Phase 2, Matter 13 Policy SA9: High Halstow – Hearing Statement (Redrow Homes Ltd)

Introduction

This Hearing Statement in response to Phase 2, Matter 13 on Policy SA9: High Halstow is submitted by Marrons on behalf of Redrow Homes Ltd ('Redrow').

Information Relevant to all questions under Matter 13 Policy SA9

For context, Redrow had planning permission granted on 22 July 2026 for a hybrid planning application ('the application') for up to 760 dwellings ('the consented scheme') on Land East of High Halstow ('the Site'). The Site is identified within "*Policy SA9: High Halstow*" as "*HHH26*" in the Medway Local Plan Regulation 22 (Core Document A1).

Further details in relation to the Site (which provides up to 760 of the 820 dwellings identified for High Halstow within Policy SA9) can be found in the submitted application documentation; principally the Planning Statement, Design and Access Statement, Officers Report and Decision Notice. These documents are located under application ref: MC/23/0855.

To demonstrate deliverability of the Site, Redrow will develop the Site themselves. In addition, the application is hybrid in nature meaning that 270 dwellings have detailed consent. This is relevant to all of the questions under Matter 13 Policy SA9 as it clearly demonstrates accordance with and implementation of the Policy.

The Illustrative Masterplan for the application is set out at Appendix 1 and Landscape Masterplan at Appendix 2.

Matter 13 Policy SA9: High Halstow

13.107 What is the justification for the scale of development (up to 820 new homes) proposed at High Halstow?

The justification for the scale of development proposed at High Halstow is two-fold. It first relates to the Local Plan and second the recently consented application.

Firstly, the Council has identified the Site for development as a housing allocation (reference HHH26 with capacity for up to 760 dwellings) since 2010 and the allocation has featured in seven draft plans from this date. A full Local Plan history in respect of the

allocation is set out in the submitted Planning Statement paras 5.15 to 5.18. The Local Plan preferred strategy for a "*blended strategy*" and its evidence base including Sustainability Appraisal, Land Availability Assessment, Infrastructure Delivery Plan, Local Housing Needs Assessment supports the scale of development at High Halstow.

Further to this, Redrow form part of the Hoo Consortium, a collection of landowners and developers with land interests on Hoo Peninsula, who have been working collaboratively with the Council for many years to bring forward new homes and supporting infrastructure.

Secondly, the application (ref: MC/23/0855) was granted permission by Medway Council for up to 760 dwellings on 22 July 2026.

As detailed in the Officers Report the application was subject to an extensive pre-application process with the Council and other key stakeholders (including 2x Design Review Panels) before being consented. The case for development is based on an NPPF compliant approach which engages the tilted balance, whilst also recognising the direction of travel of the Local Plan (including the advancement of the site allocation over time since the application was submitted in 2023).

The planning permission is subject to 72 conditions and a S106 agreement, including financial contributions equating to £31,461 per dwelling (as identified in the Officers Report), amounting to circa £24,000,000 in total.

13.108 How does the allocation support the overall spatial development strategy and the role of High Halstow within it?

The allocation supports the overall spatial development strategy by contributing towards the achievement of Medway's housing requirement.

After adopting a brownfield first policy, around 30% of new housing is directed to Medway's rural areas, mainly to the larger villages on the Hoo Peninsula (A1 – 3.1.6).

The housing contribution set out in Policy SA9 supports this objective. The planning permission for the Site demonstrates that up to 760 dwellings are deliverable and will support the overall spatial strategy. Indeed, as outlined earlier, the Officers Report (page. 299) confirmed that "*the site forms a key part of the Council's spatial strategy for meeting identified housing need.*"

As a starting point, the overall spatial strategy is driven by the need to deliver significant new housing sites (A1 – 1.3.5) and deliver sustainable development (A1 – pg. 25). The settlement has been identified for growth, and the site allocation supports this growth and the role of High Halstow within the overall spatial strategy. It lies within Hoo Peninsula which has been identified by the Council for development and forms the preferred option ("*blended strategy*") in the Sustainability Appraisal (Core Document A3.1).

The consented scheme provides 760 new homes including an emerging policy compliant level of 25% affordable housing (applicable to greenfield sites in lower value areas in accordance with Policy T3: Affordable Housing in Core Document A1) plus a significant and meaningful level of supporting infrastructure including:

- Land for new 2FE primary school (agreed with Medway Education Officers and Leigh Academy Trust). This new school will replace the existing primary school in High Halstow, enabling it to be redeveloped (for an alternative land use).
- New local centre including 1,000 sqm of flexible commercial and community floorspace (use class E and /or F) and associated parking, meaning there is potential for one large single space allowance for a local convenience / grocery store, with further allowance in other units for other retail outlets (such as take away etc), community hub (even flexi office facilities) and possibly a gym.
- Multi-Use Games Area ('MUGA') – as part of new school – to be used by school and local community (via Community Use Agreement; agreed with provider).
- New open space and landscaped areas totalling 13.45 hectares (more than double the policy requirement) including The Square, Central and Eastern Greenway, Western Greenway and Wetlands.
- New play areas on site including Locally Equipped Area for Play ('LEAP') and Local Area for Plays ('LAP').

The consented scheme also provides SUDs, 10% (minimum) biodiversity net gain, five new access points and improvements to walking and cycling routes and other elements to create a high quality new development which is well-integrated with the existing village.

13.109 What assessment has been undertaken of landscape character impacts and how has Policy SA9 sought to maintain the character and identity of High Halstow?

The impact on landscape character associated with Policy SA9 is covered by the Local Plan and planning permission.

Policy SA9 includes the following criteria for development:

- Point 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 opportunities to enhance landscape character."

- Point 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.*"

These criteria have been achieved by the consented scheme, which retains the distinct identity of High Halstow, avoids coalescence and respects its countryside setting. These elements of the proposals were discussed at length during the application process with Planning and Landscape Officers and are clearly demonstrated in the evolution of the design (as explained below).

The proposals are sensitively designed and follow a landscape-led approach based on detailed site assessments (and design workshops). The consented scheme protects and enhances landscape features and delivers a strong framework of green infrastructure, drawing inspiration from the existing landscape context to act as a catalyst for integration.

Specific examples of how the Site (HHH26) will maintain the character and identity of High Halstow are set out below.

- The planting strategy for the consented scheme includes tree lined streets and focuses on introducing a rich palette of native and ornamental tree, shrub and herbaceous planting to emphasise the mosaic landscape (set out in the overriding landscape strategy).
- As part of workshops with Council Officers (planning, design, landscape) the proposals evolved to create a more rural and village-like feel (in accordance with points 5 and 8 of the Policy) by realigning the primary road to be less rigid, reconfiguring The Square to enable greater permeability, increasing planting, widening and more informal greenways / green links / corridors and increasing spacing between dwellings.

13.110 How will Policy SA9 avoid unacceptable harm to the character and identity of High Halstow?

Policy SA9 aims to ensure high quality and appropriate development at High Halstow. It is a detailed policy with one objective and 11 criteria covering a range of matters including but not limited to design, transport, landscape, housing, community uses, open space.

The consented scheme achieves these criteria as summarised below:

Criteria	Consented scheme
Objective	
1. By 2041, High Halstow will have grown as a village, providing up to 820 new homes, a new primary school, attractive multi-functional green infrastructure and an additional centre providing commercial and community services. New development will be successfully integrated with the existing village and the surrounding countryside.	Provides 760 (of the 820) new homes and importantly, includes land for a new primary school, green infrastructure, and an additional centre (for commercial and community services) whilst being successfully integrated with the existing village and 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.	Under "*subsequent design principles*" (later in the policy wording) it is stated that the applicant will be required to produce a masterplan (see Appendix 1). The application achieved this.
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.	Designed to fully integrate with the village and ensure maximum connectivity and permeability by improved walking and cycling routes e.g. upgrades, green corridors and location of local centre to help create a 15-minute neighbourhood so that local services and facilities are accessible to both new and existing residents.
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 opportunities to enhance landscape character.	Consented scheme to retain distinct identity of High Halstow and avoid coalescence with nearby villages. The proposals create a rural / village like residential led development. Landscaping including buffer planting significant across the Site.
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.	Consented scheme to respect the village feel and be of high quality with defined character areas with mix of housing areas drawing upon local character assessment.
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. Development will provide a mix of types and designs of homes, including houses, bungalows, affordable homes and opportunities for self-build.	Housing proposals on Site to meet local needs. mix of housing including apartments and family housing, and bungalows, and 25% affordable housing.

7. Development will provide for a new two form entry primary school in accordance with the latest IDP, located by the new 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.	Provide land for a new 2FE entry primary school and provide floorspace for community and / or commercial uses (up to 1,000 sqm) in new local centre.
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.	Landscape-led proposals including high quality and significant green infrastructure. Open spaces on Site total c. 13.5 hectares (which is double the policy requirement).
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.	New open space to be provided in accordance with local policy and provides a range of both informal and formal open spaces and play areas and allotments.
10. Development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport.	Accessibility is at the heart of the consented scheme to ensure strong integration and permeability for pedestrians and cyclists, with 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 services linked to the urban area.	Consented scheme to improvement of bus service via enhanced bus stops and potential for bus service to access the Site.
12. The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute 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; and Ropers Lane junction with A228	Consented scheme to include multiple access points (as required by policy and agreed with the Council) and contribute towards transport improvements to the strategic highways network via financial contributions in the S106 agreement.

Notably, the application is supported by an Environmental Impact Assessment which considered air quality, archaeology, built environment, ecology, highways and transport, land and soil (including sub-soil pollution), landscape and visual impact assessment, noise and vibration, socio-economics, water resources and flood risk and residual impact, mitigation and cumulative schemes (all agreed with the Council).

The application is also supported by a suite of supporting documents based on detailed site assessments and studies, which have been subject to consultation with the relevant statutory bodies.

13.111 Are the proposed landscape buffers and safeguards justified and effective and are they sufficient to avoid unacceptable coalescence, encroachment into the countryside or harm to local character?

Please refer to the submitted Landscape Masterplan at Appendix 2. In essence, the proposals retain key landscape features and seek to make landscape improvements.

The proposals do not lead to coalescence and any encroachment into the countryside and / or harm to local character can be appropriately mitigated through design and mitigation measures as demonstrated by Policy SA9 and the planning permission. The consented scheme has been sensitively designed based on a landscape-led approach and subject to extensive discussions with Officers and consultation with statutory bodies. This justifies the proposals (which reflect the allocation).

The consented scheme includes 13.48 hectares of open space of varying typologies (which is more than double the adopted policy requirement – as set out in the Design and Access Statement). This demonstrates the landscape-led approach and illustrates the effectiveness of the proposals (which reflect the allocation).

Looking at natural and semi natural greenspaces alone, which includes landscape buffers, 8.05 hectares are proposed which exceeds the policy requirement of 2.49 hectares by more than three times. The main landscape buffer is located along the northern and eastern edges of the Site (with landscape buffers also along the south and western edges).

13.112 What evidence demonstrates that local services, facilities and infrastructure can support the proposed growth set out within Policy SA9?

The planning permission considers the impact on local services, facilities and infrastructure through the application submission, including the Environmental Statement and is in accordance with the requirements of Policy SA9, which are based on the Local Plan evidence base.

For example, the Infrastructure Delivery Plan (Core Document B2) states the following:

- Under Education & Early Years (3.3) it states that "*the proposed developments around Chattenden and High Halstow will require the relocation and expansion by*

1FE of both Chattenden and High Halstow Primary Schools by September 2028 and 2029." The consented scheme achieves this by providing land for a new 2FE primary school which has been agreed with the Council and provider, and the S106 includes a c. £11,500,000 financial contributions towards education.

- Under Transport (3.2), it states that *"The Medway Local Plan 2041 notes the key role for bus improvements, particularly on the Hoo Peninsula, but also to support strategic development in suburban areas."* The consented scheme includes improvements to bus stops and has been designed to enable a bus service to enter the Site if required (to be agreed with operator).

The consented scheme includes a range of new services, facilities and infrastructure designed to complement the existing village and meet the needs of new and existing residents. These elements of the proposals are set out in response to Question 13.108 above.

To support the new facilities, accessibility, especially by foot and cycle, is at the heart of the consented scheme, and therefore both new and existing services and facilities are highly accessible to all residents.

The consented scheme supports the proposed growth set out in the allocation by delivering 760 new homes and supporting services and infrastructure.

13.113 What infrastructure improvements are required and how and when will they be delivered?

In terms of transport and movement, the consented scheme improves walking and cycling connectivity to create a 15-minute neighbourhood to reduce reliance on the private car. It also includes new and improved bus stops along Britannia Road and Christmas Lane and the consented scheme can be accessed by a bus service if required.

In terms of strategic transport, there is a strategic financial contribution towards highways improvements. This is set out in the S106 and aligns with the Local Plan approach.

In terms of utilities, existing infrastructure in the vicinity includes power, streetlighting, telecommunications, potable water, foul water sewers, surface water sewers, and gas and there are no issues with extending these into the development as demonstrated by the planning permission.

Waste and servicing are also addressed in the planning permission. The waste strategy is based on sustainable management and is in line with Medway's approach.

Furthermore, the total financial contribution from the S106 Agreement is circa £24,000,000 which is a significant figure which will support infrastructure improvements relating to:

- Libraries;
- Youth provision;
- Waste and recycling;
- Signage and information (for PROWs);
- Social care, primary care and community care;
- Education (2FE primary school);
- Strategic highways (including but not limited to improvements to Four Elms, Sans Pareil, Main Road, Ropers Lane roundabouts and a wider sustainable transport package);
- Strategic Environmental Mitigation Strategy ('SEMS').

Also, some of the S106 Agreement is specifically directed to High Halstow in relation to

- local community facilities;
- civic space and gateways and new sports and leisure facilities (including upgrades to the existing cricket pavilion, toilets and village hall and upgrades to existing and new football pitches at High Halstow playing field and Deangate Sports Ground);
- Improving local open space (including improving existing open space provision and equipment within High Halstow including but limited to the existing MUGA, Skate Park, football pitches, cricket pavilion, village hall and or towards the purchase of additional land to improve existing sports provision within the village).

These contributions will have a direct and meaningful impact on improving services, facilities and infrastructure in the village and they respond directly to requests from High Halstow Parish Council (received during the planning application process).

13.114 What assessment has been undertaken regarding impacts on ecology and heritage assets?

In terms of ecology, the application included a Habitats Regulations Assessment, BNG Assessment; and it was covered in the Environmental Impact Assessment. KCC Ecology and Natural England were consulted as part of the application and the proposals were considered to be acceptable subject to conditions and relevant obligations in the S106 Agreement.

The ecological strategy protects "*Fishers Wood*" (including buffer) and retains grassland, ponds, scrub and woodland, whilst creating ecology buffer zones and green corridors, new species rich grassland, new native hedgerow planting and SUDs. Further details are set out in the planning application submission.

In terms of heritage, the Environmental Impact Assessment considered built heritage. Further to this, a local character study was undertaken and is found within the Design and Access Statement.

13.115 Are the mitigation measures identified within the policy justified, effective and deliverable?

The mitigation measures identified in Policy SA9 are justified, effective and deliverable. This is evidenced by the planning permission which includes a range of mitigation measures which are considered acceptable by Medway Council. In fact, the level of detail and assessment within the planning permission goes arguably further than the Policy itself and as a result, the measures identified in Policy SA9 are found to be appropriate, acceptable and deliverable. Examples of how the consented scheme goes further than the Policy relates to the improvements to services and infrastructure directly aimed at High Halstow (as set out in response to Question 13.113).

13.116 Are there any ownership, environmental or infrastructure constraints identified that could affect delivery of the scale of development proposed on the allocated sites within Policy SA9 (HHH26, HHH29 and HHH15)?

There are no constraints relating to ownership, the environment or infrastructure that could impact the delivery of Policy SA9. HHH26 has a planning permission.

13.117 Are the component sites of SA9 available, suitable, viable and achievable within the anticipated timescales as set out in the housing trajectory?

The planning permission demonstrates that HHH26 is deliverable. The Site is available, suitable, viable and achievable.

13.118 What delivery assumptions concerning Policy SA9 underpin its position within the housing trajectory and are they realistic?

HHH26 has a planning permission and Redrow has discussed delivery rates with the Council during the application and plan-preparation process. The timescales for delivery are considered to be accurate.

Appendix 1: Illustrative Masterplan



Appendix 2: Landscape Masterplan

(see overleaf)


Key
Site Boundary
The Square
The Green
Play Area
Allotment
SuDS Features
Planted Swale and Rain Garden within Verge
Footpath and Boardwalk
Foul Pumping Station
N
Not to scale