EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 9 - Transport

ISSUE

Whether the Plan has a transport strategy that is justified by proportionate evidence, is capable of supporting the scale and distribution of growth proposed and is consistent with national policy.

Whether the transport strategy provides sufficient capacity to accommodate the proposed scale of development.

Whether the Plan and its relevant policies provide an effective framework for achieving sustainable travel and transport solutions.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	9.1-9.12, 9.32-9.35 and 9.39
Hearing session	17 November 2026 - AM session and PM session
Statement date	29 October 2026
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Submitted on behalf of The Independent Group (TIG) on Medway Council
Councillor Michael Pearce, Planning Spokesman

1. PURPOSE AND STATUS OF THIS STATEMENT

1.1 This Hearing Statement is submitted by The Independent Group (TIG) in relation to Matter 9 - Transport. It addresses only the Inspectors' Matters, Issues and Questions (MIQs) identified below and should be read alongside TIG's Regulation 19 representations listed in section 6.

1.2 This statement does not introduce new evidence or a new objection. It focuses and clarifies TIG's existing Regulation 19 concerns about the deliverability, funding and phasing of strategic transport infrastructure, particularly where the proposed scale of growth on the Hoo Peninsula depends upon that infrastructure. Examination material produced after Regulation 19 is referred to only insofar as it bears upon those existing concerns.

1.3 TIG responds to MIQs 9.1-9.12 and, on the Grain Branch, MIQs 9.32-9.35 and 9.39, which engage its existing concerns about transport delivery, funding and proposed passenger rail.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

2.1 B18.1 forecasts sufficient capacity for the proposed allocations only on the assumption that mitigation at eight key junctions is delivered and monitored; whether this is achievable remains disputed.

2.2 The decisive issue is effectiveness. MLP/ED38 states that Hoo growth is intrinsically linked to supporting transport infrastructure and cannot realistically come forward independently of it; proposed growth can be accommodated subject to delivery. This reinforces TIG's Regulation 19 concern that growth must not run ahead of the infrastructure on which the transport case depends.

2.3 The later evidence also shows that timing is tight. MLP/ED26 finds that the interim Four Elms scheme can achieve nil detriment in Years 5 and 6 but requires further improvement from Year 6; the interim Main Road Hoo scheme is no longer sufficient by Year 6, when the full scheme is required; and Sans Pareil requires further improvement after Year 6. The Plan therefore needs operative phasing and contingency mechanisms, not simply identification of schemes in principle.

Soundness / legal test engaged

2.4 TIG's principal Matter 9 concern is whether the Plan is justified and effective: the capacity conclusion is conditional upon mitigation while important funding, phasing, monitoring and delivery arrangements remain future work or development-management matters.

Main Modification / action sought

2.5 TIG seeks targeted Main Modifications to SA8 and DM15 and a coherent transport delivery schedule. Development phases should be linked to infrastructure and monitoring triggers, with clear responses to delay. If the submitted Hoo Peninsula quantum cannot be demonstrated to be effective and deliverable on that basis, the affected Hoo allocations should be deleted, substantially reduced or rephased to the

level the transport evidence can support. If the necessary deletion or redistribution would fundamentally recast the spatial strategy, the Plan should not be adopted and should be withdrawn and re-prepared.

3. RESPONSES TO THE INSPECTORS' MIQs

3.0 The changes identified below are without prejudice to TIG's position at paragraphs 4.2-4.3. If any defect cannot be remedied by limited further work and Main Modifications without materially recasting the submitted Plan, TIG seeks non-adoption, withdrawal and re-preparation.

3.1 MIQs 9.1 and 9.2 - Evidence that the transport strategy can accommodate growth and support the Spatial Development Strategy

TIG's answer: Only conditionally demonstrated.

Reasoning...

3.1.1 B18.1 is important evidence in the Council's favour, but its conclusion is conditional upon mitigation at eight key junctions. It also records deterioration at junction approaches and potential transfer of delay elsewhere, including Berwick Way and Corporation Street.

3.1.2 The sustainable-transport assumptions are also material. B18.2 identifies the Hoo Peninsula under existing conditions as a Tier 3 location with approximately 70% car mode share, moving to Tier 2 at approximately 60% under the proposed-intervention assessment. BRT is identified as particularly significant because the Hoo cluster accounts for around a quarter of the Local Plan residential allocation. B18.3 nevertheless identifies further work on funding, route options, commercial strategy and a business case, and recognises that dwellings may be delivered in the first Plan period before BRT is operational.

3.1.3 MLP/ED38 explains the link between growth and infrastructure. Four Elms is over capacity with committed growth alone; Main Road Hoo and Sans Pareil require mitigation within five years. MLP/ED26 shows that interim schemes are time-limited: Main Road Hoo needs full mitigation by Year 6. MLP/ED38 used the February 2025 housing trajectory; TIG requests reconciliation with ED31's September 2026 stepped requirement and current site phasing.

3.1.4 The Council's proposed new strategic policy in MLP/ED31 says Hoo growth will be planned and phased so that infrastructure is delivered alongside development. TIG supports that principle. However, it does not identify the transport schemes, development thresholds, occupation controls or fallback actions which make the principle operational.

Regulation 19 basis: TIG Main Representation, sections 2.3, 3.3.2, 5.5 and 8.3; E.37 / SDLP 111, 114, 117 and 118.

Change necessary: Translate the conditional transport capacity conclusion into enforceable Plan-level phasing and delivery safeguards, particularly for Hoo. See MM-TIG-M9-01 and EX-TIG-M9-03.

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

TIG's answer: The principal requirements are now broadly identified, but not all are reflected or sufficiently resolved in the operative Plan.

Reasoning...

3.2.1 Policy SA8 identifies Four Elms, Main Road Hoo, Dux Court Road/Bells Lane and Ropers Lane as off-site highway mitigations for Hoo growth. The IDP and STA identify further strategic constraints, including Sans Pareil and the M2 junctions.

3.2.2 The updated National Highways SoCG (MLP/ED20) regards the STA as proportionate subject to further joint work. The specific M2 Junction 3 mitigation issue is agreed; M2 Junctions 1 and 4 remain relevant. National Highways identifies the M2 Junction 1 eastbound merge improvement as required, with Hoo a major contributor, and seeks its inclusion in SA8. ED20 also identifies work on cumulative growth, timing, funding and contributions at Junction 1.

3.2.3 On public transport, the IDP identifies Strood-to-Hoo BRT as a critical strategic project within 0-10 years, but records the delivery body, cost and funding as TBC. B18.3 identifies BRT, LCWIP and internalisation measures as part of the strategy for reducing car trips, while also identifying funding and programme work still required.

3.2.4 The Grain Branch is addressed separately at section 3.6. TIG does not treat a potential future passenger service as committed mitigation. The immediate question under MIQ 9.3 is whether the highway and sustainable-transport package actually relied upon for planned growth is secured and programmed.

Regulation 19 basis: TIG Main Representation, sections 2.3, 3.3.2 and 8.3; E.37 / SDLP 114, 117 and 118.

Change necessary: Amend SA8 to reflect all strategic transport requirements materially attributable to Hoo growth, including the M2 Junction 1 requirement identified by National Highways, and provide a reconciled programme for the sustainable transport package.

3.3 MIQ 9.4 - Principal transport constraints and how they will be addressed

TIG's answer: The principal constraints are now identified; the outstanding question is whether the Plan secures their mitigation at the required time.

Reasoning...

3.3.1 The evidence identifies a constrained Hoo corridor and associated strategic network. B18.6 finds Main Road Hoo and Sans Pareil over capacity in Year 5. Four Elms was excluded from that temporal exercise because mitigation is required in the Reference Case without Local Plan demand. M2 Junction 1 is also required for Local Plan delivery, but B18.6 says the current methodology could not determine the point in the Plan period when it would be required.

3.3.2 The scale of the schemes is material. B18.7 gives high-level full-scheme costs of £11-18 million for Main Road Hoo, £23-38 million for Sans Pareil and £51-84 million for Four

Elms, excluding land and extensive utility diversion. MLP/ED38 identifies interim schemes but confirms that funding, approvals, design and construction require time.

3.3.3 TIG accepts that not all costs are attributable to Local Plan development. MLP/ED38 distinguishes existing/committed-growth problems from additional Local Plan impacts. The Plan must nevertheless identify a deliverable route for the necessary intervention, including proportionate developer contributions and any non-developer funding.

Regulation 19 basis: TIG Main Representation, sections 2.3, 5.5 and 8.3; E.37 / SDLP 117 and 118.

Change necessary: Identify the scheme, funding and development trigger pathway with sufficient certainty to demonstrate that each affected phase of growth is deliverable.

3.4 MIQ 9.5 - Contingency if key transport schemes are delayed or not delivered

TIG's answer: Not sufficiently clear or effective.

Reasoning...

3.4.1 The Plan contains potentially useful mechanisms, but not a clear contingency framework. Paragraphs 9.2.8-9.2.11 leave payment triggers and Section 106/278 implementation to development management and allow Grampian-style conditions; SA8 points to a future Hoo Peninsula Infrastructure Plan; and the Council intends a Medway-wide Monitor and Manage Mitigation Strategy.

3.4.2 The IDP reinforces the uncertainty. It lists Sans Pareil, Four Elms and Main Road Hoo as critical 0-5 year projects, while M2 Junction 1 has timeframe, delivery body, cost and funding unknown/TBC. Strood-to-Hoo BRT is critical within 0-10 years, with delivery body, cost and funding also TBC.

3.4.3 MLP/ED31's proposed stepped requirement does not replace the need for scheme-specific contingency. If critical junction or BRT infrastructure slips, the Plan should specify rephasing, occupation caps, alternative mitigation or review. The Council should demonstrate which Hoo sites and maximum cumulative dwelling quantum could proceed without each delayed intervention. Where no credible mitigation is deliverable, dependent Hoo allocations or development quantum should be reduced or removed, rather than assuming infrastructure will follow.

Regulation 19 basis: TIG Main Representation, sections 2.3 and 8.3; E.37 / SDLP 117 and 118.

Change necessary: Insert a clear trigger-and-response framework into SA8/DM15 and the supporting text so that dependent growth cannot run ahead of the infrastructure required to accommodate it; where delivery cannot be demonstrated, reduce or remove the affected Hoo allocation/quantum.

3.5 MIQs 9.6-9.12 - Policy DM15: Monitoring and Managing Vehicle Trip Generation

TIG's answer: Monitoring is necessary, but Policy DM15 has not been demonstrated to be effective as drafted.

Reasoning...

3.5.1 MIQ 9.6: Monitoring is necessary. B18.1 itself recommends continuing to monitor junction capacity and queues, and the later interim-junction work demonstrates that the appropriate mitigation changes as development proceeds. A monitor-and-manage approach can therefore complement Transport Assessments and Travel Plans.

3.5.2 MIQ 9.7: B22.9 now supplies a numerical vehicle trip budget through the Mode Shares and Trip Rate Assessment Tool, and DM15 identifies a 50-home/5,000 sqm policy threshold. However, the more important infrastructure triggers remain less clear. The Plan says payment triggers will be negotiated through development management and SA8 points to a future Hoo Peninsula Infrastructure Plan. The evidence does not yet translate the modelled Year 5/Year 6 constraints into a transparent development or occupation trigger framework.

3.5.3 MIQs 9.8 and 9.9: DM15 is clearer about the possibility of trip generation being lower than forecast than about the response where it is materially higher. Paragraphs 9.2.13-9.2.14 contemplate avoiding some mitigation and applying a contribution discount where trip generation is lower. The policy should also state the response where monitoring shows higher trips, slower modal shift, infrastructure delay or unacceptable network performance. That response may include additional sustainable transport measures, additional proportionate mitigation, an occupation/phasing restriction, reduction of the affected development quantum or review.

3.5.4 MIQ 9.10: A Medway-wide Monitor and Manage Mitigation Strategy is a potential mechanism for cumulative impacts, but it has not yet been commissioned. The Plan should establish how cumulative monitoring and responsibility for remedial action will operate.

3.5.5 MIQ 9.11: Paragraph 9.2.10 makes Medway Council responsible for monitoring trip credits and collecting contributions. The wider strategy should also define the baseline, data, review frequency, thresholds and responsibility for remedial measures.

3.5.6 MIQ 9.12: The updated National Highways SoCG (MLP/ED20, paragraph 2.8.1) identifies an effectiveness issue with DM15. Reduced trip generation should be linked to transport measures or infrastructure that will deliver it; the proposed developer-contribution discount is premature because it could undermine funding for necessary improvements. National Highways regards the omission of site-specific off-site issues as acceptable only if DM15 is applied robustly.

Regulation 19 basis: TIG Main Representation, sections 2.3, 5.5 and 8.3; E.37 / SDLP 112, 114, 117 and 118.

Change necessary: Amend DM15 and supporting text to define the measures underpinning reduced trip assumptions, cumulative monitoring governance, infrastructure/development triggers and the response to underperformance. Do not allow contribution discounts unless the monitoring framework demonstrates that the relevant mitigation and funding remain sufficient. See MM-TIG-M9-02.

3.6 MIQs 9.32-9.35 and 9.39 - Policy DM17: Grain Branch

TIG's answer: Safeguarding is justified in principle, but potential passenger rail is not committed mitigation.

Reasoning...

3.6.1 MIQs 9.32 and 9.33: The Grain Branch remains operational for aggregates, aviation fuel and Thamesport freight. A1, B2 and Network Rail's E.164 / SDLP 965 support its continuing and future freight role. TIG therefore does not challenge safeguarding for freight purposes.

3.6.2 MIQs 9.34 and 9.35: A1 records a Sharnal Street passenger connection as an opportunity to increase rail capacity and support growth. Network Rail nevertheless noted the lack of funding and, in SDLP 973, sought a clear strategy and funding mechanism. B2 identifies safeguarding and generic rail funding sources, but no committed Grain passenger scheme or programme.

3.6.3 MIQ 9.39: TIG's Regulation 19 concern was delivery certainty, not opposition to safeguarding. DM17 can be justified as a safeguarding policy, but a potential passenger service should not be relied upon to demonstrate the sustainability or deliverability of Hoo growth unless a viable scheme, funding mechanism and delivery programme are established.

Regulation 19 basis: TIG Main Representation, sections 2.3, 3.3.2 and 8.3; E.37 / SDLP 117 and 118.

Change necessary: Retain DM17, but keep a clear distinction in the supporting text between the continuing freight function, a safeguarded passenger opportunity and transport measures actually committed or relied upon to support growth.

4. OVERALL CONCLUSION ON THIS MATTER

4.1 TIG acknowledges that the transport evidence base has materially advanced. The Council's modelling suggests that the proposed allocations could be accommodated only if the identified mitigation is delivered. The later examination evidence proposes interim schemes and a stepped housing requirement, but does not itself secure their timely delivery.

4.2 That progress makes the remaining issue more focused. The Council's own evidence establishes that Hoo growth is dependent on timely supporting transport infrastructure. Yet the submitted Plan still leaves important scheme triggers, exact securing mechanisms, monitoring architecture, funding routes and contingency responses to future plans, strategies or development-management negotiations. This is especially important where interim mitigation may cease to be sufficient by Year 6.

4.3 TIG's primary position is that the Plan should be modified so that the transport package required for Hoo growth is demonstrably deliverable, funded or secured, properly phased and subject to effective contingency controls. If that cannot be demonstrated for the submitted Hoo Peninsula growth package, the affected Hoo allocations should be deleted or substantially reduced/rephased and the growth redistributed to a demonstrably deliverable strategy. If the necessary deletion or redistribution would fundamentally recast the submitted spatial strategy, the Plan should not be adopted in its present form and should be withdrawn and re-prepared.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

5.1 These changes are without prejudice to TIG's position at paragraphs 4.2-4.3 and apply only if the defects can be remedied without materially recasting the submitted Plan.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M9-01	Policy SA8 / Hoo transport phasing and allocations	SA8 lacks sufficiently clear phase/occupation triggers and contingency, and omits the M2 Junction 1 improvement identified by National Highways. The submitted Hoo quantum is therefore not yet tied clearly enough to the transport infrastructure on which the capacity conclusion depends.	Amend criteria 6 and 13-15 so each phase is linked to necessary transport infrastructure; add the relevant M2 Junction 1 requirement; require infrastructure to be funded/secured with an agreed delivery programme before the dependent occupation threshold, identifying which Hoo sites and maximum dwelling quantum can proceed before each scheme; and require rephasing/occupation control or alternative mitigation if delivery slips. If the necessary transport package cannot be demonstrated before soundness, delete or substantially reduce/rephase the affected Hoo allocation/quantum.	Necessary to prevent Hoo allocations being retained at a scale which the Plan has not demonstrated can be effectively supported.
MM-TIG-M9-02	Policy DM15 / Monitor and Manage	DM15 does not sufficiently define measures underpinning lower trips, cumulative monitoring, infrastructure triggers or responses to higher trips/delayed modal shift; contribution discounts are contemplated before the monitoring framework is established.	Link lower-trip assumptions to deliverable measures/infrastructure; define monitoring responsibility, baseline, review frequency and triggers; require additional mitigation, phasing/occupation controls, reduction of dependent development or review where thresholds are exceeded; and remove/suspend discounts unless necessary mitigation remains deliverable and funded.	Necessary to make DM15 precise and effective.

EX-TIG-M9-03	Integrated transport delivery schedule	Critical schemes are dispersed across the STA, IDP, National Highways SoCG and later examination documents without one reconciled delivery schedule.	Before soundness is concluded, provide a schedule identifying each relied-upon intervention's interim/full scope, cost, development/occupation trigger, delivery body, secured/prospective funding, approvals/dependencies, programme and contingency. Include Four Elms, Main Road Hoo, Sans Pareil, M2 Junctions 1 and 4 (and relevant monitoring at Junction 3) and the Hoo sustainable transport/BRT package. Where the schedule cannot demonstrate delivery in time, apply MM-TIG-M9-01.	Necessary to demonstrate delivery when required.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19	TIG Main Representation responding to the Regulation 19 Local Plan	Sections 2.3, 3.3.2, 5.5 and 8.3
E.37	TIG Regulation 19 representation entries	SDLP 111, 112, 114, 117 and 118
A1	Submission Medway Local Plan 2041	Paras 9.2.1-9.2.15 and 9.4.1-9.4.7; Policies DM15, DM17, DM18 and SA8
MLP/ED2	Regulation 19 representations in Plan order	Network Rail E.164 / SDLP 962, 965 and 973
A10.3	Schedule of Representations Received under Regulation 20 v2	E.184 / SDLP 1201-1204 and 1216-1217
A12.2 / MLP/ED20	Statements of Common Ground with National Highways	A12.2; MLP/ED20 sections 2.1-2.8 and 4.1.6-4.1.8
B2	Infrastructure Delivery Plan (December 2025)	Sections 2.7, 2.9 and 3.2 (including Rail); Appendix 1 pp.95-97
B18.1	Strategic Transport Assessment - Forecasting Report	Sections 9-10
B18.2	Mode Shares and Trip Rate Assessment Tool	Sections 3.7-3.9
B18.3	Mode Share Strategy	Section 11
B18.6	Strategic Transport Assessment - Proportionality Assessment	Section 3

B18.7	Strategic Transport Assessment - Junction Modelling and Mitigation Report	Section 16
B22.9	Vehicle Trip Budget Topic Paper	Section 2.1
MLP/ED26	Medway 2031 Interim Junction Modelling & Mitigation Report	Section 5 and Table 5-1
MLP/ED31	Proposed Stepped Housing Requirement and Land Supply	Proposed strategic policy, pp.1-2
MLP/ED35	Inspectors' Matters, Issues and Questions - Phase 2	Matter 9, MIQs 9.1-9.12, 9.32-9.35 and 9.39
MLP/ED38	Technical Note - Strategic Transport Assessment - Justification for Stepped Housing Trajectory	pp.1-6

7. APPENDIX

7.1 No appendix is proposed.

SUBMITTED ON BEHALF OF THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

Councillor Michael Pearce

Councillor Michael Pearce
Planning Spokesman
29 October 2026

**For the avoidance of any doubt, Councillor Michael Pearce is an Independent Councillor representing Hoo & High Halstow Ward on Medway Council, which is also the Local Planning Authority (LPA). He serves as the Leader and Planning Spokesman for The Independent Group (TIG) on Medway Council - an unwhipped group of Independent councillors representing the Hoo Peninsula (Strood Rural Ward, Hoo & High Halstow Ward, All Saints Ward), formed for administrative purposes and committee entitlement. While Councillor Pearce is a Medway Councillor and member of the LPA's Planning Committee, he does not speak or act on behalf of Medway Council or the LPA, either generally or at formal planning inquiries.*