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MEDWAY LOCAL PLAN 2041 EXAMINATION IN PUBLIC

Matter 13 Hearing Statement – Site Allocations (Policies SA1-SA14)

Iceni Projects Limited on behalf of Barratt David Wilson Kent ("BDW") (Representor ID: 915)

Introduction

1. This Hearing Statement is submitted on behalf of Barratt David Wilson Kent ("BDW") in respect of the Phase 2 Matters, Issues and Questions (Document ref. MLP/ED35) published as part of the Examination in Public ("EiP") into the emerging Medway Local Plan 2041, prepared by Medway Council ("the Council").

2. BDW is part of Barratt Redrow, the country's largest housebuilder, delivering over 17,000 homes annually across the UK, with a proven track record of delivering major new communities at key strategic locations in Kent.

3. BDW controls "Land north of Rede Court" (16.3ha, Site ref. SNF1), part of the Land West of Strood allocation under Policy SA6, one of the Local Plan's most important strategic locations. BDW intends to submit an application shortly, and SNF1 can come forward as the first phase of the allocation.

4. BDW **supports the draft Local Plan and the allocation of Land West of Strood**, which forms a key component of the only realistic spatial strategy capable of meeting Medway's housing needs in full. BDW's position on the Inspectors' key questions is set out below.

Matter 13: Site Allocations (Policies SA1-SA14)

General

Q13.3: Under the site-specific information tables for each site, how have the capacities been derived for the individual sites?

5. This is primarily for the Council to answer. In relation to SNF1, the capacity of up to 360 dwellings derives from the Council's evidence base, BDW's technical evidence submitted at Regulation 18 (September 2024) and Regulation 19 (August 2025), and extensive engagement with the Council, including two pre-application submissions.

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6. The Council's June 2025 Land Availability Assessment ("LAA")[1] identifies capacity for approximately 300 to 350 homes on SNF1, and the Sustainability Appraisal[2] assessed 360 homes. The Green Belt Exceptional Circumstances Topic Paper (December 2025)[3] confirms that densities were optimised using best practice guidance and developer information, so that estimates were realistic and consistent with heritage, landscape and urban design guidance. Policy SA6 therefore identifies a capacity of "up to 360 homes".

7. BDW has been consistent in its submissions that approximately 360 homes are achievable on the Site, supported by technical evidence testing this capacity against the Site's constraints and opportunities, including:

Document	Consultant & Date
Existing Utilities and Constraints Technical Note	Pell Frischmann (June 2023)
Biodiversity Net Gain Feasibility Assessment	Pell Frischmann (October 2023)
Flood Risk and Drainage Statement Drainage Constraints Plan	Pell Frischmann (October 2023)
Heritage Statement Follow up Built Heritage Impact Assessment	Iceni Projects (October 2023) Tetra Tech (July 2026)
Archaeological Site Appraisal Archaeological Desk-Based Assessment	Iceni Projects (October 2023) Tetra Tech (July 2026)
Landscape and Visual Appraisal and Green Belt Appraisal, Green Belt Appraisal Green / Grey Belt Assessment	Iceni Projects (October 2023) Iceni Projects (September 2024) Iceni Projects (March 2025)
Sustainable Transport and Pedestrian Accessibility Technical Note	Pell Frischmann (September 2024)
Topographical Survey	MK Surveys (June 2025)
GPR Survey	Pell Frischmann (September 2025)
Arboricultural Report	Lloydbore Ltd (November 2025)
Proposed access arrangements from Beaufort Road and Clinton Road	NEO Transport Planning (December 2025)

8. This work informed BDW's pre-application submission to the Council for up to 360 homes, which was the subject of pre-application engagement with officers in July 2025. This included a Vision

[1] Document ref. B1
[2] Document ref. A3.3, page G13
[3] Document ref. B22.4 Green Belt Exceptional Circumstances Topic Paper, paragraph 3.3.1.

Document, prepared by OSG Architecture. A follow-up pre-application request, also for 360 homes was submitted to the Council in August 2026.

9. Taken together, this evidence clearly demonstrates that SNF1 has capacity for 360 dwellings, with no significant barriers to its delivery.

Q13.4: Under the site-specific information tables for each site, how has the plan period for delivery been decided for each site?

10. This is primarily a matter for the Council. However, BDW intends to bring forward SNF1 imminently, as demonstrated by its pre-application submissions and engagement with Medway Council. The LAA[4] confirms that SNF1, SNF2 and SR5 *"could come forward as independent developments regardless of Gravesham Borough Council's emerging local plan".*

11. The housing trajectory agreed in the Statement of Common Ground[5] between the Council, BDW, Bellway Strategic Land and Brookworth Homes shows delivery of housing on SNF1 in Years 4 to 11 of the plan period, with first completions from 2028/29. This broadly reflects the plan periods set out for SNF1 in the site-specific information table to Policy SA6 (years 1-5 and 6-10) and confirms that SNF1 can make an early and sustained contribution to housing supply.

Q13.5: Under the site-specific information tables for each site, how have infrastructure and utilities requirements been considered in the plan period for delivery, including any related flexibility?

12. This is primarily a matter for the Council to answer. However, in respect of SNF1, the site-specific information table to Policy SA6 identifies the land uses for the Site as *"Residential with opportunity for other TBD".* Policy SA6 does not set out the timing for the delivery of any infrastructure across the allocation as a whole, and the delivery of SNF1 is not, therefore, tied to the provision of specific items of strategic infrastructure at a particular point in the plan period.

13. SNF1 will contribute towards its share of the infrastructure required to support the allocation. This will comprise the on-site infrastructure needed to serve the Site and, where justified, proportionate contributions towards site-wide infrastructure, secured through a section 106 agreement and meeting the tests set out at paragraph 58 of the NPPF 2024.

14. As discussed at the Design Review Panel with Design South East in July 2026 for the whole of Policy SA6, SNF1 is not a suitable location for education facilities given its proximity to Strood Academy and the need for a central school serving a sustainable catchment within the wider development. Employment, local centres and sporting facilities should likewise be located centrally to serve the whole allocation. This allows SNF1 to come forward early, consistent with the agreed trajectory, while contributing appropriately to wider infrastructure.

[4] Document ref. B1 paragraphs 2.5.4 and 4.5.5
[5] Document ref. MLP/ED24F dated 9 September 2026

Policy SA6: Land West of Strood

Q13.59: How has the circa 1,280 capacity for this strategic allocation been derived (criterion 3.)?

12. This is primarily for the Council to answer. In respect of SNF1, the capacity has been derived as set out in BDW's response to Question 13.3. BDW is working with the Council, Gravesham Borough Council and the other landowners to prepare a site-wide masterplan which continues to test and confirm the capacity of each parcel within the context of the allocation as a whole.

Q13.60: Is the location of this strategic allocation consistent with national policy as regards encouraging modes of transport other than the motor car?

13. Yes. Paragraphs 110 and 115 of the NPPF 2024 direct significant development to locations which are or can be made sustainable, prioritising sustainable transport modes and safe and suitable access for all users.

14. The Council's Green Belt Exceptional Circumstances Topic Paper confirms that the allocation performed well in achieving sustainable growth, being on the urban edge of Strood District Centre, with services, facilities and public transport links[6]. Similarly, the Local Plan[7] notes that the location can *"[offer] the prospect of achieving sustainability ambitions."*

15. In respect of SNF1, the evidence submitted with BDW's Regulation 19 representations and pre-application requests demonstrates that the Site is in a highly sustainable location:

- the Site adjoins the existing urban area of Strood and is approximately 1.5km (a 20-minute walk) from the amenities of Strood Town Centre, with key local services and facilities, including existing primary and secondary schools, within 2km;
- six bus stops are located within 500m of the Site along Rede Court Road, and the 190 service from the Dillywood Lane stops on Gravesend Road provides three buses per hour between Gravesend, Strood, Rochester and Chatham;
- Strood railway station is approximately 2.6km from the Site (around an 8-minute cycle) and provides Southeastern and Thameslink services, including high-speed services to London St Pancras; and
- the A2 (Watling Street) has wide footways and cycleways on both sides, segregated from the carriageway, including a signalised toucan crossing at the junction with the B2108, and Gravesend Road has mandatory cycle lanes on both sides.

16. Proposals for SNF1, as part of the wider allocation, will build on this through a comprehensive internal network of pedestrian and cycle routes connecting to the existing residential area to the

[6] Document ref. B22.4 Green Belt Exceptional Circumstances Topic Paper, paragraph 3.2.2.
[7] Document ref. A1 paragraph 14.7.4

south, links to land to the north, and a Travel Plan. The Sustainable Transport and Pedestrian Accessibility Technical Note, prepared by Pell Frischmann (September 2024), estimates that these measures could reduce total car trips by circa 10%. The wider allocation also provides scope to explore a Fastrack route serving North Strood, consistent with criterion 7.b of Policy SA6.

17. The location of the allocation, and of SNF1 specifically, is therefore consistent with paragraphs 109, 110 and 115 of the NPPF 2024.

Q13.61: What ecology evidence has been used in the preparation of Policy SA6?

18. This is primarily for the Council to answer. However, in respect of SNF1, BDW has undertaken ecological work since 2023 to inform the promotion of the Site. A Preliminary Ecological Appraisal, including a UK Habitat Classification survey (September 2023), and a Biodiversity Net Gain Feasibility Assessment (October 2023) were prepared by Pell Frischmann. These confirmed that:

    - the Site is not subject to any statutory ecological designations and is dominated by cereal crops, with an area of hawthorn scrub, a line of trees on the northern boundary and hedgerows on the western boundary; and

    - the nearest designated sites are Rede Common Local Nature Reserve (approximately 300m), Great Crabbles Wood SSSI (approximately 1.1km) and Cobham Woods SSSI (approximately 1.2km), and development is not expected to have any significant impact on these.

19. A full suite of ecological surveys has been undertaken by Bakerwell. This work confirms that there are no ecological constraints which would prevent SNF1 from coming forward, and that biodiversity net gain and ecological enhancements in line with Policy SA6 can be delivered on site.

Q13.62: What affordable housing requirement (criterion 3. c) is the policy setting for this strategic allocation?

20. The Council needs to clarify the affordable housing requirement in light of its Viability Assessment and whether it is 40% or 45% for this Site.

Q13.63: Why are proposals for this strategic allocation to be landscape based (criterion 4.)?

21. The edge of settlement location and relationship with the wider landscape beyond are important material planning considerations. In respect of SNF1, it is a key factor that has influenced design considerations since inception, ensuring that the Site responds well to the landscape both pre and post the remainder of the allocation being delivered.

Q13.64: Who will be responsible for producing the green-blue infrastructure strategy (criterion 5.) for this strategic allocation?

22. The green-blue infrastructure strategy will be outlined in the final version of the Masterplan. However, this has been a key consideration in both the feasibility design work undertaken to date

in respect of SNF1, as well as the site-wide Masterplan and there is broad consensus on the site-wide infrastructure strategy between the parties.

Q13.65: Do the specific requirements for the strategic allocation set out in Policy SA6 (in particular, criteria 6. to 11.) concern only land in Medway?

23. BDW's understanding is that criteria 6 to 11 relate to the cross-boundary allocation as a whole and will be delivered through the site-wide masterplan required by criterion 12, rather than requiring each parcel to provide every element. The local centre and employment provision (criterion 9) relate to land west of Gravesend Road, within Gravesham Borough Council.

24. SNF1 will form a component part of the site-wide masterplan. It is able to be delivered independently, as noted within the LAA[8], while connecting to the wider allocation in terms of access and movement, sustainable transport, and open space and play space. In respect of education, employment, the local centre and playing pitches, SNF1 will contribute through connections to these facilities and, where justified, proportionate financial contributions, rather than through on-site delivery.

25. Any infrastructure requirements must be evidenced, with contributions meeting paragraph 58 of the NPPF 2024 and Regulation 122 of the Community Infrastructure Levy Regulations 2010. To be effective, the policy or supporting text should confirm that parcels within Medway can come forward in accordance with the approved masterplan, independently of the timing of development outside Medway.

Q13.66: Does Figure 12: Land West of Strood Concept Plan accurately show where infrastructure would be provided as regards Medway?

26. No. The masterplan being prepared by the landowners in conjunction with Medway Council and Gravesham Borough Council has moved on from Figure 12, taking into account the updated evidence base documents. As set out in BDW's Regulation 19 representations, Figure 12 is not considered effective or justified for the following reasons.

27. Firstly, the Concept Plan implies that residential development would be limited to the eastern portion of SNF1. The technical work and pre-application scheme demonstrate that residential development can be accommodated across the site, and Figure 12 should be amended accordingly.

28. Secondly, the potential location for a school on the western boundary of SNF1, on the border between Medway and Gravesham, is not supported by the evidence nor by Design South East or Medway's Education Officer:

[8] paragraphs 2.5.4 and 4.5.5

- a secondary or all-through school in this location would be within approximately 500m of Strood Academy, resulting in significant overlap of catchment areas and limiting parental choice;

- SNF1 is one of the smaller parcels within Policy SA6 and would not in isolation generate a need for a new school. The majority of the demand for education provision arises from the land within Gravesham;

- locating the school at the south-western edge of the allocation, rather than centrally, would increase the likelihood of car-based trips from land east of Gravesend Road, contrary to the Plan's Vision and Strategic Objectives; and

- the Council's Green Belt Review identifies the tree-lined historic administrative boundary between Medway and Gravesham as requiring preservation. A cross-boundary school in this location would be likely to compromise this boundary.

29. Thirdly, technical work demonstrates that access to SNF1 can be readily achieved from Beaufort Road and Clinton Avenue, with access drawings having been submitted to the Council as part of the pre-application process. Figure 12 should identify the access points it shows as potential primary access points, and should also show secondary access points serving SNF1, so that the Site can come forward in a timely manner as part of the wider masterplan.

30. These matters can be adequately remedied by a minor but important amendment to the Concept Plan, so that it is consistent with Masterplan principles established to date.

Q13.67: Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6?

31. In respect of SNF1, yes. The capacity of up to 360 dwellings has been derived having regard to the on-site infrastructure required to support development of the Site, including access, open space and play space, green and blue infrastructure, landscape buffers, SuDS, maximisation of on-site biodiversity net gain, and the easements for the existing water main and CLH pipeline.

32. SNF1 is therefore able to come forward with the appropriate infrastructure, with contributions towards off-site and site-wide infrastructure secured through a section 106 agreement where justified.

Q13.68: How are these infrastructure requirements justified, in respect of evidence?

33. This is primarily a matter for the Council to answer. BDW agrees that an allocation of this scale requires supporting infrastructure. However, the nature, scale, location and cost of each requirement must be founded on proportionate evidence[9].

[9] Paragraphs 35 and 36(b) of the NPPF 2024.

34. As set out in BDW's Regulation 19 representations, its Matter 3 Hearing Statement and its response to Question 13.66, the scale and location of the education provision under criterion 2, in particular the secondary school, has not currently been justified as required in accordance with the NPPF, PPG and CIL regulations[10].

35. To be justified and effective, the Council should publish a costed schedule of the infrastructure requirements for Policy SA6. For each item, this should set out the evidence of need, location, cost and apportionment, and it should inform the Infrastructure Delivery Plan required by criterion 14.

Q13.69: What proportion of the costs for infrastructure requirements under Policy SA6 are to be met by way of section 106 agreement, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6).

36. Land West of Strood is expected to deliver a significant package of infrastructure. Given this substantial cumulative cost, BDW needs a clear understanding of the cost of the infrastructure requirements, the proportion to be secured through section 106 agreements, and how costs will be apportioned between parcels and between Medway and Gravesham. Without this, it cannot be confirmed that the infrastructure and affordable housing requirements can be delivered together as required under the PPG[11]. It is not clear that the Local Plan Viability Assessment Update (June 2025)[12], which tests a contribution of approximately £22,531 per dwelling and primarily 30% affordable housing, reflects the full infrastructure costs.

37. Any section 106 contributions must accord with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended) and paragraph 58 of the NPPF 2024. For SNF1, contributions should reflect the impact of the 360 homes proposed; for example, any education contribution should be proportionate to the Site's pupil yield. Site-wide costs should be apportioned fairly across all parcels, so that early phases are not burdened with disproportionate or front-loaded costs.

38. To be justified and effective, Policy SA6, its supporting text or the Infrastructure Delivery Plan should set out the costed infrastructure requirements, the proportion to be met through section 106 agreements and the basis for apportionment, and confirm that contributions will be sought in accordance with Regulation 122 and paragraph 58 of the NPPF 2024.

[10] PPG Paragraph: 007 Reference ID: 10-007-20190509 and Community Infrastructure Levy Regulations 2010 (as amended), Regulation 122.
[11] PPG Paragraph: 001 Reference ID: 10-001- 20251216
[12] Document ref. B5

Q13.70: Is there an updated position as regards application dates, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6)?

39. In respect of SNF1, submission of a planning application is proposed by Spring 2027. This programme is consistent with first completions on SNF1 from 2028/29, as agreed in the Statement of Common Ground.

Q13.71: Who would be responsible for the delivery of the infrastructure delivery plan under the policy (criterion 14.)?

40. It is expected that the Council would prepare an Infrastructure Delivery Plan to support the Local Plan, which includes further detail on the requirements for each element of Policy SA6.

Q13.72: Are the 'other TBD' land uses that are referenced in sites SNF1 and SNF3 those which are listed under Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) for SNF1 and SNF3 (and SR5)?

41. The specific infrastructure required listed in Appendix F relates to the infrastructure required for the whole of Policy SA6, not SNF1.

Q13.73: How did the Sustainability Appraisal (SA) (A3.1 to A3.3) consider SNF1, SNF3 and SR5, both individually and collectively? Please provide the related paragraph references in the SA.

42. SNF1 has been assessed in Appendices G[13] and I[14] (pre- and post-mitigation) of the SA. The SA recognises the positive contribution of the sites which form Land West of Strood, including SNF1, to the spatial strategy[15]. The three sites are considered together at section K.2.6 within Document ref. A3.3.

Q13.74: Where the Statement of Common Ground with National Highways (MLP/ED20) (page 17, last paragraph of bullet point 'Site Allocations') refers to where any other site allocations which are located in proximity to the M2 Junction 1 should include this improvement, does this include the SA6 allocation and how is this reflected in the policy?

43. This is primarily a matter for the Council and National Highways. BDW will continue to engage with the Council and National Highways on any potential cumulative impact of the allocation on M2 Junction 1. Any requirement for SNF1 to contribute towards improvements at the junction should be evidenced and be proportionate to the impact of the development, in accordance with paragraph 58 of the NPPF 2024.

SUMMARY

44. BDW supports the allocation of Land West of Strood. SNF1 can deliver up to 360 homes as the first phase of the allocation, with no significant barriers to delivery, and BDW continues to work proactively with the Council and the other landowners. However, for Policy SA6 to be justified and effective, the following modifications are necessary:

[13] Document ref. A3.3, pages G22, G33, G44, G54, G63, G71, G81, G92, G102, G110 and G119.
[14] Document ref. A3.3, pages I10, I22, I33, I44, I55, I64, I74, I85, I95, I103, I114,
[15] Document ref A3.1, page N25; Document ref. A3.2, page 33;

- Amend Figure 12: Land West of Strood Concept Plan to show residential development across the developable extent of SNF1, remove the indicative school location from SNF1, and identify primary and secondary access points to SNF1, including via Clinton Avenue and Beaufort Road.

- Confirm in the policy or supporting text that individual parcels, including SNF1, can come forward independently in accordance with the site-wide masterplan, without being dependent on the timing of development on land outside Medway.

- Publish a costed schedule of the infrastructure requirements for Policy SA6, including justification for the education provision, setting out the evidence of need, location, cost, the proportion to be met through section 106 agreements and the basis for apportionment between parcels, to inform the Infrastructure Delivery Plan.

- Confirm that contributions will only be sought where they accord with Regulation 122 of the Community Infrastructure Levy Regulations 2010 and paragraph 58 of the NPPF 2024, and are proportionate to the impact of each parcel.