Hearing Statement on behalf of Bellway Homes Strategic Land:

Policy SA6: Land West of Strood

DHA PROJECT
36409

SITE
SNF3: Land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road

MEDWAY LOCAL PLAN EXAMINATION
Hearing Session 24th November 2026

1 Introductions

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

1.1 Overall, Bellway supports the optimisation of the allocated land (SA6) to deliver the required housing to meet the borough's unconstrained housing needs. Bellway has a specific interest in land at SNF3 (Land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road).

1.2 We have been engaging with the LPA and the other developers interested in bringing forward the adjoining land parcels since 2024. We have prepared a masterplan which has been tested at design review panel and this demonstrates that the site's identified residential capacity is achievable.

1.3 As a product of these discussions, we have openly shared our analysis of the site's constraints and its opportunities with the LPA and can confirm that our studies demonstrate that delivering up to 800 units on the Bellway land at SNF3 is wholly achievable, alongside the identified infrastructure requirements for this parcel. That said, our analysis has demonstrated that more than 800 units could be achieved comfortably on site, and feel that approximately 825 could be achieved. The allocation should therefore be amended to say "minimum of 800 units" to give flexibility.

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

1.4 We fully agree that the strategic allocation is consistent with the thrust of the NPPF which seeks to locate development is sustainable locations. The site is very well connected and

we append our previously submitted "Social Infrastructure Audit" (September 2024; submitted to Reg 18b consultation, which demonstrates its connectivity to a range of transport links and local services. Furthermore the allocation sets out requirements to make contributions towards encouraging sustainable habits and connecting the development.

13.61 What ecology evidence has been used in the preparation of Policy SA6?

1.5 We reserved the ability to comment in full until the LPA sets out the evidence which they have collated.

1.6 Bellway has undertaken their own ecology surveys and this has been shared with the design team for consideration in the preparation of their forthcoming outline application. We do not consider that there are any ecology constraints which would impact the deliverability of the SNF3 or reduce the development capacity of the site.

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

1.7 We would encourage the LPA to confirm their aspirations for securing affordable housing across the three development parcels forming the wider site allocation. The policy wording should be clearer given the draft plan's differing affordable housing approach for low value and high value areas as set out in draft Policy T3. We note that draft Criteria 3c is seeking the "golden rules", but the baseline percentage point needs to be clarified. We consider that development viability should be taken into account given the significant level of infrastructure which is to be sought and the site constraints.

1.8 Once Medway has provided this clarification, we reserve the right to comment.

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

1.9 We agree with the inclusion of Criterion 4, which seeks a landscape led approach to the development. This would allow the site allocation to respond to the edge of settlement context, the wider strategic planning designations and the countryside to the north. Furthermore, a landscape led approach will continue to provide the existing population in the northern part of Strood access into the countryside beyond the settlement. Overall, sub-criterion a is felt to be reflective of the general aspirations of draft policies in the emerging local plan.

1.10 However, the detailed requirements contained in sub-criterion b and c is overly prescriptive and can be dealt with at detailed design and planning application stage, in response to technical analysis.

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

1.11 The LPA needs to confirm their expectations for the production of this strategy, having due regard to their evidence from EnPlan.

1.12 As an observation, we consider that the requirements of the strategy should be proportionally split amongst the three development parcels to ensure that parcels are not overly burdened.

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

1.13 The draft allocation sits alongside land in Gravesham which is identified for major residential growth. With regards to education, it has been confirmed to us by the LPA that the secondary school (criterion 10c) will be provided within Gravesham. Robust evidence in this regard should be provided by the LPA to confirm this to ensure that the allocation remains sound.

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

1.14 No. The plan is imprecise and should be refined to reflect the developer consortium's masterplan which has been prepared following engagement with the LPA. The constraints have not been shown and scale should be clarified.

13.67 Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6?

1.15 Yes, we consider that the infrastructure requirements have been considered alongside the draft site capacity of 1,280 new homes. This view is subject to the secondary school being provided within Gravesham land.

13.68 How are these infrastructure requirements justified, in respect of evidence?

1.16 We defer to the LPA to provide their justification. Once this justification has been provided, we reserve the right to comment.

13.69 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).

1.17 We defer to the LPA to provide their expectations for securing the infrastructure requirements. Once this has been provided, we reserve the right to comment.

13.70 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)?

1.18 Yes, Bellway are intending to submit their outline planning application by the end of Q1 2027.

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

1.19 We reserve comments until the LPA has provided an answer.

13.72 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)?

1.20 We reserve comments until the LPA has provided a full answer.

1.21 With regards to SNF3 Bellway is intending to provide land for a 2FE Primary School and some small scale neighbourhood centre uses to serve the development/new population.

13.73 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.

1.22 We reserve comments until the LPA has provided an answer.

13.74 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?

1.23 The SA6 allocation is located in proximity to M2 Junction 1. The policy does not currently reference M2 Junction 1; however the requirement for financial contributions towards capacity and/or safety improvements to the junction (and/or associated 'monitor and manage' strategies) to be secured in association with forthcoming planning applications concerning this allocation will be determined on a case-by-case basis, using the evidence presented within their supporting Transport Assessments, as is standard practice.

13.75 Can the M2 Junction 1 accommodate the additional traffic associated with the SA6 Allocation and please provide an associated update where matters are still under discussion with National Highways, as per the Statement of Common Ground with National Highways (MLP/ED20) (paragraph 2.8.2)?

1.24 This is for the Council to answer first, but we set out our comments below for completeness.

1.25 Paragraph 2.2.14 of the Statement of Common Ground with National Highways states that, on the basis of the (then) latest iteration of the Council's Strategic Transport Assessment – Merge and Diverge Assessment, no Local Plan led mitigation is required on three of the four merges and diverges at M2 Junction 1. For the Coastbound Merge from Hasted Road to the M2, the evidence indicates that the Local Plan will trigger a need for a degree of mitigation in the PM peak hour only but that the primary requirement stems from other committed development and background traffic growth. National Highways therefore advised it that the performance of this arm of the junction should be kept under review via the proposed 'monitor and manage' strategy, which is considered to be an appropriate and proportionate response.

1.26 Paragraph 2.2.15 of the Statement goes on to state that, following a meeting between National Highways, Kent County Council, Gravesham Borough Council and Medway Council in July 2026, National Highways requested additional analysis of the cumulative impacts of the Medway and Gravesham Local Plans on M2 Junction 1. It is understood that this work is currently being undertaken by Jacobs on behalf of Gravesham Borough Council and Medway Council and that this will determine when mitigation is required and how it can be apportioned between allocated sites in principle.

1.27 Importantly, Paragraph 4.1.8 of the Statement confirms that National Highways and Medway Council are confident that these tasks are appropriate to resolve the remaining technical matters in this regard.

1.28 The requirement for financial contributions towards capacity and/or safety improvements to the junction (and/or associated 'monitor and manage' strategies) to be secured in association with forthcoming planning applications concerning the SA6 allocation will ultimately be determined on a case-by-case basis, using the evidence presented within their supporting Transport Assessments, as is standard practice.