Medway Local Plan – Examination in Public

Hearing Statement: Matter 9 - Transport

November 2026

savills

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Document History

Issue	Date	Issued by	Comment
1.0	14/10/2026	LE	Draft for internal review
1.1	15/10/26	AW	Draft for client comment
2.0	27/10/26	AW	Final

1. Introduction

1.1 This Hearing Statement has been prepared by Savills on behalf of the Church Commissioners for England (the Commissioners) in response to Matter 9 of the Inspectors' Matters, Issues and Questions for the examination of the Medway Local Plan 2041 (the Plan).

1.2 Land West of Ropers Lane (HHH22), Land East of Ropers Lane (HHH31) and the Kingsnorth Expansion Area (HHH35) are owned by the Commissioners. The Policies Map shows a significant area of the Land East of Ropers Lane as 'Safeguarded Land for Transport Scheme' and Policy DM17 currently states that development proposals which compromise this safeguarded land for new rail infrastructure will be resisted. This position is reiterated in Policy SA8 criterion 14 which safeguards land for future potential use of the freight line for passenger traffic.

1.3 The Commissioners' membership of the Hoo Consortium enables it to rely, where relevant, on the Consortium's representations concerning the shared vision for growth at Hoo St Werburgh. This Statement is confined to the additional land safeguarded for a potential passenger station and associated infrastructure on the Commissioners' Land East of Ropers Lane. It does not challenge the continued operation or protection of the existing freight railway. It develops the concerns raised in the Commissioners' Regulation 19 representations.

2. Response to the Inspector's Questions

MIQ 9.32: What evidence demonstrates a continuing need to safeguard the Grain Branch?

2.1 The published evidence identified in this Statement does not adequately explain the location and extent of the additional land safeguarded on HHH31 for a potential passenger station and associated infrastructure. Policy DM17 refers to *Network Rail's South East Route: Kent Area Route Study* (2018), which considers growth to 2024 and 2044. The question is whether that strategic study, together with any subsequent evidence, provides a sufficiently robust and up-to-date justification for the particular station-related safeguarding shown on the Policies Map.

2.2 The 2018 Network Rail study records the Council's interest in a new station on the Grain Branch at Hoo (Deangate), associated with proposed housing growth (para 6.15.20, page 87). However, a strategic aspiration for passenger services does not, by itself, explain the location, configuration or extent of the station-related land required on HHH31. The Council should identify the technical work supporting the safeguarding boundary and explain how it relates to a credible future passenger-service proposal.

2.3 The Infrastructure Delivery Plan (IDP) (B2) does not identify a new passenger station at Hoo in Appendix 1 as key infrastructure required to support delivery of the Local Plan, with an associated cost, delivery programme or funding source. The Council should clarify the intended timescale and delivery basis for the station proposal and explain how these inform the extent and duration of safeguarding and its relationship with the planned development of HHH31.

2.4 The IDP also refers to *Network Rail's Spring 2023 North and East Kent Connectivity Strategic Study* which does not appear to be a publicly available document, and neither is it published in the Council's Evidence Library as part of the examination. The Council should identify the relevant findings and explain how they support the location and extent of the proposed station-related safeguarding. The Council should also clarify Network Rail's current position on the passenger-service proposal and the station-related safeguarding, including any relevant agreement or technical advice relied upon in preparing the Plan.

2.5 On the evidence identified above, the justification for the location and extent of land safeguarded on HHH31 for a potential passenger station and associated infrastructure has not been adequately demonstrated. The Commissioners requests that the Council provide that justification. This concern relates to the additional station-related land, rather than the protection of the existing railway line.

MIQ 9.36: Are the safeguarding arrangements proportionate, having regard to competing land uses and development opportunities?

2.6 The Plan safeguards land within HHH31 for a potential passenger station and associated infrastructure. The Commissioners supports safeguarding that is proportionate to the requirements of a credible future transport proposal.

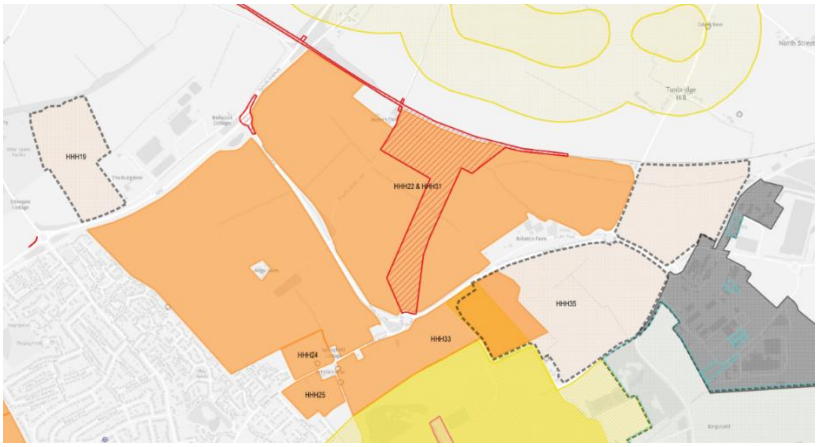
2.7 Earlier Station Quarter masterplanning undertaken by Corstorphine & Wright, with transport input from Pell Frischmann, demonstrated that a passenger station and associated infrastructure, including access and car parking, could be accommodated within a substantially smaller area than the land currently identified for safeguarding. The Station Quarter Concept Plan, drawing 20231-HSW-CWA-XX-ZZ-DR-A-0301 Revision 05, is included at Appendix 1 and illustrates that arrangement.

2.8 Pell Frischmann has advised that a substantial element of the additional land sought by the Council related to an enlarged station car park and associated access arrangements. The safeguarding also encompasses land within the loop of the station access road. The Corstorphine & Wright concept plan shows that this land could accommodate development whilst retaining the station access arrangements. Safeguarding the access road does not, in itself, require all of the land enclosed by it to remain undeveloped.

2.9 Whilst the concept plan does not fix the final design or land requirement, it provides a clear basis for questioning the extent of the proposed safeguarding. The Council should explain why the additional land remains necessary, taking account of this work and any subsequent technical evidence. In the absence of such justification, the safeguarding boundary should be reduced to avoid unnecessarily constraining the planned development of HHH31. Where safeguarding is retained, the Plan should provide for its review and allow development that would not prejudice the future transport opportunity.

MIQ 9.37: Is the safeguarded alignment shown clearly on the Policies Map?

2.10 The Policies Maps identify land within HHH31 as safeguarded land for transport schemes. The Commissioners' Regulation 19 representations identify a discrepancy between the North West Policies Map and Figure 14. The Council should explain and reconcile the extent of station-related safeguarding shown in these documents and distinguish it clearly from the existing railway alignment. The final boundary should be supported by evidence of the land reasonably required for the proposed infrastructure.



Extract from Local Plan proposals map



Figure 14 From Local Plan (page 279)

MIQ 9.38: Under what circumstances would development affecting the route be acceptable?

2.11 Development affecting the additional station-related safeguarding should be acceptable where it can be demonstrated that it would not prejudice a credibly evidenced future passenger-service and station proposal. This could include compatible interim uses or development on land demonstrated to be unnecessary for the scheme following refinement of the safeguarding boundary, including land within the loop of the station access road where the necessary access and station infrastructure can be retained.

2.12 The Plan should also provide for an evidence-based review of the justification and extent of safeguarding. Where such a review establishes that there is no longer a realistic prospect of the infrastructure being implemented, the relevant land should be released from safeguarding through the appropriate plan-making process. Any alternative development would remain subject to the other relevant policies of the Plan.

MIQ 9.39: Are the safeguarding requirements justified, effective and consistent with national policy?

2.13 As set out in the Commissioners' Regulation 19 representations, the objection concerns the justification and extent of the proposed passenger-station safeguarding on Land East of Ropers Lane. The supporting transport representations by Pell Frischmann are included at Appendix 13 of that submission.

2.14 Paragraph 111(c) of the NPPF supports the protection of sites and routes where robust evidence demonstrates their potential importance to future transport infrastructure. The Commissioners recognises that safeguarding can legitimately protect a longer-term opportunity before full funding is secured. The issue is whether there is robust evidence for the particular land safeguarded and whether the resulting restriction is proportionate and sufficiently clear.

2.15 To satisfy the tests of soundness in paragraph 36 of the NPPF, the station-related safeguarding should be justified by robust evidence, accurately defined and supported by clear provisions governing compatible development and review. The Commissioners seeks modifications to address those matters.

3. Conclusion

3.1 The Commissioners supports the planned growth at Hoo and the provision of sustainable transport. Its concern is that the evidence identified in this Statement does not adequately justify the extent of additional land safeguarded on HHH31 for a potential passenger station and associated infrastructure.

3.2 The Commissioners requests that the Council justify and accurately define the station-related safeguarding, removing or reducing any extent that cannot be supported by robust evidence. Where safeguarding is retained, the Plan should provide a clear review mechanism and allow development that would not prejudice the evidenced transport opportunity. Corresponding amendments should be made to Policy DM17, Policy SA8 criterion 14, the Policies Map and Figure 14 as necessary. These changes would protect a justified future transport opportunity while avoiding unnecessary constraints on the delivery of the allocation.

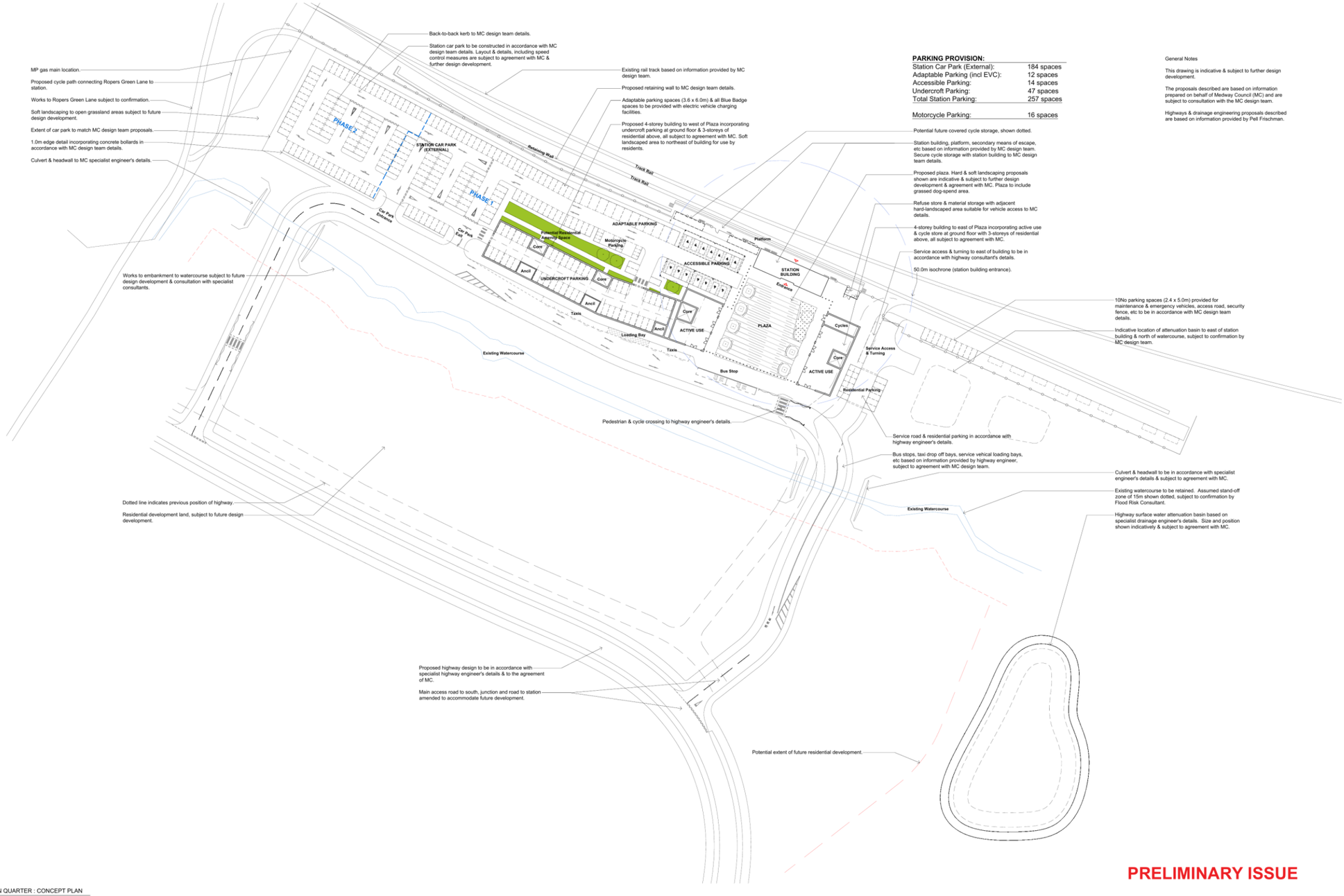
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Appendix 1 Station Quarter Concept Plan



PARKING PROVISION:

Station Car Park (External):	184 spaces
Adaptable Parking (incl EVC):	12 spaces
Accessible Parking:	14 spaces
Undercroft Parking:	47 spaces
Total Station Parking:	257 spaces
Motorcycle Parking:	16 spaces

General Notes

This drawing is indicative & subject to further design development.

The proposals described are based on information prepared on behalf of Medway Council (MC) and are subject to consultation with the MC design team.

Highways & drainage engineering proposals described are based on information provided by Pell Frischman.

PRELIMINARY ISSUE

1 STATION QUARTER : CONCEPT PLAN
1:500

NORTH

0 5.0 10.0 15.0 20.0 25.0 50.0m

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Rev.	Description	Date	Drwn	Chkd
05	Layout updated to incorporate updated engineering proposals.	07.10.22	AR	NAB
04	Layout updated to incorporate MC rail team comments, subject to HE input.	06.10.22	AR	NAB
03	Layout updated following review 29.09.22. Future residential development omitted.	29.09.22	AR	NAB
02	Plan updated to A0 sheet. Updated to show residential areas & general updates.	28.09.22	AR	NAB
01	Plan updated following design workshop 20.09.22.	21.09.22	AR	NAB

Client: Church Commisioners for England

Project: Hoo St Werburgh

Drawing Title: Station Quarter Concept Plan

Drawing Status: WORK-IN-PROGRESS

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Drawn	Checked	Paper Size	Scale	Date
KW	AR	A0	1:500	27.09.22