Medway Local Plan Examination

Matter 13: Site Allocations (Policies SA1-SA14)

On behalf of Rosconn Group and St John's College (Ref E.82)

savills

Introduction

1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of Rosconn Group (the promoter) and St John's College (the landowner). Rosconn are promoting Site SR4 (North Little Church Road, west of Town Road, Cliffe Woods) which is identified for up to 130 dwellings in Policy SA11 (Rural Settlements). Rosconn and St John's College are broadly supportive of the Plan and its spatial strategy, however, we have concerns that a number of the development management policies are not sound but can be made so with the changes we have suggested.

1.2. This Statement specifically addresses our comments on Policy SA11: Rural Settlements which forms part of Matter 13.

Question 13.133: What is the justification for the overall approach to growth in the rural settlements?

1.3. As set out in our representations on the spatial strategy, we believe that there is justification for growth in rural settlements in order to ensure that there are smaller sites available for development which can be delivered more quickly than larger strategic sites, thereby helping maintain a 5-year housing land supply, particularly in the first 5 years from adoption (Policy SA11 identifies Site SR4 to deliver within Years 1-5 of the Plan period). They also assist in providing opportunities for SME housebuilders and diversify the housing market, helping meet the housing needs of those that want to stay in their local area and support and improve rural services and facilities in those settlements. This is consistent with paragraphs 73 and 83 of the NPPF 2024.

Question 13.134 How does the distribution of growth, as set out in Policy SA11, relate to the settlement hierarchy and wider spatial development strategy of the Plan?

1.4. This is a matter for the council, however, Site SR4 is proposed to be allocated at Cliffe Woods,a key rural centre that benefits from a number of services and facilities, as confirmed by the Medway Village Infrastructure Audit 2025 included in the evidence base. It is a sustainable location where further development is considered appropriate, as supported by the Sustainability Appraisal.

Question 13.135 How were individual sites selected and what alternatives were considered?

1.5. This is a matter for the council. This is addressed in the Land Availability Assessment and Sustainability Appraisal.

Question 13.136 Is the scale of growth proposed for each settlement proportionate to its role, function and level of services?

1.6 We consider that the scale of growth proposed for Cliffe Woods is proportionate to its role, function and level of services. Cliffe Woods is one of the larger centres of population within the rural area of the District and benefits from a number of services and facilities including a school, pharmacy and GP surgery which demonstrate the sustainability of its location. The evidence base also recognises the benefits of directing growth to the rural area, principally helping residents access a choice of housing to meet local needs and supporting improvements to local infrastructure to ensure the future vibrancy of its villages.

Question 13.137 What evidence supports the distribution of development between the various settlements?

1.7 For the Rural Areas, the Village Infrastructure Audit supports the allocations that have been made across the Rural Settlements.

Question 13.138 What assessment has been undertaken of cumulative impacts arising from the allocations across the rural settlements?

1.8 This is a matter for the council. However, Chapter 16 of the Sustainability Appraisal deals with the cumulative effects of the proposed locations and Appendix K In particular, Site SR4 at Cliffe Woods performs the best of the rural sites allocations as set out in Table K.2.11.

Question 13.139 How have impacts on landscape character, biodiversity, heritage assets and the setting of settlements been assessed and taken into account?

1.9 The Council has prepared a number of evidence base documents including a Landscape Character Assessment, Heritage Asset Review amongst others which demonstrate how the above matters have been assessed and taken into account. Our Regulation 19 representations set out our position on landscape, ecology and heritage in relation to site SR4. These confirm that there are no constraints to the development of the site in this regard.

Question 13.140 Are mitigation measures identified within Policy SA11, in reference to Policies S2 and S3, effective and deliverable?

1.10 The mitigation measures set out in Policy SA11 simply require those sites that are allocated to comply with policies S2 and S3. The site allocations have, following assessment through the SA and HRA, been determined such that they avoid impacts on ecological sites or can be mitigated through appropriate surveys and assessments as part of the planning application process.

Question 13.141 Can existing local infrastructure, services and facilities accommodate the proposed growth?

1.11 The Council has a number of Statements of Common Ground with the appropriate infrastructure providers, including National Highways and Southern Water. These documents confirm that there is a need for additional local infrastructure, however, this does not prevent the proposed growth being accommodated. These matters relate to timing and would be dealt with through phasing on individual planning applications.

Question 13.142 What improvements to existing infrastructure are required and how will they be secured?

1.12 The impacts on infrastructure will be local in relation to Cliffe Woods, rather than requiring any strategic level infrastructure to be in place prior to development commencing, as confirmed by the Infrastructure Delivery Plan. . Any contributions towards localised improvements necessary to make the development proposals acceptable in planning terms can be secured via Section 106 agreement at the planning application stage.

Question 13.143 Have the implications for highway safety and accessibility been adequately assessed?

1.13 Medway are the relevant highway authority and have assessed the proposed site allocations and concluded that these are deliverable and are acceptable from a highway safety and accessibility perspective.

Question 13.144 Have education, healthcare and wastewater implications been adequately assessed and addressed?

1.14 As stated above the impacts on education can be mitigated through Section 106 contributions at the time of individual planning applications. There is a Statement of Common Ground with Southern Water confirming that the proposed growth can be accommodated in terms of wastewater. Policy S24 concerns infrastructure delivery and sets out how contributions will be secured to support infrastructure in accordance with the relevant tests.

Question 13.145 Are all allocated sites within Policy SA11 available, suitable and achievable?

1.15 We can confirm that site SR4 at Cliffe Woods is available, suitable and achievable, as confirmed by the Land Availability Assessment (LAA). The single landowner has full control of the site, it is being actively promoted by Rosconn Group and the site has no insurmountable constraints to its development. The site is adjacent to land to the north which has recently been constructed and this site would be a logical extension to that development and the wider village.

Question 13.146 What evidence demonstrates that development can be delivered within the Plan period and in accordance with the housing trajectory?

1.16 The LAA demonstrates the site is available, suitable and deliverable. The landowner has appointed Rosconn Group as promoter for the site and relevant surveys are being carried out to support a planning application for the development of the site shortly. We anticipate that an application can be submitted in 2027, subject to the progress of the Local Plan.

Question 13.147 Does Policy SA11 provide a sufficiently clear and effective framework for decision-making?

1.17 As stated in our Regulation 19 representations, we believe the policy should refer to ‘circa’ 130 dwellings rather than ‘up to’. This allows flexibility and to boost the supply of housing as set out in paragraph 61 of the NPPF 2024. In addition, the name of the road in SR4 is incorrect and should be north of Lillechurch Road not Little Church Road.