HEARING STATEMENT
MATTER 9: TRANSPORT

HALLAM LAND (ID: E157, E.20)

Transport Strategy and Capacity

9.1 What evidence demonstrates that the transport strategy can facilitate and accommodate the scale and distribution of development across Medway proposed by the Plan?

9.2 How does the transport strategy support the Spatial Development Strategy, particularly the scale of growth proposed on the Hoo Peninsula and within regeneration areas?

9.3 Have all strategic highway, public transport, active travel and rail infrastructure requirements been identified?

9.4 What are the principal transport constraints to growth and how will they be addressed?

9.5 What contingency measures exist to deliver the required development growth if key transport schemes are delayed or not delivered?

1.1 Hallam Land's representations (E157), including the Transport Technical Note prepared by DHA and submitted alongside the representations, sets out specific concerns regarding the scale of infrastructure required to deliver the Council's Spatial Delivery Strategy. Those concerns align with the Inspectors' questions.

1.2 Our representations note that the Council's own evidence, specifically the Infrastructure Delivery Plan, identifies risks and deficiencies in the transport infrastructure needed to support the Council's site allocations. In particular:

- Existing infrastructure is congested and unable to support growth.
- The scale and coordination of infrastructure required to serve the Hoo Peninsula is recognised to be "challenging"[1] and has limited existing transport networks (B2, para 2.7.1)
- Key infrastructure components appear to be uncosted (see, for example, B2, PDF page 30, report page 29, 'Funding': "The total funding required is not currently known".).
- Delivery and coordination mechanisms are not agreed (A1 Submission Medway Local Plan, para 9.2.8).

1.3 The Council's largest proposed sites – including the Frindsbury Peninsula, Hoo Peninsula and Chattenden – all rely on capacity at the Four Elms Roundabout. Those strategic sites are

[1] The IDP published to support the R.19 consultation states at paragraph 2.6.1 that "Development on Hoo is significantly challenging" – see https://medway.oc2.uk/docfiles/30/Infrastructure%20Delivery%20Plan.pdf

themselves held in multiple landownerships, thereby requiring coordination between multiple developer interests. It is essential that the Plan provides a clear, costed, and deliverable infrastructure investment approach. Without that approach, there is a threat to the timing of delivery of key elements of the Council's land supply and to Plan's soundness, for those reasons.

1.4 The Council seeks to rely on the development management process (B2, Infrastructure Delivery Plan PDF page 27, report page 26, 'Key Issues: "the exact approach to securing the implementation of mitigation … will be agreed through the development management process") to coordinate multi-million pound, multi-scheme, multi-agency, multi-developer and multi-year programmes. That reliance places a great burden on the Council, and introduces considerable risk in terms of complexity and delay.

1.5 The Council's own conclusions within the Phase 1 Hearings demonstrate that it can only just provide a five-year housing land supply on adoption (ED29) and that doing so is conditional upon a stepped housing trajectory. It is clear that the Council's ability to meet housing need is finely balanced, and that any delay to the delivery of strategic sites challenges the Plan's ability to demonstrate a five-year supply on adoption, and over the early years of the Plan.

1.6 The Council has recently published its "Further justification for stepped housing trajectory based on Strategic Transport Assessment" (ED38). This Technical Note, which seeks to explain "*the importance of timing the mitigation in line with a stepped housing requirement*", only further highlights the scale of the issue. For example:

- **Four Elms Roundabout:** The modelling identifies existing capacity issues, with the roundabout experiencing "*significant operational issues with the committed growth only, prior to the addition of LP demand*". High-level costings indicate that £51-£84m is required to deliver the mitigation required for this junction. Given this roundabout is the only main highway junction serving the Peninsula, it is unclear how development on the Hoo Peninsula will come forward quickly within the first five years of the Local Plan. Notwithstanding, the Hoo St Werburgh and Chattenden is expected to deliver first completions within the first year of the Local Plan.

- **Hoo Peninsula Constraints:** ED38 also identifies additional junction mitigation requirements at the J3 - A228 Peninsula Way / Main Road Hoo; A228 Peninsula Way / Dux Court Road / Bells Lane Roundabout; and the A228 Peninsula Way / Ropers Lane / Ratcliffe Highway Roundabout. ED38 itself states that "*development cannot realistically be assumed to come forward independently of these improvements*". However, the delivery of this mitigation is costly and unfunded (£11-£18m for the J3 improvements), so the Local Plan relies on interim mitigation and a Monitor and Manage Mitigation Strategy which the Council "intends to commission". This appears to be a post-hoc rationalisation to push forward development on the Peninsula before the appropriate level of mitigation has been properly identified and delivered.

1.7 For that reason, contingency measures are necessary. To be sound, the Plan must:

i. Set out fully costed infrastructure proposals and clearly identify the infrastructure dependencies of individual sites.

ii. Set out detailed delivery mechanisms, including the individual cost burden to individual sites, to provide clarity and certainty to developers

iii. Set out a clear infrastructure delivery programme tied to the trajectory of individual sites.

iv. Set out a clear monitoring mechanism for key infrastructure.

v. Identify additional contingency sites capable of being delivered quickly without reliance on common constrained infrastructure.