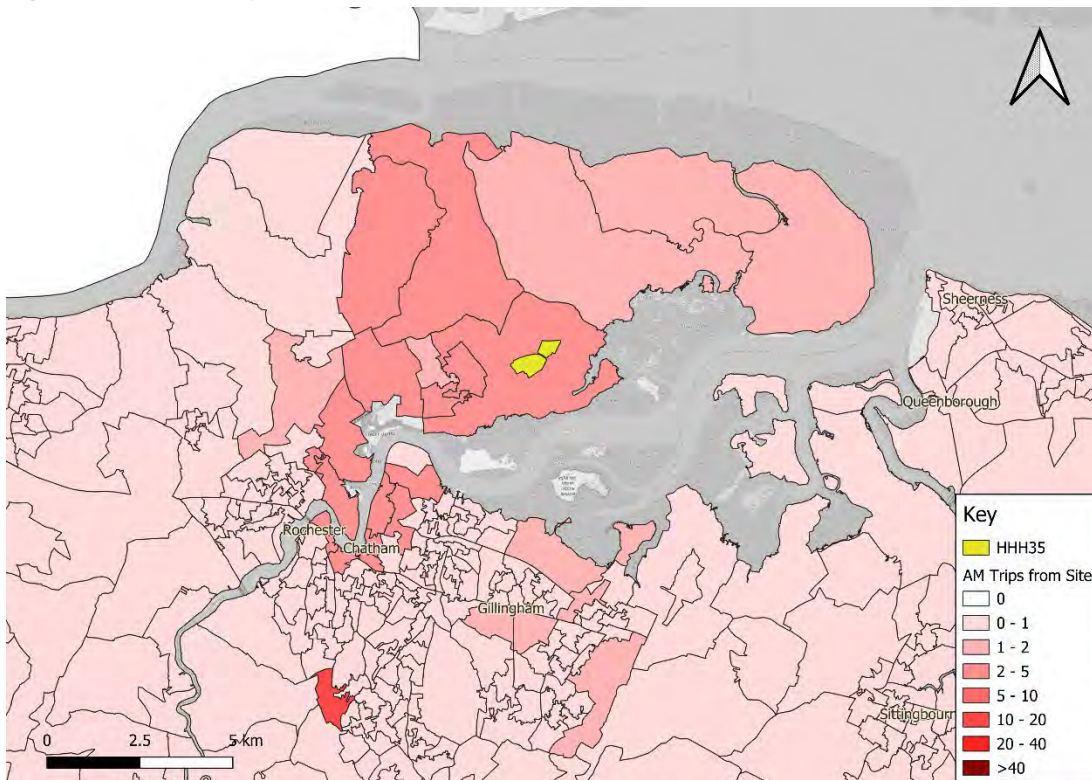
Site HHH35 – Proxy for Employment Development at Hoo St Werburgh:

Figure 9.5: AM Employment Trips to Site Choropleth



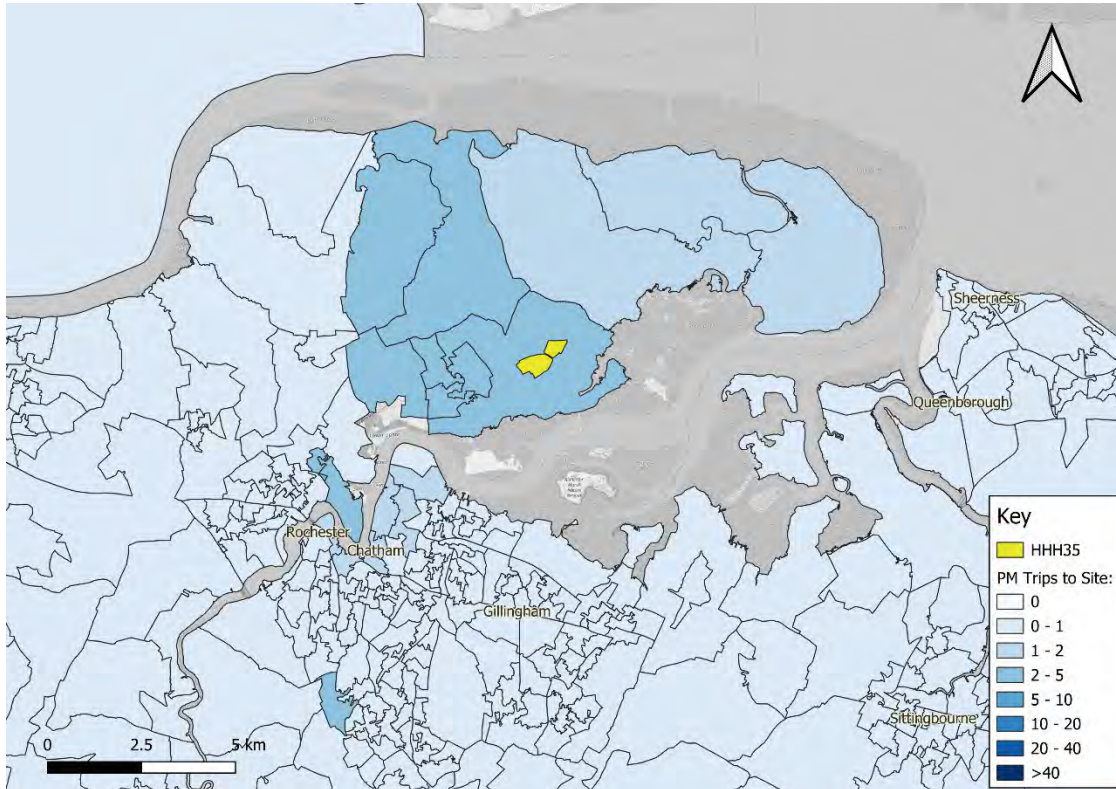
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

Figure 9.6: AM Employment Trips from Site Choropleth



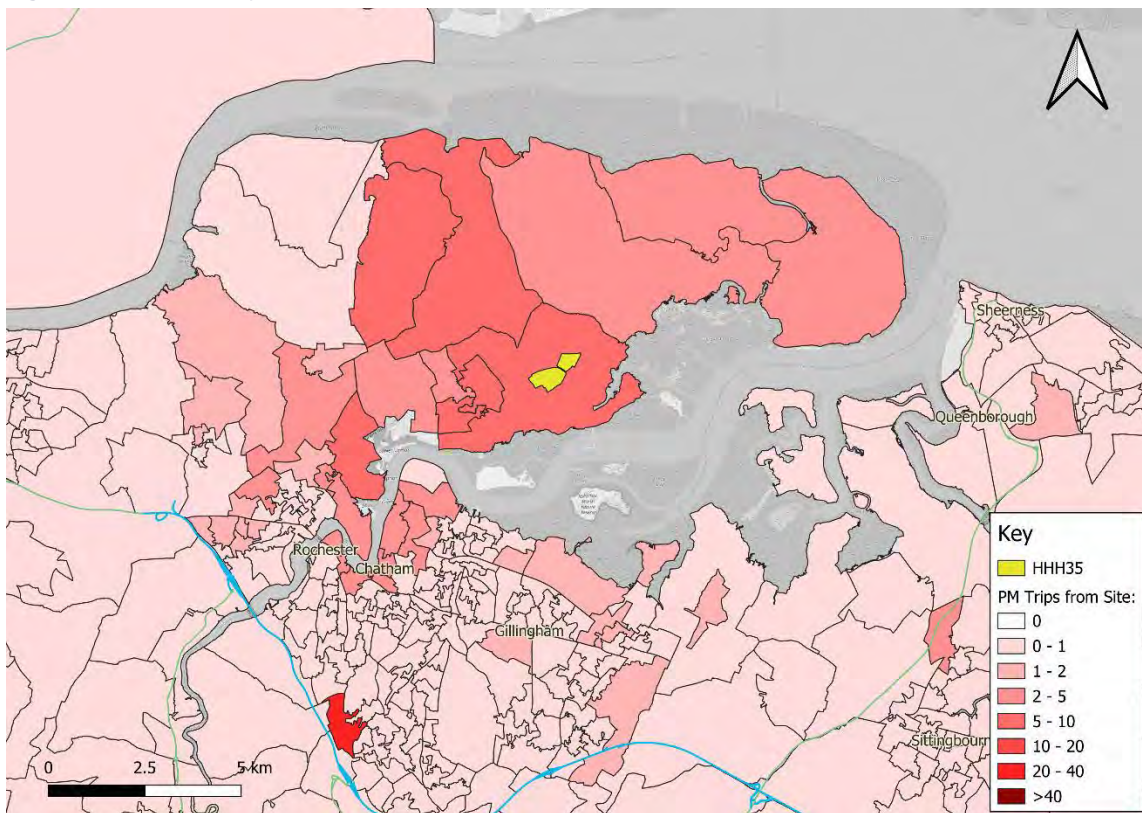
Source: OpenStreetMap contributors with Pell Frischmann annotations, based on Jacobs data (October 2024)

**Figure 9.7: PM Employment Trips to Site Choropleth**



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

**Figure 9.8: PM Employment Trips from Site Choropleth**



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

## Appendix B

11 August 2025



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

**Christian Colbeck MRICS**

E: [ccolbeck@savills.com](mailto:ccolbeck@savills.com)

M: 07976745339

33 Margaret Street W1G 0JD

[savills.com](http://savills.com)

Dear Sir/Madam,

### **Medway Local Plan, Regulation 19 Consultation**

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

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

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

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

### **IDP Costs**

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

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

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

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



### **Phasing of IDP Costs**

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

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

From previous conversations with the Council, we understand the 6FE Secondary School for Hoo is required early in the Plan period, prior to the occupation of a sufficient number of homes which could solely fund the £40-£45m cost estimate. For items such as these, which are required early in the Plan period, the Council is advised to explore alternative upfront sources of funding to facilitate the early delivery of infrastructure, with the cost recouped by subsequent S106 payments.

### **Local Plan Viability Assessment**

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

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

#### **Housing Numbers**

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

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

#### **Infrastructure Costs**

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

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



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

Developer Profit

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

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

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

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

Yours sincerely

A handwritten signature in black ink that reads "C 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	NA
Wastewater treatment infrastructure	Utilities & Waste	Medway wide	NA
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 £/m<sup>2</sup>, Functional unit and Group element prices studies all show costs with Preliminaries apportioned by cost. The Element cost per m<sup>2</sup> 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 m<sup>2</sup> studies will be different.

## Appendix C

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

\*Note: All figures exclude VAT.

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

\*Note: All figures exclude VAT.

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

\*Note: All figures exclude VAT.

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

\*Note: All figures exclude VAT.

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

\*Note: All figures exclude VAT.

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

\*Note: All figures exclude VAT.

# BENTLEY



## PROPOSED EDUCATION COSTS, MEDWAY

Benchmark Analysis & Cost Estimate

for

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

Discovery House  
Mere Way  
Ruddington Fields Business Park  
Ruddington  
Nottingham  
NG116JW

Development Management | Cost Management | Project Management  
0115 983 0157  
[www.bentleyprojectmanagement.co.uk](http://www.bentleyprojectmanagement.co.uk)

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

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

**BENTLEY**

**BENCHMARK ANALYSIS**

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

**Notes**

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

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

**BENTLEY**

**BENCHMARK ANALYSIS**

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

**Notes**

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

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

**BENTLEY**

**BENCHMARK ANALYSIS**

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

**Notes**

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

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

**BENTLEY**

**BENCHMARK ANALYSIS**

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

**Notes**

- \* All figures exclude VAT
- \* No allowance made for inflation / indexation beyond 3rd Quarter 2025
- \* Gross Internal Floor Area (GIFA) based on the floor area 7,200m<sup>2</sup>. This is based on average 'gross area' area from 'Building Bulletin 103 - June 2014 - Area Guidelines for Mainstream Schools'. This is indicative, subject to design advice and does not include Post-16 provision.
- \* BCIS Base build cost is the median figure for new build Secondary Schools (refer to Appendix A).
- \* National Schools Benchmarking figure is taken from the July '22 (v.16) publication - 'New Development Summary'. We have used the average 'Gross Cost per m<sup>2</sup>' for works 5,000m<sup>2</sup> - 7,500m<sup>2</sup> in size.
- \* All costs above rebased to Q3 2025 and to the Medway area using BCIS 'All in Tender Price Index' and 'Location Factor'
- \* Contingency allowance of 10% included.
- \* Allowance of £850/m<sup>2</sup> is included for external works. The extent of works is unknown at this stage.

**APPENDIX A - BCIS AVERAGE PRICE ANALYSIS**

## £/M2 STUDY

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

Last updated: 26-Jul-2025 07:30

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

## MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

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

## £/M2 STUDY

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

Last updated: 26-Jul-2025 07:30

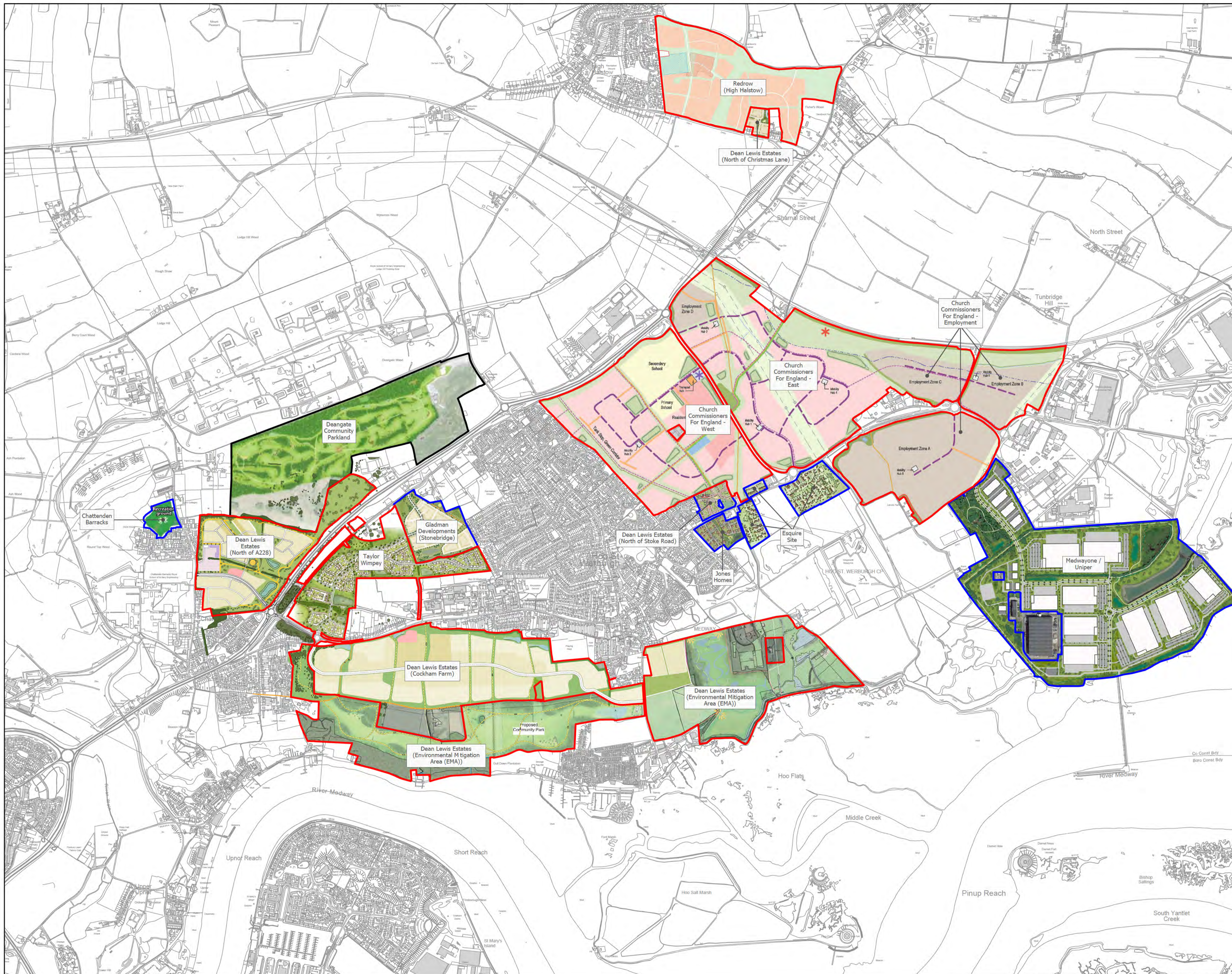
Rebased to 3Q 2025 (403; forecast) and Medway ( 109; sample 23 )

## MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

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

## Appendix D

- Consortium Boundaries
- Other Boundaries
- Council Boundaries



Project: **GREATER HOO CONSORTIUM 4**

Drawing Title: **COMPOSITE MASTERPLAN**

Date: 15.04.25  
 Project No: 333102200

Scale: 1:10,000 @A1  
 1:20,000 @A3  
 Drawing No: STN-GEN-SW-DR-MP-01C

Drawn by: J.W.  
 Check by: N.T.  
 Revision:



**Stantec**  
 DRAFT

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

## Appendix E

## Policy SA8: Hoo St Werburgh and Chattenden

### Objectives

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

### Criteria

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

### Centres and retail

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

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

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

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

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

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

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

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

**Commented [AJ8]:** Duplication of Criteria 8?

## Infrastructure

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

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

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

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

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

## Transport

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

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

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

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

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

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

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

## Environment and heritage

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

17. A green infrastructure strategy will inform the design of development, reflecting the neighbourhood approach, and providing connections to surrounding rural area. This will draw on the area's heritage, providing a long-term management plan for historic assets.

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

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

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

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

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

- Deangate Community Parkland
- Cockham Community Parkland
- Hoo Wetlands

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

#### Employment

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

#### Subsequent design principles

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

#### Site-specific information

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

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

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

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

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

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

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

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

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

## 14.10 High Halstow

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

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

### Policy SA9: High Halstow

#### Objective

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

#### Criteria

2. Development of the two sites (HHH26 and HHH29) will be brought forward in ~~accordance with a masterplan for the combined area~~ comprehensive manner.
3. Development will be designed to successfully integrate new and existing communities in the village, through design and community facilities. Development should ensure maximum connectivity and permeability between the site and existing village, such that it is well-integrated with and becomes part of the village, optimising connectivity to ~~and the viability of~~ the village centre.
4. Development will retain the distinct identity of High Halstow as an historic village, and avoid coalescence with nearby settlements, ~~through planning for landscape buffers and interface with the countryside setting, seeking and will seek~~ opportunities to enhance landscape character.
5. Any new development should respect the village feel, should be of a high quality of design and provide defined character areas that reflect variety in house types, layout, density and landscaping.
6. Housing shall meet local needs, ~~with reference to the Medway Local Housing Needs Assessment, 2025, and other local evidence, such as in the preparation of the Neighbourhood Plan, or subsequent updates as evidenced in the latest~~

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

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

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

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

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

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

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

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

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

**Subsequent design principles**

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

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

**Site-specific information**

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

HHH29	Parcel north of Christmas Lane, High Halstow	Residential	Up to 55	1-5
-------	--	-------------	----------	-----



Department  
for Education

**Department for Education**  
Sanctuary Buildings  
Great Smith Street  
London  
SW1P 3BT

[www.gov.uk/dfes](https://www.gov.uk/dfes)

**Our Ref: DfE/SPD/ Developer Contributions and Obligations Guide**

05.05.2026

Dear Sir/Madam,

**Re: Medway Developer Contributions and Obligations Guide SPD**

**Consultation under Regulation 12 of Town and Country Planning (Local Planning) (England) Regulations 2012**

**Submission of the Department for Education**

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/new schools and DfE is the delivery body for some of these, rather than local authorities. Local authorities have a statutory responsibility to ensure sufficient education provision, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new education infrastructure, also including early years, and post 16 provision. We have published guidance on securing developer contributions for education and estimating pupil yield from housing development, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding Planning Practice Guidance on planning obligations, viability and healthy and safe communities.<sup>1</sup>

**Developer contributions**

3. We welcome the inclusion of a dedicated chapter on education within the draft Medway Developer Contributions and Obligations Guide SPD. The document appropriately recognises that housing development generates additional demand for education infrastructure and that developer contributions may be required to mitigate the resulting impacts. However, the Department considers that a number of elements of Section 10 would benefit from clarification and refinement to ensure closer alignment with national policy and the Department's published guidance on securing developer contributions for education, and to strengthen the clarity, transparency and robustness of the underlying methodology.

---

<sup>1</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

### **Pupil Yield Methodology**

4. The Department recommends that the SPD provides greater clarity on the pupil yield methodology used to calculate education contributions. While Section 10 includes reference to pupil product yield per dwelling type it does not set out information regarding assumptions or formulas applied by dwelling size or type. Our guidance recommends that pupil yield assumptions should be evidence-based, informed by recent local data—including school census returns, SCAP forecasts and monitoring of completed developments—and subject to regular review. The Department therefore recommends that Medway Council explicitly sets out the pupil yield factors applied by unit size and type and includes a clear commitment to review these assumptions periodically in light of updated local evidence.

### **Coverage of Early Years, SEND and Post-16 Provision**

5. The Department notes that the draft SPD focuses primarily on mainstream primary and secondary education, with more limited coverage of other education phases. As local authorities hold statutory duties in relation to early years provision, special educational needs and disabilities (SEND), and post-16 education, and housing growth can generate demand across all of these areas, the Department recommends that the SPD addresses these phases more explicitly. Setting out, where appropriate, how developer contributions may be sought for early years, SEND and post-16 provision, supported by local sufficiency assessments, participation data and strategic planning evidence, would ensure the SPD more fully reflects the range of education needs arising from new development in Medway.

### **Review Mechanisms for Larger and Phased Developments**

6. The Department recommends that the SPD includes a defined review mechanism for large or phased developments with extended build-out periods. Departmental guidance recognises that education capacity, demographic trends and forecasting assumptions may change over time, and that review-at-commencement or mid-phase mechanisms can help ensure that education contributions remain proportionate and evidence-led. Including such a mechanism would provide appropriate flexibility while remaining fully consistent with the statutory tests for planning obligations.
7. The Department supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations. We support Medway's proposed use of Section 106 for funding education infrastructure as it provides more certainty that developer contributions will be used to fund the new school, early years or sixth form places where need arises.

### **Conclusion**

8. Finally, I hope the above comments are helpful in shaping the Medway Developer Contributions and Obligations Guide SPD, with specific regard to the provision of land and funding for education infrastructure. Please advise the department of any proposed changes to the emerging policies and/or evidence base arising from these comments.

9. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to working with Medway Council to aid in the preparation of sound policies and guidance for education.

Yours faithfully,

[Redacted]

**John Pilgrim MRTPI**  
Forward Planning Manager – North

[Redacted]

[Redacted]

Web: [www.gov.uk/df](http://www.gov.uk/df)

SENT BY EMAIL

Date

Dear Sir/ Madam

### **MEDWAY DEVELOPER CONTRIBUTIONS SPD**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Developer Contributions SPD.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

### **General comments**

3. The Council will need to update the viability study that has been produced to justify the policies in the submitted local plan. Paragraph 7.35 notes that the average amount agreed on approved schemes is a little under £10,000. Given that the education contribution per unit would increase, in some cases, by over 50% and contributions for health will potentially increase from circa £900 to £7,000 per dwelling there is a significant risk that other requirements in that local plan will no longer be viable. The total potential contributions from development increase from just over £18,000 per dwelling to over £32,000. While it is recognised that not all contributions will be applicable in all circumstances it is a significant increase that will require justification at the hearings on the local plan.

### **Self- Build and Custom Housebuilding**

4. Paragraph 6.3 states that after 12 months marketing period any unsold plots should first be offered to the Council to acquire for the provision of affordable housing. Given that these homes form part of the market housing element of a development and are sold and built as market housing there is no justification for requiring the developer to offer these to the Council before being built out as market housing. This approach has been considered by the inspectors examining both the St Albans (MM49<sup>1</sup>) and Spelthorne Local Plans (MM53<sup>2</sup>) to be unsound with this requirement being removed from local plan policies. Therefore, paragraph 6.3.2 must be amended as follows:

---

<sup>1</sup> <https://stalbans-consult.objective.co.uk/kpse/event/7DD350FC-F0EB-42A4-B050-99798D2978DD>

<sup>2</sup> <https://www.spelthorne.gov.uk/page/1383/local-plan-march-2026>

6.3.2 If any plot(s) remain unsold after being marketed for the minimum period, will be returned to the developer to be built out as market housing. ~~they can either remain for sale as a self/custom build plot or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction[1]. To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s)[2]. This provision will be secured as part of the original Section 106 agreement.~~

## **Cultural Services**

### *Cultural and community infrastructure*

5. HBF do not consider the council to have provided sufficient justification to show that such services are required to make development acceptable in planning terms. While the provision of improvements to these services may be beneficial to wider society these are services that can be delivered through the network of existing facilities and should be provided for and supported by the Council through Council Tax and not via developer contributions. The Council's evidence notes that their participation in Medway is lower than the national average. However, this does not necessarily indicate that there is a lack of facilities but potentially a lack of interest in such activities. As such there is no evidence to show that those people moving into new homes will provide any additional strain on such services that cannot be addressed through increased Council Tax collected as a result of new development. As there is no evidence as to how the proposed charges of £251.84 per dwelling was arrived at and whether this is reasonable or fair, it should be deleted from the SPD.

### *Heritage and Tourism Infrastructure*

6. The SPD proposes that the council will seek a financial contribution from all development within 1000m of a heritage site. It is noted that tourism is a key driver of Medway's economy, but no evidence is provided that new homes close to heritage sites will place an additional burden that needs to be addressed in order to make that development acceptable. As such the proposed contribution is not justified and should be removed from the SPD.

### *Library and archive service*

7. As with other cultural and community infrastructure, any provision of additional demand from residents in new homes for libraries and archives will be met via the council tax paid from these new households. If there is a need for a new library due to the additional needs generated from a development in a particular location, then the Council will need to set this out in the local plan and identify the cost of delivering this rather than place a general per dwelling cost on all new homes. HBF consider it necessary for this general charge to be deleted from the SPD.

## **Education**

8. The Council are proposing a significant increase in the per unit contribution for education. This is based on the cost of delivering a new or expanded school as set out in most recent DfE local authority school places scorecard for Medway and the pupil yield in table 6 of the SPD. Firstly, HBF are concerned that the Council is basing its pupil yield on Council are using evidence from a MORI survey undertaken in 2005/06. This survey, which is over 20 years old, will have failed to take into account more up to date evidence such as the significant decline in fertility rates and is in direct contradiction with paragraph 17 of the DfE Guidance on Developer Contributions which states:

*“Pupil yield factors should be based on up-to-date evidence from previous local housing developments, so you can predict the education needs for each phase and type of education provision arising from new development. To understand how pupil yield builds up in developments over time, you can consider pupil yield from developments completed 10 or more years ago as well as those built more recently. You are under no obligation to review pupil yields continually, but we recommend refreshing your data approximately every five years.”*

9. At present the ONS estimates on births in England Wales show that fertility rates currently at 1.44 - the lowest since records began. The number of births in 2023 has fallen below 600,000 for the first time since 2002 and well below the circa 640,000 in 2005. This decline in fertility will have an impact on Medway and impact significantly on the pupil yield ratios set out in table 6 of the guidance with fewer children per property type.
10. Secondly, HBF do not consider that the pupil yield ratios based on houses and flats rather than number of bedrooms is sound. Such an approach fails to consider the fact that a two bedroomed house will have a far smaller pupil yield than a three bedroom flat or four bedroomed house. For example, the Surrey County Council Developer Contributions Guide includes yield factors based on bedroom size. The yield proposed in this guide shows a 3 bedroomed dwelling has a yield of 0.19 for secondary and 0.3 for primary but a 2 bedroomed dwelling as 0.07 and 0.09 respectively. On a large site with a wide range of homes being delivered this could lead to an over estimate of the pupil yield and subsequent contribution that would be required based on this guide and as such would not be fairly and reasonable related to the scale of the development being proposed.
11. If the Council are to update the costs relating to education, it must both update the evidence relating to pupil yield to reflect changes in fertility rates and other demographic changes since 2005 and set out the pupil yield on the basis of number of bedrooms rather than flats and houses. Without these changes the proposed contributions cannot be considered to be justified or consistent with the tests for planning obligations in paragraph 58 of the NPPF.

## **Skills**

12. The SPD suggests that planning obligations provide vital opportunity to support the population that are not in education, employment or training (NEET) to gain vital skills in the right provision that contribution with be

sought to deliver bespoke programmes in areas of priority and skills shortage. While HBF recognises the importance of increasing skills we would question whether it is of development industry to fund the work of the Council, especially as it already does this through its support of CITB and the HBF's Home Building Skills Partnership (HBSP) . Through the HBSP, we work closely with home builders, the supply chain companies and industry training bodies to address common challenges in recruiting and developing the workforce.

13. The HBSP's focus stretches beyond traditional training and upskilling to include equality, diversity and inclusion, and employee wellbeing initiatives. This is delivered under two core workstreams: talent attraction and skills and development. A genuine strategic approach is needed to improve the training of people in the construction trades. This includes an evaluation of the future skills needs of employers, and an evaluation of the quality of the training that is available through colleges. It is therefore unjustified for the Council to seek payments for such activities from housebuilders given that they are already contributing to improvement of skills nationally and they should be removed from the SPD. Rather than collect contributions we would suggest the Council speak to the HBF's Home Building Skills Partnership would welcome the opportunity to discuss the construction skills needs of the area with the Council, this would likely be more beneficial than what is being proposed.

#### **Health**

14. In seeking to require contributions from NHS Kent and the Medway Integrated Care Board the Council will need to consider the fact that the funding of such services is already addressed through national funding formulas and that as such is no funding gap the provision of some health services arising from new development. This was considered in the case of R (University Hospitals of Leicester NHS Trust) v Harborough District Council [2023] EWHC 263 (Admin) where the NHS Trust challenged the grant of planning permission for 2,750 homes on the basis that a contribution had not been secured to address the impact on its services arising from new residents. Holgate J found the answer to the claim was that the Trust had failed to demonstrate that population growth would not be taken into account in the annual negotiations with the Clinical Commissioning Groups (now called Integrated Care Boards). Therefore, requiring the a contribution towards services commissioned by NHS Kent and Medway ICB will not be fairly and reasonably related to development as they should have already been funded nationally and it is not for the development industry to take up any slack within this funding.

#### **Social care**

15. There is no justification for this contribution. The Council note that it is not currently meeting its duty with regard to provision of care homes social. However, is its responsibility and it is not the responsibility of housebuilding industry to provide contribution towards the delivery of social care in Medway. This is for the Council to plan for within the Local Plan in partnership care home providers. It is not necessary to make residential development of 10 or more homes sound in planning terms. The contribution should be deleted.

#### **Open space and outdoor formal sport**

16. Paragraph 15.1.3 states that need for open space provision will be assessed on a site by site basis, yet the Council has proposed a specific per dwelling cost. Given that what is needed to make the development acceptable in planning terms is not known until an application is assessed, it is not possible to provide a per dwelling cost. In some areas where there is adequate provision of open space and sports facilities there may not be any per dwelling charge or it may be provided by the developer on site. HBF could also find no evidence as to how this cost was arrived at. If this figure is to be included in the SPD further justification is required.

**Public realm and town centre enhancements**

17. It is not clear from the SPD why it is considered necessary for new residential development to make contributions to the improvements of the public realm. While improvements to the public realm are to be welcomed it is not for all residential development to pay for those improvements and certainly not necessary to make those developments acceptable in planning terms and which are not directly related to the development. The decline in the quality of public realm has not been due to residential development but under investment by the Council. This charge should be removed from the SPD.

**Future Engagement**

18. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider housebuilding industry.

19. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

[Redacted signature]

**Mark Behrendt**

**Regional Planning Manager – SE and E**

[Redacted contact details]

[Redacted contact details]

Planning Service  
Medway Council  
Gun Wharf  
Chatham  
Kent  
ME4 4TR

29<sup>th</sup> April 2026

Dear Sir/ Madam

**Representation to the Medway Developer Contributions and Obligations Guide  
(Draft for Consultation – February 2026)**

**SR5 (Policy SA6): Land West of Stonehorse Lane, Strood**

We welcome the opportunity to respond to the Medway Council's Draft Developer Contributions and Obligations Guide (February 2026). The Draft Guide's purpose is to inform and assist developers, Council staff and stakeholders to *ensure the impacts of developments are properly mitigated; that there is clear information on the Council's policy for developer contributions; that there is consistency, transparency and accountability; to provide a streamlined, efficient service and achieve greater speed in determining planning applications.* This is most welcomed as the approach is considered to be more explicit than that of neighbouring authorities, providing an itemised, per-dwelling tariff.

This representation has been prepared on behalf of Brookworth Homes and is made in relation to a development site identified within the SHLAA 2023 as 'SR5', previously referred to as 'Land North of Brompton Farm Road' and allocated within the submitted Local Plan 2041 under Policy SA6: Land West of Strood as 'SR5: Land west of Stonehorse Lane', for up to 120 dwellings, alongside sites SNF1 & SNF3 for a total supply of up to 1280 dwellings.

The National Planning Policy Framework (NPPG) refers to viability in plan making. It confirms:

*"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan." (Our emphasis)*

This representation has been prepared with the above policy as an overarching consideration.

**Affordable Housing Contributions**

The most recent changes to the NPPF regarding the release of Green Belt land and the introduction of the 'Golden Rules', require that major development involving the provision of housing proposed on land released

from the Green Belt through plan preparation or review contribute affordable housing at *15 percentage points above the highest existing affordable housing requirement that would otherwise apply to the development* (subject to a 50% cap), as stated in paragraph 157 of the NPPF (2024). Policy T3: Affordable Housing of the **submitted (Regulation 22) Local Plan 2041 requires land in 'high value areas' to provide 30% affordable housing, 25% in 'lower value areas' and 10% in previously developed land**. This would indicate a 45% affordable housing provision on land released as a green belt in high-value areas, such as the West of Strood<sup>1</sup>, where site SR5 lies.

However, the Guide makes no mention of the 45% affordable housing requirement for land released from the green belt, providing no guidance on the viability of these sites, and Section 5 makes no mention of the Golden Rules requirement for affordable housing provision and delivery, specifically in relation to Strategic Sites. In this respect, there is conflict with the Planning Practice Guidance (PPG) that *"It is important to consider the specific circumstances of strategic sites."* Paragraph: 005 Reference ID: 10-005-20180724

The 2025 Viability Assessment<sup>2</sup> states in paragraph 10.24(d) that, **'only the larger (over 200 units) sites are likely to be able to bear 45% (30% + 15%) or more affordable housing'**, when referencing sites to the west of Strood and south of the M2 and west of the River Medway as those within the Green Belt. This would mean sites proposed for release from the green belt and for major development of over 200 units would be unable to deliver both a 45% affordable housing provision and full Section 106 contributions **based on the Council's** own evidence base, and one can infer that smaller sites, such as SR5, cannot bear the cumulative impact of 45% affordable housing and significant Section 106 contributions.

Furthermore, it may be more appropriate for the Council to consider introducing a Section 106 exemption similar to those available to Community Infrastructure Levy (CIL) charging authorities, whereby affordable homes could be excluded from S106 contributions. In this respect, the contributions would reflect the relief available for affordable homes in CIL charging authorities according to Regulation 49A of the Community Infrastructure Regulations 2010 (as amended), which enables a Charging Authority to apply discretionary social housing relief within the area of the chargeable development.

### High Developer Contributions

Paragraph 57 of the NPPF (2024) states that

*"planning obligations must only be sought where they meet all of the following tests (Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010):*

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

This puts into question whether the *contributions that may be sought to mitigate the impact of growth*, as specified in Section 4.1.2, meet the above tests, given the additional requirement for developer contributions from the Kent and Medway NHS, signposted in paragraph 4.1.5 and stated in Table 1. According to paragraph 4.1.3, **'The Summary of Contributions', Table 1, provides a list of services that typically request contributions**

---

<sup>1</sup> The Local Plan 2041 does not define 'High value areas' nor does it provide a map of their location, with the only indication of these being that stated under Policy T3 as *'...In high value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites...'* It is therefore assumed that the West of Strood is a 'High Value Area'.

<sup>2</sup> Medway Council Local Plan Viability Assessment Update – June 2025

as a quick reference point, but does not include Local Plan requirements relating to strategic sites and policies. Implying that the total amount of contributions sought could be higher.

The Summary of Contributions, shown in Table 1 of the Guide and summarised in Appendix 1, adds up to a total of £48,660.44 per dwelling. With the benchmark of most of the contributions set at *10 units and above or combined GIA of 1000 sq.m*<sup>3</sup>. However, it is worth noting that some of the thresholds in Table 1 contradict those stated under the individual sections of the guide. For example, 'Heritage and Museums', as stated in paragraph 9.3.7, would only apply to *developments within 1,000 meters of [par. 9.3.1] the Rochester and Upnor Castles, Temple Manor in Strood, Eastgate House and the Guildhall Museum in Rochester and the Brook Pumping Station in Chatham*, and 'Public Real and Town Centre' only applies to (par. 23.2.1) 'the core retail and adjoining areas'.

This would imply that, based on the guide, the minimum amount of contribution sought by the council could be between £23,836.76 – £48,660.44<sup>4</sup> per dwelling, before affordable housing obligations, unless challenged by the developers through viability testing (which, at present, grey belt sites cannot pray in aid of).

This is further suggested in Section 3.5, **stating that 'The Council's initial negotiations will generally be based on this guide. Only where there are good and valid reasons for departing from the guide will alternatives be considered.'** However, it is unclear if this applies to deviating below the 'normal level of contributions' as well as above it, as stated in Section 3.5.2, which states that (*as an example*), *where the 'normal' level of contribution is genuinely unaffordable, in which case the developer should inform the Council as quickly as possible and provide detailed financial evidence to substantiate the claim. Only where comprehensive evidence is provided will it be possible for the Council to consider such departures, and in these cases an 'open book' approach will be required.*

Further clarification is required as to what a 'normal' level of contribution would represent. Furthermore, this suggests the Council is opting for a "ask for everything and negotiate down" approach. This could have significant delays in the negotiation of Section 106 (S106) contributions, as extensive evidence would need to be provided by developers through every major development to agree on the most reasonable level of contributions, going against the Guide's objective to *provide a streamlined, efficient service and achieve greater speed in determining planning applications*, as well as paragraph 57 of the NPPF (2024) with particular regard to criteria 'a' which states planning obligations must only be sought where they are *necessary to make the development acceptable in planning terms*.

Whilst we welcome the Council's acknowledgement that the Guide is not hard and fast, noting it confirms "*For sites in strategic growth areas, Medway Council will negotiate on a case-by-case basis with priorities given to strategic infrastructure requirements set out in the site allocation policies. Depending on individual site viability, additional contributions will be requested.*" The Council need to inject a serious dose of realism into its starting point to prevent conflict with paragraph 58 of the NPPF.

Written Ministerial Statement April 2026

---

<sup>3</sup> except for those required by the NHS, with thresholds of 20 and 300 dwellings, and Bird disturbance mitigation (SAMMS) threshold of 'within the SPA and RAMSAR 6 km buffers'.

<sup>4</sup> Shown in Appendix 1, where the minimum does not include service areas with alternative thresholds (highlighted in green), these are: 'Bird disturbance', 'Heritage and Museums', 'Public Realm and Town Centres' and 'Secondary/acute care', and it excludes Education and Library contribution duplications (i.e., expansion and new build), with the lowest figure only including 'Expansions'.

The Minister of State for Housing and Planning, Matthew Pennycook, released a statement on the 28<sup>th</sup> of January 2026<sup>5</sup>, calling for a more effective S106 system. The statement highlights the current inefficiency of the S106 system, which frequently causes delays, stating that negotiations can be slow, complex and costly, which in turn is slowing down housing delivery, especially of affordable housing.

Amongst the Minister's recommendations is for Local Planning Authorities to renegotiate S106 agreements to unlock stalled sites, stating the following:

*For this reason, as of today, we expect all LPAs to take advantage of existing planning flexibilities to renegotiate S106 agreements and allow the tenure of homes to be varied in order to secure a buyer where affordable homes secured in S106 agreements remain uncontracted or unsold. This can be effected by a deed of variation – making amendments/revisions to existing S106 agreements – either by agreement of the parties to the S106 or by formal application under S106A of the Town and Country Planning Act 1990*

This intervention is due to thousands of S106 affordable homes, which would generally be sold to Registered providers (RPs) of Social Housing, sitting vacant without buyers, highlighting the reduced capacity of PRs partly due to rising finance and construction costs.

**It is important that the Council considers the Minister's statement during S106 negotiations and through the process of amending the Developer Contributions Guide based on this consultation, as this exemplifies the snowball effect that Development Costs have on housing affordability and provision. This Ministerial Statement should set the backdrop against which the Guide is considered.**

#### Viability of proposed Developer Contributions on Development

According to the executive summary, the Guide is intended to serve as the *basis for Medway's response to proposed strategic growth strategies*, as well as provide *evidence for the infrastructure delivery planning and viability assessments that underpin the Local Plan*. However, the most recent Viability Assessment was published in 2025, which tested the viability of the draft allocations based on now-outdated data (such as BCIS construction rates), and it tested the sites on S106 contributions ranging from £18,115 to £35,616<sup>6</sup>, with a number of sites being tested in groups, and not in isolation, organised by their geographic location to reflect **the Local Plan's Policy allocation. For example, the viability of SR5 was tested alongside SNF1, SNF2 and SNF3** for a total of 1280 dwellings<sup>7</sup> (Policy SA6), despite sites coming forward in isolation (potentially as part of a previously agreed masterplan, as per draft policy requirements), providing misleading information about the viability of the sites, as the development value and costs of a site of 122 dwellings on around 4 hectares with a 45% affordable housing contribution would drastically differ from that of an 800 to 1280-dwelling development. Understating that quoted in paragraph 5.3.4 from the Viability Assessment.

Despite an outdated and misleading viability Assessment, the Medway Developer Contributions and Obligations Guide recognises that for many sites, especially brownfield, high-density or regeneration sites, produce a negative Residual Value. It is therefore believed that an updated Viability Assessment in line with the Median 2026 BCIS Construction costs, as opposed to the Lower Q; higher S106 contributions, as suggested by the Guide; additional policy requirement costs, as well as **(at least) the minimum 'other normal development costs'**

---

<sup>5</sup> <https://questions-statements.parliament.uk/written-statements/detail/2026-01-28/hcws1286>

<sup>6</sup> Sites 1 – 29 were assigned a £18,115 contribution, Site 32, £35,616, and Sites 30, 31, 33-5 were tested under a contribution range of £20,339 - £26,046, with Site 35 being assigned £22,859.

<sup>7</sup> Page 350 of the 2025 Viability Assessment tests the viability of SA6 as a whole under 'Site 35'

suggested in Section 7 of the Viability Assessment, would show most greenfield sites as producing a negative residual value or a residual value that is under the benchmark/Existing Use Value.

To demonstrate this, a rough assessment has been conducted to give an indication of the Residual Value of a site such as SR5 with an existing Agricultural Use at 4.37 ha for 120 dwellings. The workings of these calculations are shown in Appendix 2 and summarised below<sup>8</sup>.

**Government guidance on 'Financial Viability for housing-led projects'**<sup>9</sup> states that *the residual land value is derived from the value of the completed development (net) minus the development costs, including the developer's profit. If costs exceed GDV, there is no land value, and the scheme is unviable.* Where Residual Land Value, defined as *the amount the developer can afford to pay for land for the project to be viable*) is calculated using Gross Development Value – Total Development Costs (Including Profit)

Based on the 2025 BCIS Data provided in Appendix 10 of the Local Plan Viability Assessment<sup>10</sup>, the median cost of construction for Flats, Detached, Semi-Detached and Terraced Estate Housing was used to determine the cost per sqm using a range of average sqm for each housing typology, shown in Table 2 of Appendix 2. This was used to determine the construction cost per dwelling, shown in Table 1 of Appendix 2.

**Developer costs were calculated according to the council's 2025 Viability Assessment, as a percentage of the construction costs, shown below (Land costs and abnormal costs have been excluded for this exercise):**

- Site Costs (roads, drainage and services within the site, parking, footpaths, landscaping and other external costs): 15%
- Fees (Professional Fees & Assessments): 10%
- Contingency: 2.5%
- Finance Costs (VAT, Interest rates): 7%
- Acquisition & Disposal Costs: 4%

Based on the Policy SA6 requirements and the Developer Contributions Guide, S106 contributions have been estimated at £31,748.49 per dwelling for SR5, which includes the minimum contributions identified in Appendix 1, except for Education contributions, which only include those required under policy SA6, this is shown in Table 3 of Appendix 2.

Finally, a 20% Profit for Market Housing and a 6% Profit for Affordable Housing<sup>11</sup> were used, as recommended in the 2025 Viability Assessment. This information was used to determine a possible Total Development Cost of a 122 dwelling development at 45% affordable housing. This was compared against the Gross Development Value, based on average house prices in the district according to Rightmove (Shown in Appendix 2), with affordable housing development value calculated at 20% lower, to estimate a Residual Land Value.

The calculations show that using the estimated amount of Developer Contributions for SR5 based on the Guide at £31,748.49, the Gross Development Value is marginally lower than the Total Development Costs at a **negative**

---

<sup>8</sup> Figures provided are merely illustrative and should not be considered to be an accurate representation of the cost and value of the development.

<sup>9</sup> <https://www.gov.uk/guidance/financial-viability-for-housing-led-projects>

<sup>10</sup> Medway Council Local Plan Viability Assessment Update – June 2025

<sup>11</sup> To provide a rough indication of the Residual Value, these figures do not consider varied tenures as required by affordable housing policies.

£11,433.35<sup>12</sup>. Not enough to cover the recommended Existing Use Value (EUV) Plus suggested in the 2025 Viability Assessment for Greenfield Strategic Sites at EUV x 12.5. Given the existing use of the site is Agricultural, the EUV Plus would come to £2,021,125.00.

However, the exercise also showed that even at the Lowest Scale of the S106 Contributions identified in Appendix 1, the Residual Land Value might still be insufficient to cover land costs, with a Land Value of £1,074,281.13. This illustrated the unviability of the proposed levels development contributions in light of increasing construction and developer costs, a situation only likely to be exacerbated by global conflicts and a stagnant housing market.

### Unallocated S106 Funds

Furthermore, it is worth highlighting that according to the 2024/2025 Infrastructure Funding Statement (IFS)<sup>13</sup> the Council holds at least £13,123,522.15 in unallocated S106 funds. This amount is substantial, and puts into question the effectiveness of developer contributions to fund the delivery of infrastructure and community amenities. This was highlighted in a recent Housing Builders Federation publication<sup>14</sup> which found that *there is a growing mismatch between the developer contributions councils hold and the timely delivery of new infrastructure and community amenities*. With an estimated £9 billion in developer contributions help unspent across England and Wales, *including around £3 billion held for more than five years*. It is therefore essential that the Council takes into account existing unallocated funds when negotiating S106 agreements or dismissing planning applications due to infrastructure pressures.

### Temporary Housing Costs

By stymying development through excessive S.106 contributions and delaying the delivery of much needed affordable housing, the Council is causing itself a significant amount of financial harm.

Through information obtained under a Freedom of Information Request (Appendix 3), **the Council's** gross cost of temporary accommodation in 2017/18 was £3,384,966.55. This has risen dramatically and stands at £10,335,143.01 for 2024/25. If the Council adopted a more reasonable approach to S.106 contributions, stalled development could come forward, delivering additional affordable homes to relieve the burden on the **taxpayers'** purse in respect of temporary accommodation. Through the level of contributions currently proposed, the Council is cutting off its nose to spite its face.

### Conclusion

The NPPF is emphatic that the level of contributions **"should not undermine the deliverability of the plan"**. The Government provided a timely reminder in respect of viability through the recent WMS, confirming the expectation is that **"all LPAs to take advantage of existing planning flexibilities to renegotiate S106 agreements"**. This should be used as **a prism through which the Council's Guide is viewed**.

**The Council's approach to** strategic growth areas, whereby it will negotiate on a case-by-case basis with priorities given to strategic infrastructure requirements, lacks clarity for applicants who need to bring forward sites. Whilst we welcome the opportunity for dialogue with the Council as opposed to being bound by a set of rigid (and unworkable) contributions, the Council must recognise that grey belt sites cannot invoke a viability

---

<sup>12</sup> Figures provided are merely illustrative and should not be considered to be an accurate representation of the cost and value of the development.

<sup>13</sup> [https://www.medway.gov.uk/downloads/file/9529/infrastructure\\_funding\\_statement\\_2024\\_to\\_2025](https://www.medway.gov.uk/downloads/file/9529/infrastructure_funding_statement_2024_to_2025)

<sup>14</sup> <https://www.hbf.co.uk/research-insight/unsent-developer-contributions/unsent-developer-contributions-2026/>

assessment to row back from unviable contributions at the plan-making stage. This is an important issue that needs addressing now to enable much-needed housing sites to be brought forward confidently by developers.

## APPENDIX 1 – Medway’s Summary of Contributions with added totals

Service Area	Thresholds	Expected contribution (per dwelling)
Bird disturbance mitigation (SAMMS)	Applied to any new dwelling created within the 6km zone of influence of the protected sites, and up to 10km.	£337.49
Community services		£251.84
Heritage and museums	Only when development is within 1000 of Rochester and Upnor Castles, Temple Manor in Strood, Eastgate House and the Guildhall Museum in Rochester and the Brook Pumping Station in Chatham.	£391.28
Libraries – Expansion		£226.98
Libraries – New Build		£419.14
Youth centres and facilities		£107.64
Early Years – Nursery – Expansion		£2,541.88
Early Years – Nursery – New Build		£3,034.90
Education - Primary – Expansion		£6,239.16
Education - Primary – New Build		£7,449.30
Education - Secondary – Expansion		£6,038.77
Education – Secondary – New Build		£6,350.56
Education - Sixth form - Expansion		£1,589.15
Education – Sixth form – New Build		£1,671.20
Open spaces		£3,506.75
Indoor Sport and leisure		£334.63
Public Rights of Way (PRoW)		£75.00
Waste and recycling		£237.84
Public Realm and Town Centre Enhancements	Applies to core retail and adjoining areas	£369.81
Social Care		£287.12
Health – Primary care	20 or more dwellings	£2,000.00
Health – Community care	20 or more dwellings	£400.00
Health – Secondary/acute care	300 or more dwellings	£4,800.00
<b>ALL Contributions (x1)</b>		<b>£48,660.44</b>
<b>Possible Minimum Contributions</b>		<b>£23,836.76</b>

## APPENDIX 2

Average Dwelling Size (sqm)				Average Construction Cost per Dwelling			Construction + Developer Costs per Dwelling Type		
Typologies	Smallest Average (sqm)	Average Size	Largest Average (sqm)	Minimum	Median	Max	Minimum	Median	Max
Flats	38	54	70	£63,004.00	£101,844.00	£159,880.00	£87,260.54	£141,053.94	£221,433.80
Terraced	64	82	101	£90,048.00	£131,282.00	£186,648.00	£124,716.48	£181,825.57	£258,507.48
Semi-detached	90	95	100	£131,130.00	£158,080.00	£188,800.00	£181,615.05	£218,940.80	£261,488.00
Detached	130	21	160	£217,620.00	£400,260.00	£412,320.00	£301,403.70	£554,360.10	£571,063.20

Table 1 – Working Figures to determine Total Development Costs, showing the base construction costs and Developer costs (Excluding Land Costs)

BCIS Data - Estate Housing (2025)				
	Lower Q	Median	Higher Q	Mean
<b>General</b>	1,439	<b>1,628</b>	1,860	1,699
Single Storey	1,627	<b>1,883</b>	2,135	1,954
2-Storey	1,412	<b>1,584</b>	1,797	1,637
<b>Detached</b>	1,674	<b>1,906</b>	2,577	2,281
<b>Semi Detached</b>	1,457	<b>1,664</b>	1,888	1,722
<b>Terraced</b>	1,407	<b>1,601</b>	1,848	1,707
<b>Flats</b>	1,658	<b>1,886</b>	2,284	2,015

Table 2 – BCIS Data (Appendix 10 of Medway Council Local Plan Viability Assessment Update – June 2025)

**S106 Developer Contributions Estimate**    **£31,748.49**

Construction and Dev. Cost Plus S106 Contributions				Added 20% Profit			Affordable Housing <sup>1</sup> 6% Profit		
Typologies	Minimum	Median	Max	Minimum	Median	Max	Minimum	Median	Max
Flats	£119,009.03	£172,802.43	£253,182.29	£142,810.84	£207,362.92	£303,818.75	£142,810.84	£183,170.58	£265,720.56
Terraced	£156,464.97	£213,574.06	£290,255.97	£187,757.96	£256,288.87	£348,307.16	£187,757.96	£226,388.50	£310,208.98
Semi-detached	£213,363.54	£250,689.29	£293,236.49	£256,036.25	£300,827.15	£351,883.79	£256,036.25	£265,730.65	£313,785.60
Detached	£333,152.19	£586,108.59	£602,811.69	£399,782.63	£703,330.31	£723,374.03	£399,782.63	£621,275.11	£685,275.84
<b>MEDIAN AVERAGE</b>				<b>£366,952.31</b>			<b>£225,096.58</b>		

Table 3 – Working Figures to Determine Total Development Costs (Excluding Land Costs), showing Table 1 costs plus S106 and profit

**Gross Development Value**    **£36,362,634.26**

**District House Price Average<sup>2</sup>:**    £332,991.16

**Minus 20%:**    £266,392.93

**Total Development Costs**    **£36,374,067.61**

**Affordable:**    £12,155,215.08

**Market:**    £24,218,852.53

**Residual Land Value**    **-£11,433.35**

<sup>1</sup> To provide a rough indication, this figures do not consider varied tenures as required by affordable housing policies.

<sup>2</sup> Source: Rightmove

**S106 Developer Contributions Estimate**    **£23,791.04**

Construction and Dev. Cost Plus S106 Contributions				Added 20% Profit			Affordable Housing <sup>3</sup> 6% Profit		
Typologies	Minimum	Median	Max	Minimum	Median	Max	Minimum	Median	Max
Flats	£111,051.58	£164,844.98	£245,224.84	£133,261.90	£133,261.90	£294,269.81	£133,261.90	£174,735.68	£265,720.56
Terraced	£148,507.52	£205,616.61	£282,298.52	£178,209.02	£178,209.02	£338,758.22	£178,209.02	£217,953.61	£310,208.98
Semi-detached	£205,406.09	£242,731.84	£285,279.04	£246,487.31	£246,487.31	£342,334.85	£246,487.31	£257,295.75	£313,785.60
Detached	£325,194.74	£578,151.14	£594,854.24	£390,233.69	£390,233.69	£713,825.09	£390,233.69	£612,840.21	£685,275.84
<b>MEDIAN AVERAGE</b>				<b>£357,403.37</b>			<b>£216,661.68</b>		

**Gross Development Value**    **£36,362,634.26**

Affordable    £14,385,217.95

Market    £21,977,416.31

**Total Development Costs**    **£35,288,353.13**

Affordable    £11,699,730.64

Market    £23,588,622.49

**Residual Land Value**    **£1,074,281.13**

<sup>3</sup> To provide a rough indication, this figures do not consider varied tenures as required by affordable housing policies.





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

5 May 2026

Dear Planning Policy,

## **Medway Developers Contributions Guide Consultation - Response on behalf of Homes England**

### **Introduction**

Homes England is an executive non-departmental public body sponsored by MHCLG and acts as the Government's housing and regeneration agency. Homes England works in partnership with local authorities, developers, housing associations and other stakeholders to unlock land, accelerate housing delivery and support the creation of sustainable, well-functioning communities. As set out in Homes England's Strategic Plan 2023–28, its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places, supporting social justice across England. Central to this is a strong focus on design quality, environmental sustainability and placemaking, championing well-designed developments that create distinctive places where people can live, use and thrive.

Medway Council published the Medway Developers Contributions Guide (MDCG) 'draft for consultation', which commenced on 23rd March 2026. Homes England recognise the importance of keeping an up-to-date Local Plan evidence base and welcome the opportunity to provide comments on the MDCG consultation draft prior to any formal adoption noting that developer contributions can be key to achieving sustainable communities and thriving places. However, given the close relationship between the MDCG, the emerging Medway Local Plan, and its supporting evidence base, Homes England seeks clarity on a number of key matters raised in this response. These relate principally to the timing of adoption, the relationship with the Local Plan Examination process, and the lawful and proportionate application of developer contributions, particularly in the context of CIL Regulation 122 compliance.

### **Homes England Land Interests in Medway**

The Lodge Hill estate was transferred to Homes England from the MOD in early 2018. The former defence land at Lodge Hill, including the part of the site known as Chattenden Barracks has been in various military uses for over 140 years. WSP submitted representations on behalf of Homes England in September 2024 in relation to the Regulation 18b Draft Medway Local Plan and in August 2025 in relation to the Regulation 19 Draft Medway Local Plan 2041 consistently promoting

OFFICIAL



the land interests of Homes England; seeking to include the Chattenden Barracks site as a residential allocation in the draft Plan and Lodge Hill Camp for a mix of non-residential uses.

Following this Local Plan site promotion and further engagement with Medway Council through a Planning Performance Agreement (PPA), WSP recently submitted an Outline Planning Application (OPA) to Medway Council on 26<sup>th</sup> February 2026 on behalf of Homes England for a high-quality landscape-led residential led development, incorporating new homes alongside potential small-scale Class E uses (subject to demand), open space and supporting infrastructure

### **1. Adoption Timing – Emerging Local Plan Polices**

It is understood that following the closure of the MDCG consultation period on 5 May 2026 a report on the consultation responses and any proposed changes will be presented to the Regeneration, Culture and Environment Overview and Scrutiny Committee on 24 June 2026. Following this committee the final SPD would then need to be ratified for adoption by Cabinet, which could be from early July onwards and appears to be in advance of (and premature to) the intended draft Local Plan Examination. Alternatively, the Council could (and should as we contend below) continue to progress a new MDCG as part of their emerging Local Plan evidence base and consult and examine as part of that process which then would be published ‘alongside the new Local Plan’ as intended and set out at paragraph 1.3 of the current MDCG and Obligations 2018 (updated April 2026).

Whilst the draft MDCG broadly reflects the policies set out within the Submission Version of the Medway Local Plan, Homes England contends the draft MDCG should not be adopted prior to the emerging Local Plan policies being fully tested for soundness at the Local Plan examination and the Medway Local Plan is formally adopted, on the basis that there has been no opportunity for prior consultation on this emerging document as part of the Local Plan process. It is noted that the Planning Inspectorate has also queried this point in the context of wider initial queries to your Council’s Local Plan submission. Nevertheless, there should be an opportunity for the Planning Inspectorate and interested parties to comment on and test the position of this document as part of the overall draft Plan at an Examination which is scheduled for this year.

A Supplementary Planning Document (SPD) should not introduce new planning policy, and this proposed SPD is predicated on emerging policy which has not yet been fully tested. Due to the nature of the draft MDCG, even a slight change in policy wording carried forward from the Examination of the draft Plan, for example, in relation to housing tenure or affordable housing could have a notable impact on the level and nature of developer contributions that would be applicable for major developments in particular. Moreover, if adopted prior to the Local Plan Examination, any changes to the policy standards/wording would result in the MDCG being out of date at the time of the Local Plan adoption and would therefore require immediate update. Therefore, to reiterate, it is strongly opined that the adoption of the draft MDCG should not take place until the emerging Local Plan has been adopted and the polices therein sufficiently tested as a whole.



## **2. Adoption Timing – Local Plan Evidence Base Topic Papers**

In addition to the Local Plan policy testing at Examination, the Local Plan evidence base topic papers published as part of both the Regulation 18 and Regulation 19 consultation are also yet to be scrutinised at Examination by interested parties and the Inspectors. The topic papers will form part of the evidence base for the Local Plan and therefore must be accurate and should be scrutinised at Examination accordingly. It has been noted that there (in some cases) significant increases in contributions set out when comparing the MDCG (April 2025) and the updated version published in April 2026 to reflect indexation, with the consultation draft (dated February 2026). These changes have not been subject to public consultation or scrutiny at Examination and therefore adoption of the MDCG prior to the adoption of the Local Plan would fail to follow due process.

The 'Local Plan Viability Assessment 2025' (dated June 2025) was published as part of the Local Plan Regulation 19 consultation but has not yet been inspected at the Examination. The Viability Assessment makes reference to the current Developer Contributions SPD (2025 update at that time) with additional unqualified assumptions on public realm and PROW contributions included. Affordable housing assumptions have been tested in the Viability Assessment concerning the proposed allocations, but they have yet to be scrutinised at Examination. Furthermore, the updated contribution figures and expansion of categories subject to this SPD consultation do not appear to have been considered in the Regulation 19 documents either. This is a key example of the lack of consistent approach around the formulation of future Local Plan policy regarding the scale and application of development contributions.

### **Local Plan Matters, Issues and Questions**

We are aware that the Planning Inspectorate are yet to publish their Matters, Issues and Questions around the submitted Plan which could raise specific questions about the evidence base. As such it remains unclear if these documents will be found 'sound' or will require further modification. The proposed contributions set out in Table 1 of the draft MDCG 'Summary of contributions' are reflective of the findings of the aforementioned Viability Assessment which is a live document. Therefore, Homes England reiterate a view that the timing for adoption of the MDCG should be after or at the same time as the adoption of the emerging Medway Local Plan, at a time where it has been determined as part of the Examination process that the evidence base documents (including the draft MDCG, Viability Assessment and Infrastructure Delivery Plan (IDP)) are 'sound', especially considering the financial impact of the updated MDCG

It is pertinent to note that the draft MDCG and the final IDP were not part of the evidence base published as part of the Regulation 19 Local Plan consultation in July-August 2025 and were only published on the Medway Council Examination Library on 18<sup>th</sup> December 2025. Therefore, there was not an opportunity for interested parties to comment on these key documents in conjunction with the Regulation 19 consultation documentation at the time. Furthermore, the draft MDCG should reflect the findings of an updated and examined IDP. Although Homes England does acknowledge the opportunity provided now to provide comment on the draft MDCG, it is noted that there has not yet been an opportunity to formally comment on the final IDP in conjunction with the draft MDCG nor has this been through the examination process.



### 3. CIL Compliance – Standardised Approach

Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) which requires planning obligations to be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development.

Homes England seek clarity on how the MDCG will be applied in situations where a nuanced approach is more appropriate, which is particularly important for sites with unique characteristics where a standardised approach may not deliver the most appropriate community benefits. For example, the consultation draft MDCG reintroduces a Great Lines Heritage Park contribution which was previously included in the 2008 version. However, in the current draft MDCG this is required to be 5% of the overall S106 contribution which is increased to 10% for developments within 700m. The draft MDCG states in paragraph 15.1.5 that the Great Lines Heritage Park is '*an asset for the whole of Medway*'. However, no evidence is provided as to how this complies with CIL regulations and is necessary, directly related to all development, or how this is reasonably related in terms of scale to all development in Medway. This charge has also been excluded from the summary of contributions in table 1 of the draft MDCG.

In addition, some development contributions are proposed to significantly increase from the adopted position. When Medway Council are considering the application of these flat rate charges i.e. per dwelling contributions, it will be essential for the Council to consider if this flat rate levy is necessary and directly relevant to make the development acceptable when the proposals may not have a significant impact in planning terms on certain topics due to mitigation measures proposed as part of the planning application. It is also unclear from the draft MDCG how contributions will be spent i.e. building new facilities or extending existing facilities; therefore, it is challenging to understand how contributions will be CIL compliant. It is also important to understand how other funding sources are taken into account and what proportion of funding will be received from government funding, for example in relation to social care or NHS Acute Care and this should be made clear in the MDCG.

Therefore, Homes England seek confirmation that the draft MDCG will be implemented in a manner compliant with Regulation 122 of the CIL Regulations 2010 and ensure that obligations are directly related to the development rather than constituting a flat rate standardised charge. If there are not currently provisions in place to ensure contributions are necessary, directly related to the development and fairly and reasonably related in scale, Homes England suggest that appropriate caveats are incorporated to all proposed levies to ensure CIL compliance can be achieved.

### 4. Evidence Base – Use of Third Party Evidence

Similarly to the points raised at item 2 of this letter, Homes England note that the mechanism for calculating some of the proposed levies within the draft MDCG is through the utilisation of third party evidence which has not necessarily been consulted upon i.e. Kent and Medway ICB Evidence and the information set out in their developer contributions guide. Owing to the lack of consultation that can be guaranteed for all forms of third party evidence there are potential issues when utilising these to form the basis of the developer contributions proposed in the draft MDCG, especially due to this evidence not always being published in the public domain. In addition, the MDCG should be based on up-to-date evidence and forecasts to ensure CIL compliance.



Therefore, Homes England recommend that the draft MDCG and the documents that inform the draft MDCG are subject to robust scrutiny at the upcoming Local Plan Examination anticipated to take place later this year. This will ensure that when adopted the MDCG is legally sound and that all evidence base documents including from third party sources are made publicly available.

## **Conclusion**

Homes England supports the principle of updating the Medway Developer Contributions Guide at the appropriate time based on an up-to-date and tested evidence base and welcomes the opportunity to comment at consultation stage. Homes England recognises the importance of securing appropriate infrastructure alongside development to deliver sustainable communities and thriving places and accepts that the MDCG will play an important role in supporting this objective once adopted.

However, for the reasons set out in this response, Homes England considers that the MDCG should not be adopted in advance of, or independently from, the adoption of the emerging Medway Local Plan. The draft MDCG directly relies on emerging Local Plan policies and evidence base documents which have yet to be tested for soundness through the Examination process and may therefore be subject to modification. Premature adoption of the MDCG risks creating uncertainty and inconsistency, particularly where even minor amendments to Local Plan policies could materially affect the scale, nature or justification of developer contributions.

In addition, Homes England seeks assurance that the MDCG will be applied flexibly and lawfully on a site-by-site basis, in full compliance with Regulation 122 of the Community Infrastructure Levy Regulations 2010. It is essential that contributions are demonstrably necessary, directly related to development, and fairly and reasonably related in scale and kind, particularly for complex or strategically important sites such as Chattenden Barracks. Homes England therefore welcomes the Council's stated intention to apply certain contributions, including health and PRow, on a case-by-case basis and recommends that clear and consistent caveats are embedded throughout the MDCG to ensure this approach is applied across all levy types; this could be made clear by stating "contributions will be sought only where Regulation 122 tests are met".

Finally, Homes England considers it important that the draft MDCG, together with the evidence that underpins it (including third-party documentation), is afforded appropriate scrutiny through the Local Plan Examination process. This will help to ensure that, when adopted, the MDCG is robust, legally sound, and aligned with the final adopted Medway Local Plan post-Examination.

Homes England looks forward to continued constructive engagement with Medway Council as both the Local Plan Examination and MDCG consultation progress, and would welcome further dialogue on adoption timing, implementation arrangements and site-specific application of developer contributions.

Yours faithfully

**WSP**

## 1. Introduction

- 1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Catesby Strategic Land Limited ("Catesby") to prepare representations to the Medway Developer Contributions SPD consultation (herein referred to as the Draft SPD).
- 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")

## 2. General Comments and Legal Framework

- 2.1 The legal requirements to produce Supplementary Planning Documents is set out in Regulations 11 to 16 of the Town and Country (Local Planning) (England) Regulations 2012.
- 2.2 Supplementary Planning Documents (SPD), once adopted, are a material consideration but should not introduce new planning policies into the development plan, as they are not formal development plan documents.
- 2.3 The National Planning Practice Guidance is clear that SPD's, "should not add unnecessarily to the financial burdens of development" (Paragraph: 008 Reference ID: 61-008-20190315)
- 2.4 The financial developer contributions sought in this SPD are to be collected through planning obligations, normally within legal agreements such as S106. The PPG offers the following direction about planning obligations (copied below for ease).

Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

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

These tests are set out as statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. These tests apply whether or not there is a levy charging schedule for the area.

See related policy: National Planning Policy Framework paragraph 56

Paragraph: 002 Reference ID: 23b-002-20190901

Revision date: 01 09 2019 See previous version

- 2.5 Catesby consider the SPD results in financial contributions from new residential development, which risks developments becoming unviable. The Draft SPD sets out that financial contributions in some cases would not be required to make the development acceptable in planning terms and would fairly and reasonable related in scale and kind to the development. This is explored further below.
- 2.6 Catesby is a Member of the Home Builders Federation and is aware of their representation on behalf of the industry and strongly supports their comments.

### **3. Contribution Specific Comments**

#### **Self- Build and Custom Housebuilding**

- 3.1 Paragraph 6.3 requires that any plots remaining unsold after a 12-month marketing period are first offered to the Council for affordable housing purposes. As these units are designated as market housing within the development and are to be delivered and sold accordingly, it is not considered reasonable to require the developer to offer them to the Council before they are completed and marketed as open market homes. There is precedent from the examination of the St Albans and Spelthorne Local Plans, that such a requirement is not sound and therefore the text should be amended as follows:

6.3.2 If any plot(s) remain unsold after being marketed for the minimum period, will be returned to the developer to be built out as market housing.

#### **Cultural Services,**

##### *Cultural and Community Infrastructure*

- 3.2 Catesby has reviewed the evidence base underpinning the requirement for £251.84 per dwelling. It appears the Council relies primarily on this figure being carried forward from the currently adopted guidance, rather than on any up-to-date or site-specific justification. However, no substantive evidence has been provided to demonstrate that the proposed development would give rise to a demonstrable strain on existing facilities, nor that such facilities would require improvement, replacement, or expansion as a direct consequence of the development. There is also no published assessment identifying specific facilities that would be affected or explaining how any resulting contributions would be allocated or utilised.
- 3.3 Accordingly, there is insufficient evidence to demonstrate that the proposed per-dwelling contribution is necessary to make the development acceptable in planning terms, or that it directly relates to the proposed development as required by the tests set out in the CIL Regulations. In particular, the Council has not shown that the contribution is fairly and reasonably related in scale and kind to the development. Reliance on a legacy figure from the adopted SPD, without robust and up-to-date justification, is therefore inappropriate. The contribution should be removed unless and until it is properly evidenced in accordance with the relevant legal tests.

##### *Libraries*

- 3.4 As with other cultural and community infrastructure, any increased demand for libraries and archive services generated by residents of new housing will be supported through council tax receipts from those households. If a new library is required as a direct consequence of growth in a specific location, this should be clearly identified and justified within the Local Plan, alongside a robust assessment of the associated delivery costs. It is not appropriate to impose a standard per-dwelling charge on all new homes in response to such requirements and therefore this should be deleted.

### **Education**

- 3.5 Catesby fully supports the HBF's comments. It is considered that Medway's pupil number estimates are based on outdated evidence, despite more recent guidance reflecting declining fertility rates. There is no justification for relying on older assumptions when more current data is available.
- 3.6 Concerns are also raised about Medway's methodology for calculating pupil yields from new housing. Their approach appears to rely on numbers of dwellings rather than bedrooms, which is not supported by evidence as a reliable basis for estimating pupil demand. As a result, there is a risk that their method overestimates pupil yield, leading to contributions that are not proportionate to the scale of development.
- 3.7 Catesby supports the HBF conclusion of:

"If the Council are to update the costs relating to education, it must both update the evidence relating to pupil yield to reflect changes in fertility rates and other demographic changes since 2005 and set out the pupil yield on the basis of number of bedrooms rather than flats and houses. Without these changes the proposed contributions cannot be considered to be justified or consistent with the tests for planning obligations in paragraph 58 of the NPPF."

### **Health**

- 3.8 The contributions sought by the NHS Kent and Medway and Integrated Care Board are significantly increased from the current adopted position of the Council. It is clear from the ICBs Developer Contribution Guide (2025) that figures are indicative, and each case should be considered on its own merits. The Council has not accurately portrayed this position and looks to standardise a fee across new development. It should be made clear in the SPD that each case should be considered on its own merits, and as such a bespoke figure for new development should be created based on its likely impact on existing services.
- 3.9 Catesby also fully support the HBF comments that new housing should not be made to fund any gaps that have resulted from lack of national funding or poor planning by the ICB. Financial contributions sought from new development must meet the legal tests, and Medway should reassure itself that this Draft SPD reflects that.

### **Social Care.**

- 3.10 There is no justification for this contribution. While the Council acknowledges it is not currently meeting its duty in relation to social care provision, addressing that shortfall is a matter for the Council itself, not the

housebuilding industry. It is not appropriate to require contributions from residential development towards the delivery of social care in Medway.

- 3.11 Provision for social care should be planned through the Local Plan, and any requirements placed on developers should be set out clearly within adopted policy. Developers of care homes, where relevant, are the appropriate parties to address such needs. This requirement is not necessary to make residential development of 10 or more dwellings sound in planning terms.
- 3.12 Furthermore, this matter is not included within the adopted Local Plan. As such, the Supplementary Planning Document (SPD) is attempting to introduce new planning policy through a mechanism that is not intended for that purpose, which conflicts with the legal role of an SPD.
- 3.13 For these reasons, the contribution should be removed.

#### **Open space and outdoor formal sport**

- 3.14 Paragraph 15.1.3 states that the requirement for open space provision will be assessed on a site-by-site basis. However, the Council has also proposed a fixed per-dwelling cost. This approach is inconsistent: if requirements are to be determined through individual site assessments, it is not possible to predetermine a universal per-dwelling charge.
- 3.15 In some areas, existing provision of open space and sports facilities may already be sufficient, meaning no additional contribution would be justified. In other cases, provision may be made on-site by the developer rather than through a financial contribution. A uniform charge, therefore, risks failing to reflect site-specific circumstances.
- 3.16 No clear evidence has been provided explaining how the proposed cost has been calculated or how the resulting funds would be allocated. The Housing Builders Federation (HBF) has also been unable to identify the evidential basis for the figure.
- 3.17 The Supplementary Planning Document (SPD) should not introduce new policy requirements beyond those set out in the adopted development plan. If the Council intends to introduce a standardised financial contribution for open space through the Local Plan, this will require robust justification and clear evidence. As it stands, Medway should reconsider this SPD insofar as it seeks to establish a position not supported by the current adopted development plan.

#### **Public Realm and town centre enhancements**

- 3.18 It is not clear that the SPD's requirement for residential development to contribute towards public realm and town centre enhancements is supported by specific policies in the adopted development plan. In the absence of such policy backing, the justification for securing financial contributions through planning obligations is unclear.
- 3.19 In any event, it is not demonstrated that such contributions meet the statutory tests set out in Regulation 122 of the CIL Regulations, particularly that they are necessary to make the development acceptable in planning terms and are directly related to the proposed development.
- 3.20 While improvements to the public realm are supported in principle, it is not evident that public realm enhancements are required to mitigate the impacts of additional residential development, nor that they

arise directly from it. The deterioration of the public realm appears to stem from historic underinvestment rather than impacts attributable to new residential development.

- 3.21 On this basis, the requirement should be reconsidered or removed from the SPD unless a clear policy basis and site-specific justification can be demonstrated.

## 4. Summary and Conclusion

- 4.1 Overall, the representations set out above demonstrate that several of the proposed requirements within the Draft Developer Contributions SPD are not sufficiently evidenced, do not clearly align with the statutory tests for planning obligations, and in several instances, risk introducing blanket financial burdens that are not demonstrably necessary to make development acceptable in planning terms.
- 4.2 The approach taken in the draft SPD appears, in places, 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.
- 4.3 In addition, the SPD in its current form risks straying beyond its intended purpose by effectively introducing new policy requirements and standardised charges that are not clearly supported by the adopted development plan. This is particularly concerning where site-specific circumstances would reasonably be expected to influence the need, scale, or form of any mitigation.
- 4.4 For these reasons, it is considered that the Draft SPD requires significant revision to ensure that all contributions are properly evidenced, justified, and applied in a proportionate and flexible manner. Where this cannot be demonstrated, the relevant requirements should be removed to ensure the SPD is consistent with national policy and the statutory framework governing planning obligations.
- 4.5 Catesby welcomes the opportunity to comment on further drafts of the SPD. However, this version is not suitable for adoption and requires significant amendment, along with re-consultation, in accordance with legal requirements and the Council's Statement of Community Involvement, given the scale of changes required.