Medway Local Plan 2041 Examination

Matter 9 – Transport

Hearing Statement

Medway Council

Issues

- **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.**

Introduction

This Hearing Statement has been prepared in response to the Inspectors' Matters, Issues and Questions for Phase 2 of the Examination of the Medway Local Plan 2041.

The Council's responses are set out under each question raised by the Inspectors. References are given to the submitted Plan, examination documents, evidence base documents and statements of common ground where relevant.

For ease of navigation, this Hearing Statement includes bookmarks and a linked table of contents.

Where the Council considers modifications necessary to improve effectiveness, clarity or consistency with national policy, these are identified in this Hearing Statement.

Artificial Intelligence

Artificial Intelligence (AI) was used to assist in the preparation of this Hearing Statement.

Specifically, Microsoft 365 Copilot (GPT-based large language model) was used to assist with drafting, editing and refining text, improving structure and summarising planning policy and guidance.

The source material used by the AI system comprised publicly available planning documents and information provided by the Council's officers, including the Plan (ref:

A1), submitted evidence base documents, the National Planning Policy Framework (2024), Planning Practice Guidance and the Inspectors' Matters, Issues and Questions.

AI was used solely as a drafting and editorial aid. All factual content, planning judgements, conclusions, references, quotations and positions presented in this Hearing Statement have been reviewed, checked and approved by the Council. The Council accepts full responsibility for the content of this submission.

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Questions

Transport Strategy and Capacity

9.1 What evidence demonstrates that the transport strategy can facilitate and accommodate the scale and distribution of development across Medway proposed by the Plan?

Council's response

9.1.1 The Council has submitted robust evidence, meeting the requirements of the National Planning Policy Framework (2024) and the Planning Practice Guidance, to demonstrate that the transport strategy can facilitate and accommodate the scale and distribution of development across Medway proposed by the Plan.

Evidence base

- Strategic Transport Assessment (refs: B18.1 to B18.12 inclusive)

Explanation

9.1.2 The Strategic Transport Assessment (STA) (refs: B18.1 to B18.12 inclusive) provides robust evidence to meet the requirements of the National Planning Policy Framework (2024) and the Planning Practice Guidance.

9.1.3 The Council's Regulation 18 (2024) consultation document set out a 'Vision for Access and Movement in Medway' (ref C2.1, PDF page 154-155, paragraph 9.1.5) which evolved, following responses to the consultation, into the statement in the submitted Plan (ref: A1, PDF page 164, paragraph 9.1.5). Following the publication of the NPPF in December 2024, which introduced a vision-led approach, the Council commissioned the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) and the 'Mode Share Strategy' (Stage 3) (ref: B18.3), dated January 2025 and May 2025 respectively. The work assessed the 100 proposed site allocations, grouped into 28 geographical clusters, and focused particular attention on the largest clusters that account for the vast majority of planned homes and employment growth.

9.1.4 Stage 1 (ref: B18.2, Chapter 2, PDF pages 7-16) established a comprehensive baseline of existing transport infrastructure, services, travel patterns and accessibility, concluding that approximately 70% of trips in Medway are currently undertaken by car. Stage 2 (ref: B18.2, Chapter 3, PDF pages 17-24) then developed a bespoke Trip Rate Assessment Tool (ref: B18.2, Appendix A, PDF pages 26-31), using GIS and transport data to assess the potential of each development cluster to reduce car dependency through existing and proposed sustainable transport infrastructure, including rail, bus, active travel networks and strategic initiatives such as Bus Rapid Transit (BRT). The

assessment identified varying levels of achievable modal shift, enabling evidence-based assumptions to be incorporated into transport modelling and ensuring that the impacts of growth were tested against realistic travel behaviours. Stage 3 (ref: B18.3) built upon this work by developing a vision-led strategy for each cluster, identifying the developer-funded interventions, mitigation measures, monitoring arrangements and planning obligations necessary to support sustainable travel choices and deliver the forecast mode shifts.

9.1.5 The STA scenario testing was an iterative process, starting with a scenario to inform the emerging Plan (ref: C2.16.1) and culminating with the 'Final Do Something' scenario, having applied modal shift assumptions based on the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) before identifying the necessary highway mitigations in the 'Junction Modelling and Mitigation Report' (ref: B18.7). Table 3-3 and Figure 3-3 of the 'Mode Shares and Trip Rate Assessment Tool' (ref: B18.2, PDF pages 23-24) show the reduced mode share of trips by car for clusters of sites with the introduction of a BRT service. For example, the Hoo Peninsula cluster would see a reduction in mode share of trips by car from 70% to 60%.

9.1.6 The 'Junction Modelling and Mitigation Report' confirms that "The BRT-led sustainable mitigation approach is at the heart of subsequent Do Something scenarios developed for Reg19 and as such an iDS scenario has been developed to assess the evolving spatial strategy assumptions and set the baseline upon which to determine where highway intervention (in additional to the BRT) may be required to mitigate the potential impact of the emerging growth." (ref: B18.1, PDF page 56). The 'Junction Modelling and Mitigation Report' (ref: B18.1, PDF page 60) notes that "The process of applying modal shift has been agreed in principle with KCC [Kent County Council] and NH [National Highways] prior to the development of the iDS and fDS models."

9.1.7 Paragraph 1.4.4 of the 'Statement of Common Ground with National Highways' (ref: MLP/ED20, PDF page 7) states that "National Highways and Medway Council have engaged from the outset of the local plan-making process to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN." Paragraph 2.1.3 of the 'Statement of Common Ground with National Highways' (ref: MLP/ED20, PDF page 8) states that "National Highways provided comments on draft STA documents, and these comments were taken into account prior to finalising STA documents. National Highways is content that the STA, subject to some continued joint working to evolve, finalise and agree all aspects (particularly concerning M2 junctions 1, 3 and 4) provide appropriate, proportionate evidence of how the methodology and assumptions applied to the Regulation 19 modelling and associated assessments have been developed and, in principle, agreed."

9.1.8 In conclusion, the STA found that:

- "… the Medway network has capacity for the proposed final Reg19 LP allocations, subject to the implementation of the proposed mitigations at the key eight junctions detailed in Section 8. Junction capacities and queues should be continually monitored, particularly on the A289 Pier Road/ A289 Vanguard Way in both directions." (ref: B18.1, PDF page 158, under 10.3.1).
- "Overall, the proposed modifications appear to address many of the congestion issues predicted in the 2041 scenarios. However, some junctions may require further optimisation or monitoring as traffic volumes increase." (ref B18.7, PDF pages 59-60).

Conclusion

9.1.9 The Council considers that the evidence demonstrating that the transport strategy can facilitate and accommodate the scale and distribution of development proposed by the Plan is contained principally within the Strategic Transport Assessment (STA) and its supporting evidence. The STA assessed the cumulative transport impacts arising from the proposed pattern of growth, including the strategic allocations, and identified the transport interventions necessary to support delivery of the Plan.

9.1.10 Consistent with paragraph 109 of the NPPF (2024), the Council has adopted a vision-led approach to identifying transport solutions. This approach includes a combination of sustainable transport measures, including Bus Rapid Transit, active travel infrastructure, travel planning and demand management measures, together with strategic highway improvements identified through the STA. These interventions were incorporated into the transport modelling and tested against the proposed scale and distribution of development.

9.1.11 The Council therefore considers that the STA provides proportionate evidence demonstrating that the proposed pattern of growth can be accommodated, subject to the implementation of the identified transport strategy and mitigation measures. Accordingly, the Plan is justified, because it is based on an appropriate and proportionate evidence base; effective, because the transport strategy provides a deliverable framework for supporting growth; and consistent with national policy, because it has been prepared in accordance with the vision-led approach promoted by paragraphs 109 to 111 of the NPPF (2024). The Council therefore considers that the Plan has been positively prepared and that the transport strategy is capable of facilitating and accommodating the scale and distribution of development proposed by the Plan.

9.2 How does the transport strategy support the Spatial Development Strategy, particularly the scale of growth proposed on the Hoo Peninsula and within regeneration areas?

Council's response

9.2.1 The transport strategy, which is predicated on internalisation and interventions to improve active travel and public transport, will help to deliver the Plan's spatial development strategy, particularly the scale of growth proposed on the Hoo Peninsula and within regeneration areas.

Evidence base

- Sustainability Appraisal – Volume 2 of 3 – Regulation 19 Report (ref: A3.2)
- Strategic Transport Assessment – Mode Shares and Trip Rate Assessment Tool (Stages 1 and 2) (ref: B18.2)
- Strategic Transport Assessment – Mode Share Strategy (Stage 3) (ref: B18.3)
- Strategic Transport Assessment – Junction Modelling and Mitigation Report (ref: B18.7)

Explanation

9.2.2 The second Regulation 18 consultation document presented three reasonable alternative 'Spatial Growth Options', namely 'Urban Focus', 'Dispersed Growth' and 'Blended Strategy'. The three options were derived from the Interim Sustainability Appraisal (refs: C.2.4.1 and C.2.4.2), which found that Urban Focus performed best in terms of promoting sustainable travel and efficient use of natural resources. However, the Blended Strategy, which evolved into the Plan's spatial development strategy, provided the most sustainable balance by combining urban regeneration with suburban and rural development, seeking to ensure a diverse range of housing types and tenures can be supported across Medway (ref: A3.2, PDF page 42).

9.2.3 In response to the Regulation 18 (2024) consultation, representations on behalf of the Church Commissioners set out a compelling case to allocate more land to the east of Ropers Lane, Hoo St Werburgh (HHH22 & HHH31) (ref: C2.3). The Council's planning officers considered that the addition of this site would help to achieve a critical mass to support self-containment / internalisation near site allocations for employment uses and a much-improved public transport offer for the Hoo Peninsula. This is consistent with paragraph 111a of the NPPF (2024), which requires planning policies to "support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities."

9.2.4 The revised NPPF introduced a vision-led approach in December 2024. The Plan's 'Vision for Access and Movement in Medway' (ref: A1, PDF page 164, paragraph 9.1.5) includes:

- "A growing network for active travel converges on urban centres …".
- "The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working,

while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport, realised through the early delivery of a Bus Rapid Transit corridor, connecting Hoo St Werburgh and Strood town centre."

9.2.5 The existing urban areas support local living and are well-served by public transport; they are inherently sustainable locations for growth, but they would not provide for the full range of housing types and tenures required.

9.2.6 Following the publication of the NPPF in December 2024, the Council commissioned the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) and the 'Mode Share Strategy' (Stage 3) (ref: B18.3), dated January 2025 and May 2025 respectively. The Mode Share Strategy (Stage 3) sets out the importance of internalisation (ref: B18.3, PDF page 15, Chapter 6). Appendix G of the Mode Share Strategy (Stage 3) (B18.3, PDF page 43) sets out a programme to deliver key interventions, i.e. Local Cycling and Walking Infrastructure Plan (LCWIP) routes delivered by 2031, internalisation by 2031 and a Bus Rapid Transit by 2036.

9.2.7 As noted in response to question 9.1, the 'Final Do Something' scenario applied modal shift assumptions based on the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) before identifying the necessary highway mitigations in the 'Junction Modelling and Mitigation Report' (ref: B18.7). Table 3-3 and Figure 3-3 of the 'Mode Shares and Trip Rate Assessment Tool' (ref: B18.2, PDF pages 23-24) show the reduced mode share of trips by car for clusters of sites with the introduction of a BRT service, with the Hoo Peninsula and Chatham/Rochester/Strood clusters seeing a reduction in mode share of trips by car from 70% to 60% and 70% to 50% respectively.

9.2.8 In this way, the transport strategy will help deliver the Plan's spatial development strategy, particularly the scale of growth proposed on the Hoo Peninsula and within regeneration areas.

Conclusion

9.2.9 The Council considers that the evidence demonstrating that the transport strategy can support the Spatial Development Strategy is contained principally within the Strategic Transport Assessment (STA) and its supporting evidence base. The STA assessed the cumulative transport impacts arising from the Plan's proposed scale and distribution of development and tested the implications of the strategic site allocations and wider growth strategy.

9.2.10 Consistent with paragraph 109 of the NPPF (2024), the Council adopted a vision-led approach to identifying transport solutions. The resulting transport strategy incorporates a package of measures including Bus Rapid Transit, active travel infrastructure, travel planning, modal shift measures and strategic highway

improvements. These measures were tested through the STA and informed the development of the final transport strategy.

9.2.11 The Council considers that the STA demonstrates that the Spatial Development Strategy can be accommodated, subject to the implementation of the identified transport interventions and mitigation measures. The transport strategy therefore supports the proposed scale and distribution of development and provides a deliverable framework for growth across Medway.

9.2.12 Accordingly, the Council considers that the Spatial Development Strategy is justified, because it is supported by proportionate transport evidence; effective, because the transport strategy identifies deliverable interventions capable of supporting growth; and consistent with national policy, because it has been prepared in accordance with the vision-led approach promoted by paragraphs 109 to 111 of the NPPF (2024). The Council therefore considers that the Plan has been positively prepared and that the transport strategy is capable of facilitating and accommodating the scale and distribution of development.

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

Council's response

9.3.1 The Council considers that the strategic highway, public transport, active travel and rail infrastructure requirements necessary to support the Plan have been identified on a proportionate basis.

Evidence base

- Duty to Cooperate Statement (ref: A11)
- Infrastructure Delivery Plan (ref: B2)
- Strategic Transport Assessment – Mode Share Strategy (Stage 3) (ref: B18.3)
- Strategic Transport Assessment – Merge and Diverge Assessment (ref: B18.4)
- Strategic Transport Assessment – M2 Junction Analysis Technical Note (ref: B18.5)
- Strategic Transport Assessment – Junction Modelling and Mitigation Report (ref: B18.7)
- Statement of Common Ground with National Highways (ref: MLP/ED20)

Explanation

9.3.2 Chapter 3.2 of the Infrastructure Delivery Plan (ref: B2, PDF pages 21-30), along with the Infrastructure Delivery Schedule (ref: B2, PDF pages 97-99), identify all strategic highway, public transport, active travel and rail infrastructure requirements to support the Plan. These infrastructure requirements have been assumed in the STA's 'Final Do Something' scenario and are described below.

Strategic highway

9.3.3 The strategic highway infrastructure requirements are set out throughout the STA's Junction Modelling and Mitigation Report' (ref: B18.7) for the following 10 junctions:

- Four Elms Roundabout;
- A228 Peninsula Way / Main Road Hoo;
- A228 Peninsula Way / Dux Court Road / Bell's Lane;
- A228 Peninsula Way / Roper's Lane / Ratcliffe Highway;
- Sans Pareil Roundabout;
- A2 High Street / Station Road (Strood);
- Dynamo Way Gyratory;
- Dock Road / Middle Street / Wood Street;
- M2 Junction 1; and
- M2 Junction 4.

9.3.4 The proposed mitigation design layouts and indicative costs are also presented in the STA's Junction Modelling and Mitigation Report (refs: B18.7, Appendix B and Appendix C respectively, PDF pages 901-916), while the approach to apportioning site-specific development contributions is set out in the STA's Proportionality Assessment (ref: B18.6, paragraph 4.2.2).

9.3.5 The STA's Merge and Diverge Assessment (ref: B18.4) and M2 Junction Analysis Technical Note (ref: B18.5) provide further information about the M2 junctions and provide the basis for the Statement of Common Ground with National Highways (ref: MLP/ED20). The Statement of Common Ground with National Highways (ref: MLP/ED20, PDF pages 12 and 19 respectively) refer to additional analysis concerning the cumulative impacts in Medway's and Gravesham's local plans on M2 Junction 1, which remains a matter under discussion.

9.3.6 The Council has commissioned additional M2 J1 analysis, i.e. including site allocations in Gravesham's pre-submission draft Local Plan and recent permissions in both Medway and Gravesham. This additional M2 J1 work will be available at the end of October. The Council considers that all evidence relating to the Plan is already before the Examination; the additional M2 J1 work is to facilitate ongoing cooperation and strategic planning concerning Gravesham's emerging Local Plan.

Public transport

9.3.7 Policy SA5 Strood Town Centre and Surrounds (ref: A1, PDF pages 264-265) refers to a 'transport interchange', likely to be located near to Strood rail station, which would provide a destination for a BRT corridor connection from Hoo St Werburgh. Criteria No.15 of the same policy refers to a funded transport study and the need for a masterplan. The transport interchange is at a conceptual stage and would need to be

taken forward by the Council's emerging Local Transport Plan. As noted in the Council's response to question 9.2, Appendix G of the Mode Share Strategy (Stage 3) (ref: B18.3, PDF page 43) sets out a programme to deliver key interventions, with a BRT operational by 2036; the Plan is not relying on the transport interchange in the first five years.

Active travel

9.3.8 Paragraph 9.3.5 of the Plan (ref: A1, PDF page 168) states that the LCWIP has identified cycling and walking improvements required at the local level.

9.3.9 Policy T20 'Riverside Path' and Policy DM16 'Chatham Waters Line' present clear aspirational opportunities for active travel, but neither is assumed in the STA's 'Final Do Something' scenario.

Rail infrastructure

9.3.10 The Council held its second Regulation 18 consultation during 15 July 2024 to 8 September 2024. Network Rail's Regulation 18 representations stated that:

- "The stations at Strood, Rochester, Chatham and Gillingham provide excellent connectivity between these Medway towns. The connectivity also provides access into London, either to London Bridge or to Abbey Wood through the Elizabeth Line. There are clear opportunities to enhance rail connections on the Hoo Peninsula. Should Medway pursue the level of housing delivery that has been set out for the Hoo Peninsula in the consultation documents, then the highlighted new passenger route and station will need to be fully funded by third parties. Network Rail is supportive of the safeguarding of the Grain Branch line and the possible location for a new station at Sharnal Street.
- Network Rail remains keen to work with the Council on how best to support the chosen growth strategy. This includes discussions over opportunities to improve existing rail stations to support development nearby. Station improvements should form part of any draft site allocations where this is triggered.
- … Network Rail has promoted two station car parks at Chatham and Gillingham stations which are available for development opportunities. These sites are in the most sustainable locations, being in town centres and adjacent to mainline rail stations. The Chatham car park site forms part of FP19 in the land availability assessment and the Gillingham car park site is GS30. These sites can also sustain a high density and are available within the first 5 years of the Plan. It is Network Rail's view that both of these site [sic] should be allocated in the new Local Plan as they are available and deliverable."

9.3.11 The Council held its Regulation 19 consultation during 30 June 2025 to 11 August 2025. The Council notes Network Rail's Regulation 19 representations (ref: C1.2) regarding engagement during Plan preparation. However, paragraph 28 of the NPPF

(2024) recognises that plans come forward at different times and that there may be a degree of uncertainty about the future direction of relevant development plans and the plans of infrastructure providers. In the Council's view, there has been constructive engagement with Network Rail.

9.3.12 The Record of Engagement Activity, which is attached to the Duty to Cooperate Statement (ref: A11, PDF page 38), includes two meetings with Network Rail: one on 19 March 2025 and another on 11 September 2025.

9.3.13 The first meeting was held with the author of Network Rail's Regulation 18 representations. Before finalising the Regulation 19 consultation document, the Gillingham car park site was rejected for allocation following correspondence with Network Rail's Property Team; it is unavailable for development. However, the Chatham station site was selected for allocation; it is site allocation reference FP25 (ref: A1, Policy SA1, PDF pages 251-254).

9.3.14 The second meeting was held with Network Rail's strategic planning team. As noted in Network Rail's representations to the Council's second Regulation 18 consultation, the Council recognises opportunities to improve existing rail stations to support development nearby. The second meeting considered a high-level specification for the redevelopment of Chatham Station, which should be in line with the Chatham Design Code (ref: B14). Criterion No. 13 states that "Site FP25 must be supported by a masterplan alongside a planning application." No further meetings have taken place. The Council submitted a revised housing trajectory as part of the Housing Delivery Topic Paper (B22.5, PDF page 17), in which site FP25 was phased back to Year 11 due to the limited progress and the complexity of the site.

9.3.15 More recently, the Council has engaged with Network Rail on a Station Travel Plan for two rail stations in Medway. A Station Travel Plan considers connections to the surrounding area and to other modes of transport, intended to align rail priorities with other plans. Council officers attended audits/fieldwork in preparing each Station Travel Plan. The Council has requested an update from Network Rail's team responsible for these emerging plans.

Conclusion

9.3.16 The Council considers that the strategic highway, public transport, active travel and rail infrastructure requirements necessary to support the scale and distribution of development proposed by the Plan have been identified through the Strategic Transport Assessment (STA), Sustainable Transport Strategy, Infrastructure Delivery Plan and engagement with key transport stakeholders. The evidence base identifies both the infrastructure required to mitigate the impacts of growth and the opportunities to promote sustainable travel in accordance with national policy.

9.3.17 The Council acknowledges that the detailed design, delivery mechanisms and funding arrangements for some infrastructure interventions will continue to evolve over the Plan period. However, neither the NPPF (2024) nor the Planning Practice Guidance require every transport intervention to be fully designed, funded or committed at the point of Plan adoption.

9.3.18 Accordingly, the Council considers that the Plan is justified, because it is supported by proportionate transport evidence; effective, because the necessary strategic transport infrastructure has been identified and incorporated within a deliverable transport strategy; and consistent with national policy, because it has been prepared in accordance with the requirements of paragraphs 109 to 111 of the NPPF (2024) and the relevant Planning Practice Guidance. The Council therefore considers that all strategic transport infrastructure requirements necessary to support the Plan have been identified on a proportionate basis.

Proposed Main/Minor Modification

9.3.19 No modification proposed.

Reason for proposed Main/Minor Modification

N/A

9.4 What are the principal transport constraints to growth and how will they be addressed?

Council's response

9.4.1 Three junctions are the principal transport constraints to growth because mitigation is required by 2031; however, interim schemes could be implemented as part of a Monitor and Manage Mitigation Strategy to be commissioned for Plan implementation.

Evidence base

- Strategic Transport Assessment – Proportionality Assessment (ref: B18.6)
- Strategic Transport Assessment – Junction Modelling and Mitigation Report (ref: B18.7)
- Medway Local Plan - Interim Year Assessment (ref: MLP/ED25)
- Medway Local Plan - Interim Year Assessment Medway 2031 Interim Junction (ref: MLP/ED26)
- Updated Proposed Stepped Housing Requirement and Land Supply (ref: MLP/ED30)
- Technical Note - Further Justification for Stepped Housing Trajectory based on Strategic Transport Assessment (ref: MLP/ED38)

Explanation

9.4.2 Among the strategic highway infrastructure requirements set out throughout the STA's Junction Modelling and Mitigation Report (ref: B18.7), three junctions are the principal transport constraints to growth:

- Four Elms Roundabout;
- A228 Peninsula Way / Main Road Hoo; and
- Sans Pareil Roundabout.

9.4.3 For context, while the A228 Peninsula Way / Main Road Hoo junction presents a constraint to growth on the Hoo Peninsula; all three junctions are part of the Major Road Network, i.e. the middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network and the rest of the local road network.

9.4.4 These three junctions are the principal transport constraints to growth because mitigation is required by 2031, as shown in Table 3-1 of the STA's Proportionality Assessment (ref: B18.6, page 11 of the PDF).

9.4.5 The STA's Junction Modelling and Mitigation Report identified substantial schemes required by the end of the Plan period:

- Four Elms Roundabout design at Figure 2-2 (ref: B18.7, PDF page 11).
- A228 Peninsula Way / Main Road Hoo design at Appendix B (ref: B18.7, PDF pages 902-906).
- Sans Pareil Roundabout design at Appendix B (ref B18.7, PDF page 910).

9.4.6 The associated cost estimates are set out at Appendix C of the STA's Junction Modelling and Mitigation Report (ref: B18.7, PDF page 915):

- Four Elms Roundabout cost range of £50m to £84m.
- Main Road Hoo cost range of £7m to £11m.
- Sans Pareil Roundabout cost range of £23m to £38m.

9.4.7 As explained in the 'Technical Note - Further Justification for Stepped Housing Trajectory based on Strategic Transport Assessment', these are significant infrastructure schemes, which will require time to develop, secure funding for, obtain approvals for and construct (ref: MLP/ED38, PDF page 2).

9.4.8 The Council commissioned additional work to identify interim schemes to ensure the Plan has been positively prepared, is justified and would be effective. The Council submitted two documents to the Examination during the Phase 1 hearings:

- Medway Local Plan - Interim Year Assessment (ref: MLP/ED25)

- Medway Local Plan - Interim Year Assessment Medway 2031 Interim Junction (ref: MLP/ED26)

9.4.9 MLP/ED25 describes the method for developing the 2031 Interim Year Assessment. MLP/ED26 sets out the traffic modelling outputs, including designs for three junctions that require mitigation by 2031.

9.4.10 Table 5-1 (ref: MLP/ED26, PDF page 20) shows that the full mitigation schemes would be required by 2036, which would allow more time for infrastructure delivery to facilitate new housing. However, this was not based on the housing trajectory proposed in the 'Updated Proposed Stepped Housing Requirement and Land Supply' (ref: MLP/ED30).

9.4.11 In Spring 2026, the Council provided the consultant with a housing trajectory to carry out traffic modelling to identify interim schemes. The housing trajectory comprised fewer homes coming forward by 2031; 20 sites, including three on the Hoo Peninsula, were phased back to start in 2032.

9.4.12 Both MLP/ED25 and MLP/ED26 are draft reports; following the 'Updated Proposed Stepped Housing Requirement and Land Supply' (ref: MLP/ED30), the Council instructed its consultant to update the traffic model based on the 'Updated Proposed Stepped Housing Requirement and Land Supply' (ref: MLP/ED30). The consultant has produced an update to Table 5-1 of MLP/ED26 (ref: PDF page 20):

	2031 LP (YR5) No Mitigation	2031 LP (YR5) Interim Scheme **Updated Trajectory**	2032 LP (YR6) Interim Scheme **Updated Trajectory**	2036 LP (YR10) Interim Scheme **Updated Trajectory**
Four Elms Roundabout	Significant impact from reference case.	Nil detriment compared to reference case.	Nil detriment compared to reference case.	Significant impact from reference case.
Main Road Hoo Roundabout	Significant impact from reference case.	Significant impact from reference case.	Significant impact from reference case.	Significant impact from reference case.
Sans Pariel Roundabout	Significant impact from reference case.	Nil detriment compared to reference case.	Minor impact compared with reference case.	Significant impact from reference case.

9.4.13 The updated modelling indicates a change from a minor to significant impact at the Main Road Hoo Roundabout, compared to Table 5-1 of MLP/ED26 (ref: PDF page 20). The Council's consultant has identified potential alternative lane arrangements for the Main Road Hoo mitigation scheme which could reduce the impact on the junction. The Council considers that the further investigation, assessment and refinement of such measures should form part of the proposed Monitor and Manage Mitigation Strategy to be commissioned for Plan implementation.

Conclusion

9.4.14 The Council considers that the principal transport constraints to growth in Medway are capacity pressures at key junctions on the highway network, existing congestion at strategic locations, limited public transport accessibility in some areas, and the need to reduce reliance on private car travel in accordance with national policy. These constraints have been identified and assessed through the Strategic Transport Assessment (STA) and supporting evidence.

9.4.15 The transport strategy responds to these constraints through a vision-led approach, consistent with paragraph 109 of the NPPF (2024), which combines sustainable transport measures, including Bus Rapid Transit, active travel infrastructure, travel planning and modal shift initiatives, with targeted highway improvements identified through the STA. The impacts of the proposed scale and distribution of development have been tested through transport modelling, which identified the mitigation measures necessary to support growth.

9.4.16 The Council therefore considers that the STA provides proportionate evidence demonstrating that the principal transport constraints to growth have been identified and that a deliverable package of interventions has been developed to address them. Accordingly, the Plan is justified, because it is supported by a proportionate evidence base; effective, because it identifies the transport infrastructure and mitigation necessary to support development; and consistent with national policy, because it has been prepared in accordance with the vision-led approach promoted by paragraphs 109 to 111 of the NPPF (2024). The Council therefore considers that the transport strategy is capable of facilitating and accommodating the scale and distribution of development proposed by the Plan, which is based on a stepped housing trajectory.

9.5 What contingency measures exist to deliver the required development growth if key transport schemes are delayed or not delivered?

Council's response

9.5.1 The Council does not consider that delivery of the Plan is dependent on any single transport intervention. The transport evidence base assumes a package of complementary measures, providing flexibility should the timing or delivery of individual schemes change during the Plan period. This approach is supported by the Hoo Consortium's Regulation 19 representations, including alternative highway cost estimates. Further flexibility is provided through the development management process, whereby Transport Assessments may identify additional or alternative mitigation measures, and through the proposed Monitor and Manage Mitigation Strategy, which will enable infrastructure delivery and occupation triggers to be reviewed throughout the plan period. In addition, the Council has already demonstrated contingency planning in relation to M2 Junction 4 by commissioning an interim

mitigation scheme, which the transport evidence concludes is operationally viable and capable of accommodating future traffic growth.

Evidence base

- Strategic Transport Assessment – Mode Shares and Trip Rate Assessment Tool (Stages 1 and 2) (ref: B18.2)
- Strategic Transport Assessment – Junction Modelling and Mitigation Report (ref: B18.7)
- Strategic Transport Assessment – M2 Junction 4 Cost Estimate Report (ref: B18.9)
- Statement of Common Ground with National Highways (ref: MLP/ED20)
- Hoo Consortium's Regulation 19 representations (ref: C1.2 – File K, PDF pages 51-162)

Explanation

9.5.2 Whilst there is no detailed 'Plan B' for every mitigation/intervention identified throughout the STA's Junction Modelling and Mitigation Report' (ref: B18.7), the Council considers that the transport evidence base is robust and proportionate, in line with the requirements of the National Planning Policy Framework (2024) and the Planning Practice Guidance.

9.5.3 The 'Final Do Something' scenario applied modal shift assumptions based on the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) before identifying the necessary highway mitigations in the 'Junction Modelling and Mitigation Report' (ref: B18.7). Therefore, the Plan is not dependent upon the delivery of any single transport intervention. Rather, transport impacts assume a package of complementary measures. This approach provides resilience and flexibility should the timing or delivery of individual schemes change during the Plan period.

9.5.4 There are two main forms of contingency. Alternative schemes for specific infrastructure improvement proposals and alternative measures to suppress demand for particular travel modes.

9.5.9 An example of an alternative scheme is a proposal for M2 Junction 4.

9.5.10 Chapter 2.5 of the Statement of Common Ground with National Highways (ref: MLP/ED20, PDF pages 13-15) sets out the position regarding M2 Junction 4. In short, an improvement to M2 junction 4 will be funded and delivered by the Lidsing Garden Community development in the Maidstone borough. National Highways' and Kent County Council's Regulation 19 representations noted that future development in the Capstone Valley depends on the Lidsing Garden Community coming forward. In response, Medway Council commissioned an interim/alternative mitigation scheme for M2 Junction 4, which is presented in the STA's 'M2 Junction 4 Cost Estimate Report' (ref:

B18.9). The STA's 'Junction Modelling and Mitigation Report found that "the proposed scheme is operationally viable and capable of managing future traffic growth without introducing significant congestion." (ref: B18.7, under paragraph 13.3.1, PDF page 52).

9.5.11 An example of alternative measures to suppress demand for particular travel modes are the proposals put forward by the Hoo Consortium.

9.5.12 The Hoo Consortium's Regulation 19 representations included:

- an Area-Wide Travel Plan (ref: C1.2 – File K, PDF pages 51-78);
- a Sustainable Transport Strategy (ref: C1.2 – File K, PDF pages 79-150); and
- alternative highway costs (ref: C1.2 – File K, PDF pages 157-162).

9.5.13 These three documents indicate that, if an interim or final highway mitigation scheme is delayed, there may be other measures to achieve the same outcomes such as enhanced bus services, travel planning, parking management measures and demand management initiatives.

9.5.14 Individual planning applications will be supported by Transport Assessments, which could lead to alternative mitigation being identified and secured through the development management process should strategic assumptions change.

9.5.15 Paragraphs 9.2.6, 9.2.13 and 9.2.15 of the Plan (ref: A1, PDF pages 165-167) refer to a Monitor and Manage Mitigation Strategy, which is to be commissioned for Plan implementation. The Monitor and Manage Mitigation Strategy may identify occupation thresholds linked to infrastructure triggers. For example, later phases of large allocations may not be occupied until specified transport improvements are delivered.

Conclusion

9.5.16 In line with national policy, the Council's approach does not rely upon absolute certainty regarding the timing of every individual transport scheme. In addition, when determining planning applications for individual schemes the Council is able to consider alternative means of achieving transport objectives, such as measures to suppress travel demand for particular modes of transport.

Policy DM15: Monitoring and Managing Vehicle Trip Generation

9.6 What evidence demonstrates that the approach to monitoring and managing vehicle trip generation is necessary in addition to Transport Assessments and Travel Plans?

Council's response

9.6.1 Transport Assessments and Travel Plans typically operate at the site level, whereas Policy DM15 is intended to provide a mechanism for monitoring cumulative impacts arising from multiple developments across Medway. The Strategic Transport

Assessment (STA) is based on forecast trip generation and modal shift assumptions, and Policy DM15 provides a means of reviewing those assumptions as development is delivered.

9.6.2 The Council considers that a monitor and manage approach is justified because the Plan period extends over many years and travel behaviour, infrastructure delivery and development phasing may change over time. Policy DM15 therefore provides a strategic monitoring framework rather than duplicating the role of Transport Assessments and Travel Plans.

9.6.3 The Council considers that Policy DM15 supports the effectiveness of the transport strategy by enabling ongoing review of transport outcomes throughout the Plan period.

9.7 How have the thresholds and triggers referred to in Policy DM15 and the supporting text been derived?

Council's response

9.7.1 The thresholds and triggers are intended to be informed by the assumptions contained within the Strategic Transport Assessment and subsequent monitoring of traffic flows, network performance and development delivery.

9.7.2 The Council acknowledges that the submitted policy does not clearly explain how thresholds and triggers would be established in practice.

9.7.3 The Council would support a modification requiring thresholds and triggers to be defined through the proposed Medway-wide Monitor and Manage Mitigation Strategy.

9.8 How would the policy operate where monitored trip generation differs materially from that forecast in supporting transport evidence?

Council's response

9.8.1 Where monitoring identifies material differences between forecast and observed trip generation, the Council would review the findings alongside infrastructure providers, developers and the highway authorities.

9.8.2 The purpose of Policy DM15 is to provide an evidence base for considering whether additional mitigation measures, revised phasing arrangements or transport interventions are required.

9.8.3 The policy therefore provides a mechanism for responding to changing circumstances rather than assuming that forecast trip rates will always be achieved.

9.9 What mechanisms exist to secure additional mitigation where monitoring identifies greater impacts than originally anticipated?

Council's response

9.9.1 The principal mechanisms are the development management process, planning conditions, planning obligations, infrastructure delivery programmes and future reviews of transport mitigation strategies.

9.9.2 Where monitoring identifies greater impacts than anticipated, the Council would work with developers, infrastructure providers and transport authorities to identify proportionate mitigation measures.

9.9.3 Policy DM15 is intended to provide the evidence base for such interventions rather than securing mitigation directly.

9.10 How will cumulative impacts from multiple developments be monitored and attributed?

Council's response

9.10.1 Policy DM15 is intended to focus on cumulative impacts at the network level, rather than attributing impacts solely to individual developments.

9.10.2 Monitoring would be informed by development completions, traffic data, transport modelling outputs and network performance indicators.

9.10.3 The Council acknowledges that detailed methodologies for attribution are not currently defined and would be developed through the proposed Medway-wide Monitor and Manage Mitigation Strategy.

9.11 Who would be responsible for collecting, maintaining and reviewing monitoring data and for producing and maintaining mechanisms for doing so, such as the envisaged Medway-wide Monitor and Management Mitigation Strategy?

Council's response

9.11.1 The Council would be responsible for coordinating monitoring and maintaining the Monitor and Manage Mitigation Strategy, working with the highway authorities, infrastructure providers and developers where appropriate.

9.11.2 Monitoring would be overseen through existing governance arrangements, including the Strategic Infrastructure Group, and informed by the Authority Monitoring Report and Infrastructure Delivery Plan.

9.11.3 The Council would therefore act as the lead coordinating body for the monitoring framework.

9.12 Is Policy DM15 sufficiently precise and effective to be implemented consistently through the development management process?

Council's response

9.12.1 The Council considers that the objective of Policy DM15 remains justified. However, the Council acknowledges that greater precision is required regarding monitoring responsibilities, thresholds, triggers, intervention measures and the operation of the proposed Monitor and Manage Mitigation Strategy.

9.12.2 The Council would therefore support modifications to clarify these matters and strengthen the relationship between Policy DM15, the Strategic Transport Assessment and the proposed monitoring framework.

9.12.3 Subject to such modifications, the Council considers that Policy DM15 would be effective and capable of consistent implementation through the development management process.

Policy T20: Riverside Path

9.13 What evidence demonstrates the need for the Riverside Path? Is it necessary or is it aspirational?

Council's response

9.13.1 The Riverside Path is both a strategic aspiration and a planned piece of infrastructure that supports the Plan's transport, recreation and regeneration objectives. It responds to longstanding ambitions to improve public access to Medway's waterfront, strengthen walking and cycling connectivity, and secure public benefits from riverside redevelopment opportunities. The Council considers the policy will help coordinate delivery and safeguard opportunities that might otherwise be lost through piecemeal development.

9.14 How does the proposed route contribute to the Plan's transport, recreation and regeneration objectives?

Council's response

9.14.1 The Riverside Path contributes to the Plan's transport objectives by improving opportunities for walking and cycling and helping to connect communities with employment, leisure and transport destinations. It contributes to recreation objectives by improving public access to the river and supporting health and wellbeing through active travel opportunities. The route also contributes to regeneration objectives by enhancing the attractiveness and accessibility of riverside locations and helping to integrate waterfront development with surrounding communities.

9.15 What sections of the route rely on third-party land ownership and how will access to these sections be secured?

Council's response

9.15.1 A Riverside Path would pass through a number of areas that are not under Council ownership. Therefore, the route and delivery will require cooperation with landowners, developers, infrastructure providers and other partners. The Council expects opportunities for delivery to arise through the implementation of site allocations, regeneration proposals, planning applications, public realm improvements and negotiated agreements with landowners. The route is therefore intended to be delivered incrementally as opportunities arise over the Plan period and the policy provides a framework for safeguarding and securing these opportunities as development comes forward.

9.16 Have constraints relating to operational river uses, port activities, ecology, flood risk or land ownership been identified and fully assessed? If so, how?

Council's response

9.16.1 The Council recognises that operational river uses, port activities, ecology, flood risk and land ownership constraints exist along parts of the route. The policy was not intended to fix a detailed route alignment at this stage and therefore detailed assessment of constraints will be undertaken as individual sections come forward. The Council considers that these constraints can be addressed through route design, alternative alignments and the development management process.

9.17 How will gaps in provision of the Riverside Path route be addressed where delivery cannot be secured?

Council's response

9.17.1 Where delivery of individual sections cannot be secured immediately, the Council would seek alternative alignments, temporary connections or phased delivery solutions where appropriate. The intention is for the route to be delivered incrementally over time rather than requiring all sections to be completed simultaneously. The policy therefore recognises that delivery may occur in phases over the Plan period.

9.18 Is there sufficient certainty that the Riverside Path can be delivered within the Plan period? If so, how that been demonstrated?

Council's response

9.18.1 The Council considers that there is a reasonable prospect of substantial progress being made towards delivery of the Riverside Path during the Plan period. This is based on the number of riverside allocations, regeneration proposals and development opportunities included within the Plan that can contribute towards delivery. However, the Council does not rely upon completion of the entire route to demonstrate the soundness of the Plan.

9.19 Is Policy T20 sufficiently flexible where parts of the route prove undeliverable?

Council's response

9.19.1 Yes. The Council considers that Policy T20 should be interpreted as supporting the delivery of the Riverside Path corridor rather than fixing a precise route alignment. This allows flexibility where physical, operational or land ownership constraints arise. Alternative alignments may therefore be considered where they achieve the overall objectives of the policy.

9.20 Is the full route shown on the Policies Map and, if not, how will route alignment be determined?

Council's response

9.20.1 No. The Riverside Path is not shown on the Policies Map. The Council considers that the precise alignment of the Riverside Path should be determined through the development management process, taking account of land ownership, operational river uses, ecology, flood risk, site constraints and opportunities arising through redevelopment proposals. The policy is intended to establish the principle of improving public access and connectivity along the River Medway rather than fixing a detailed route alignment at the plan-making stage. The Council considers that this approach provides flexibility whilst allowing individual sections of the route to come forward incrementally as opportunities arise during the Plan period.

9.21 Are main modifications required to improve clarity regarding delivery, safeguarding or route alignment?

Council's response

9.21.1 Yes. The Council considers that a Main Modification would improve the effectiveness of Policy T20. The modification should clarify that the Riverside Path represents a strategic route corridor, that delivery may occur incrementally, and that detailed route alignment will be determined through the development management process having regard to operational, environmental, flood risk and land ownership constraints. Such a modification would improve clarity regarding delivery, safeguarding and route alignment whilst retaining the overall objective of the policy.

Policy DM16: Chatham Waters Line

9.22 What is the purpose of the Chatham Waters Line and how does it support the wider transport strategy?

Council's response

9.22.1 The purpose of Policy DM16 is to protect the opportunity to maximise opportunities for sustainable travel. As per paragraph 9.3.8 of the Plan, "The disused

Chatham Waters Line to Gillingham station could make a significant contribution to the place-based vision for access and movement, for example as an active travel corridor or transitway. It provides a significant opportunity to address the severance between communities, and to enhance links between neighbourhoods, through improved walking and cycling routes." (ref: A1, PDF page 169). The STA's 'Mode Shares and Trip Rate Assessment Tool', Chatham Docks will need to achieve a mode shift of 10% away from the car (ref: B18.2, Table 3-3, PDF page 23).

9.22.2 The Chatham Waters Line is a prime example of the potential for sustainable transport to reduce the need for strategic highway requirements. Paragraphs 9.2.6, 9.2.13 and 9.2.15 of the Plan (ref: A1, PDF pages 165-167) refer to a Monitor and Manage Mitigation Strategy, which is to be commissioned for Plan implementation.

9.23 What evidence demonstrates a need for safeguarding the route?

Council's response

9.23.1 Paragraph 111c of the NPPF (2024) states that planning policies should "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development."

9.23.2 Site SMI6 (Chatham Waters) is allocated for 2,200 homes within the Plan period; the full scheme would comprise 3,000 homes. Chatham Waters will deliver more homes than any other site allocated in the Plan.

9.23.3 The Chatham Waters Line is a prime example of the potential for sustainable transport to instigate sustainable travel behaviours.

9.24 What evidence supports the proposed alignment?

Council's response

9.24.1 The proposed alignment follows the existing disused line alignment, which is in a deep cutting. At the southern end, it would terminate at Railway Street for Gillingham Rail Station and Gillingham High Street.

9.25 What assessment has been undertaken of feasibility, deliverability and likely demand?

Council's response

9.25.1 The Chatham Waters Line is identified as a potential active travel corridor which could improve connectivity between Chatham Waters, Gillingham town centre and surrounding communities through the reuse of a disused railway alignment. The Council previously sought external funding to support the project, which demonstrates an aspiration to deliver the route. However, the Council acknowledges that no standalone feasibility study, detailed deliverability assessment or formal demand

assessment has been prepared specifically for the Chatham Waters Line as part of the Local Plan evidence base.

9.25.2 The Council's justification for identifying the Greenway is therefore primarily strategic rather than scheme-specific. The proposal is consistent with national and local objectives to increase opportunities for walking and cycling, improve sustainable connectivity and reduce reliance on car travel. The safeguarding and promotion of the corridor ensures that the opportunity remains available should funding and delivery mechanisms emerge in the future. Policy DM16 may help a bid to meet any future funding criteria.

9.25.3 The Council does not rely upon delivery of the Chatham Waters Line to demonstrate the overall soundness of the Plan. Rather, it is identified as a potential longer-term active travel improvement that could complement the wider sustainable transport network if brought forward. Accordingly, the absence of detailed feasibility, deliverability and demand evidence does not undermine the effectiveness of the Plan.

9.26 Have alternative alignments or transport solutions been considered, for example where any part of the proposed alignment may not be feasible, available or accessible and, if so, why were they discounted?

Council's response

9.26.1 The Council adopted its Local Cycling and Walking Infrastructure Plan (LCWIP) on 11 March 2025. The LCWIP identified 10 priority cycling routes, including routes No.5, 'Church Street to Sturdee Avenue, Gillingham' and No.7 'Dock Road, Chatham'. In addition, the LCWIP identified 14 priority walking routes, including the route No.6, 'Great Lines Heritage Park / Mill Road, Gillingham'. These routes connect Chatham Waters with Gillingham town centre.

9.26.2 The Chatham Waters Line is intended to be an exemplary active travel transitway. It would meet wider policy objectives, such as improving accessibility to open spaces by overcoming the severance of streets. Due to the scale of development on the Gillingham Waterfront, the Council considers that all active travel interventions will help to achieve the necessary mode shift assumptions based on the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2).

9.26.3 Between 9 June 2026 and Friday 31 July 2026, the Council held a consultation on six schemes as priority early routes and a range of potential improvements, including cycling route No. 5.

9.27 Is the line intended to be delivered during the Plan period or safeguarded for longer-term provision?

Council's response

9.27.1 The Council would like to see the line delivered during the Plan period. However, Policy DM16 principally seeks to safeguard the opportunity for delivery should funding and implementation mechanisms become available.

9.28 What land requirements and infrastructure constraints have been identified?

Council's response

9.28.1 The Chatham Waters Line is in the same sole ownership as the Chatham Waters site allocation (SMI6), i.e. Peel L&P.

9.28.2 The proposed alignment follows the existing disused line alignment, which is in a deep cutting, with long sections of vegetation and mature trees beside the disused line.

9.29 How will development affecting the safeguarded corridor be assessed?

Council's response

9.29.1 The Council considers that any planning application affecting the safeguarded corridor would need to demonstrate that it would not compromise the potential future use of the alignment for active travel, either through the loss of land, severance of the route, or the introduction of physical constraints that would prejudice future delivery. Relevant considerations would include the location, scale and design of development, the retention of sufficient land within the corridor, impacts upon connectivity along the alignment, and the effect upon the future feasibility and deliverability for active travel.

9.29.2 The Council acknowledges that Policy DM16 could provide greater clarity on how applications affecting the safeguarded corridor should be assessed. Accordingly, the Council would support a modification setting out the matters to be considered when determining proposals within the safeguarded area, including whether development would prejudice the future use for active travel. Such clarification would improve the effectiveness of the policy by providing a clearer framework for development management decisions.

9.30 Is there a realistic prospect of implementation and funding?

Council's response

9.30.1 In 2022, the Council submitted a £20 million bid for the 'Gillingham Open Lines' project through the Levelling Up Fund. The bid was unsuccessful, however it demonstrates the Council's commitment to the project, working in partnership with Peel L&P. A two-page extract from the bid has been attached as Appendix A to this Hearing Statement. The Council will respond to future funding opportunities to deliver the Chatham Waters Line / Greenway.

9.31 Is Policy DM16 effective and justified if a funding mechanism has not yet been identified?

Council's response

9.31.1 Neither the NPPF (2024) nor the PPG require every future intervention to be fully designed, funded or committed at the point of Plan adoption. The Council considers that Policy DM16 is both justified and effective notwithstanding that a specific funding mechanism has not yet been identified.

Policy DM17: Grain Branch

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

Council's response

9.32.1 The evidence before the Examination has not identified a clear justification for Policy DM17, nor has it demonstrated it is necessary to ensure the deliverability of the Plan. The Council has reviewed the Regulation 19 representations relating to Policy DM17 and considers that the policy should be deleted.

Explanation

9.32.2 Regulation 19 representations (ref: MLP/ED2) raised objections concerning:

- the need for the land to be safeguarded for a potential railway station;
- the limited prospect of funding and delivery;
- the need to address car dependency from the outset;
- the better prospects for improved bus connections to Strood Rail Station; and
- Network Rail's consideration of the Grain Branch as national strategic infrastructure in providing aviation fuel to Heathrow Airport, which may increase should expansion of Heathrow Airport go ahead.

9.32.3 Following the publication of the NPPF in December 2024, the Council commissioned the 'Mode Shares and Trip Rate Assessment Tool' (Stages 1 and 2) (ref: B18.2) and the 'Mode Share Strategy' (Stage 3) (ref: B18.3), dated January 2025 and May 2025 respectively. The Mode Share Strategy (Stage 3) sets out the importance of internalisation (ref: B18.3, PDF page 15, Chapter 6). Appendix G of the Mode Share Strategy (Stage 3) (B18.3, PDF page 43) sets out a programme to deliver key interventions, i.e. Local Cycling and Walking Infrastructure Plan (LCWIP) routes delivered by 2031, internalisation by 2031 and a Bus Rapid Transit by 2036. A new passenger rail service from Hoo St Werburgh is not part of the Mode Share Strategy.

9.32.4 The Plan (ref: A1, PDF page 169) refers to Network Rail's 'South East Route: Kent Area Route Study' (2018) at paragraphs 9.4.2 and 9.4.3 (ref: A1, PDF page 169). As part of the consultation in preparing the Kent Area Route Study, which occurred before the

preparation of the submitted Plan, the Council emphasised its potential role in making the Hoo Peninsula a sustainable location for growth, while maintaining freight movements during off-peak periods. Engagement with Network Rail's Strategic Planning Team found that a rail passenger connection at Sharnal Street presents the only opportunity to significantly increase rail capacity in Medway, supporting wider sustainable transport. Network Rail subsequently included the Grain Branch in the final Kent Area Route Study as part of Network Rail's 30-year strategic vision and options for third party funders. This led to the Council's bid to the government's Housing Infrastructure Fund, although funding was subsequently withdrawn; as a result, there is limited prospect of funding and delivery.

9.32.5 Detailed Regulation 19 representations on behalf of the Church Commissioners recommended that "any safeguarded provision for a railway station should be limited to circumstances where it can be demonstrated to be justified and deliverable, consistent with the Council's evidence base. In the absence of such evidence, the allocation should focus on delivering alternative sustainable transport measures in the early phases of development."

9.32.6 The Council recognises the better prospects for improved bus connections to Strood Rail Station, which is part of the Mode Share Strategy (ref: B18.3, Appendix G, PDF page 43).

Proposed Main Modification

9.32.7 The Council considers that Chapter 9.4, including Policy DM17, should be deleted, along with the associated 'Safeguarded Land for Transport Scheme' from the Policies Map (refs: A2.2 and A2.3).

Reason for proposed Main Modification

9.32.8 Deletion of Policy DM17 would focus on the measures identified in the Mode Share Strategy (ref: B18.3, Appendix G, PDF page 43), thereby improving the effectiveness of the Plan.

9.33 What assessment has been undertaken of future freight demand?

Council's response

9.33.1 Please see the Council's response to question 9.32.

9.34 Have future passenger opportunities been assessed and if so, what conclusions were reached?

9.34.1 Please see the Council's response to question 9.32

9.35 How has Network Rail informed preparation of the policy?

Council's response

9.35.1 Please see the Council's response to question 9.32.

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

Council's response

9.36.1 Please see the Council's response to question 9.32.

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

Council's response

9.37.1 Please see the Council's response to question 9.32.

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

Council's response

9.38.1 Please see the Council's response to question 9.32.

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

Council's response

9.39.1 Please see the Council's response to question 9.32.

Policy T21: Riverside Infrastructure

9.40 What infrastructure in particular is safeguarded by Policy T21?

Council's response

9.40.1 Policy T21 safeguards three categories of infrastructure. The specific facilities encompassed by these categories are identified within the evidence base, including the Minerals and Waste Topic Paper (ref. B22.11) and the River Medway Economic Frontages Uses Study (ref. C2.12).

Evidence base

- Minerals and Waste Topic Paper (B22.11)
- River Medway Economic Frontages Uses Study (ref: C2.12)

Explanation

9.40.2 The first paragraph of Policy T21 (ref: A1, PDF page 171) states that "Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy." The Minerals and Waste Topic Paper (ref: B22.11, paragraph 1.3.1, PDF page 11) identifies four wharves that are used for the importation of aggregates:

- Grain Terminal, Isle of Grain (wharf and rail depot)
- London Thamesport, Isle of Grain

- North Sea Terminal, Cliffe, Rochester (wharf and rail depot)
- Euro Wharf, Frindsbury, Rochester

9.40.3 The River Medway Economic Frontages Uses Study identifies 27 commercial facilities used for shipping (import and export of commercial goods and energy products), which are shown in Figure 3.1 (ref: C2.12, PDF page 18) and listed at Appendix C (ref: C2.12, PDF pages 134-135), including 'Scotline Crown Wharf berth 1' and 'Scotline Crown Wharf berths 2 and 3'. Please see the Council's response to question 9.43 regarding site allocation SMI6, Chatham Waters.

9.40.4 The second paragraph of Policy T21 (ref: A1, PDF page 171) states that "The existing network of piers, jetties, slipways, steps and stairs will be safeguarded …". The River Medway Economic Frontages Uses Study identifies 34 leisure facilities, including marinas, sailing and rowing clubs, piers and other pontoons and slipways, along with six supporting facilities, which are shown in Figure 3.1 (ref: C2.12, PDF page 18) and listed at Appendix C (ref: C2.12, PDF pages 134-135).

9.40.5 The third paragraph of Policy T21 (ref: A1, PDF page 171) states that "Gillingham Pier and Sun Pier will be maintained as commercial piers accessible for and supporting large historic vessels."

Conclusion

9.40.6 Whilst the supporting evidence identifies the types of infrastructure that Policy T21 seeks to safeguard, the Council acknowledges that the policy itself could provide greater clarity regarding the specific facilities and assets to which it applies. The Council would therefore support modifications to Policy T21 and/or its supporting text to improve the effectiveness of the policy, provide greater certainty for decision-makers and applicants, and ensure that the safeguarded infrastructure is clearly understood.

9.41 Have safeguarding boundaries been derived and assessed in relation to Policy T21 and if so, are these clearly shown on the Policies Map?

Council's response

9.41.1 Safeguarding boundaries have not been derived and assessed in relation to Policy T21.

9.42 What evidence demonstrates continuing operational need for the safeguarded facilities and their purposes?

Council's response

9.42.1 With regard to riverside infrastructure associated with the transport of minerals, the Local Aggregates Assessment states that Medway makes a critical contribution to the South East's infrastructure, particularly for the importation of marine dredged sand and gravel (ref: B20, paragraph 4.3, PDF page 19). The ability to handle large vessels and

their proximity to markets in the wider South East and London elevates the wharves' importance (ref: B20, paragraph 7.1, PDF page 32).

9.42.2 The River Medway Economic Frontages Uses Study identifies 11 opportunity areas for more intensive use of the riverfront, having considered the future of maritime activities more broadly (ref: C2.12, Figure 11.1, PDF page 102). For example, 'Area 4 Sufferance Wharf and Sun Wharf (Chatham Intra)' notes that several existing piers could provide for a riverfront promenade as part of wider regeneration plans and to boost local tourism (ref: C2.12, PDF page 105).

9.42.3 The Council acknowledges Regulation 19 representations from Scotline (ref: MLP/ED3). Scotline's wharves, deep-water berths and open storage areas are nationally significant assets that support employment, sustainable freight movement and national supply chains for timber. It seeks stronger recognition and protection of operational port infrastructure within the Plan, together with a regeneration strategy that integrates existing maritime businesses rather than assuming their relocation.

9.43 Is there any conflict between the safeguarding provisions of Policy T21 and regeneration proposals elsewhere within the Plan?

Council's response

9.43.1 As in Peel Waters' Regulation 19 representations (ref: MLP/ED3), any modifications to Policy T21 should clarify that it does not apply to site allocations for redevelopment, which could be achieved simply through the addition of the words "Unless allocated for alternative development" at the start of the policy.

9.43.2 Scotline's Regulation 19 representations are also relevant, which support regeneration but argue that it should be maritime-led rather than maritime-displacing (ref: MLP/ED3).

9.44 Under what circumstances would relocation or redevelopment of safeguarded infrastructure be acceptable?

Council's response

9.44.1 The Council considers that relocation or redevelopment of safeguarded infrastructure should be permitted only where it can be demonstrated that the infrastructure is no longer required for its safeguarded purpose, that equivalent or enhanced replacement provision will be delivered, or that redevelopment would not prejudice the continued operation, viability or future use of the infrastructure.

9.45 Is Policy T21 sufficiently precise to operate effectively in determining planning applications?

Council's response

9.45.1 The Council acknowledges that Policy T21 could be strengthened by setting out the circumstances in which loss, relocation or redevelopment of safeguarded infrastructure may be supported, thereby providing greater certainty for applicants and decision-makers and improving the effectiveness of the policy. Therefore, the Council would welcome suggested modifications to Policy T21.

Policy T22: Marinas and Moorings

9.46 What evidence supports additional marina and mooring provision?

Council's response

9.46.1 The evidence supporting additional marina and mooring provision is set out in the River Medway Economic Frontages Uses Study (ref: C2.12).

9.46.2 The study identifies the River Medway as a significant leisure and recreational asset and concludes that Medway's proximity to London and Surrey presents an opportunity for growth in leisure boating, given the relative scarcity and cost of marina facilities closer to London. The study finds that Medway is well positioned to attract additional demand due to its accessibility by both road and rail and identifies potential for growth through the expansion of existing facilities and the provision of new marina capacity as part of regeneration schemes. In particular, the study notes that additional marina space at locations such as Gillingham Marina and Chatham Docks could contribute towards the creation of a critical mass of boating and related leisure facilities, strengthening Medway's role as a regional destination for leisure boating and supporting wider economic, tourism and waterfront regeneration objectives (ref. C2.12, paragraph 10.73, PDF page 101).

9.46.3 In this way, the River Medway Economic Frontages Uses Study (ref: C2.12) identifies a strategic opportunity and market potential for additional marina and mooring provision, rather than relying solely on existing unmet demand, and supports the policy approach of safeguarding and enhancing riverside infrastructure capable of supporting leisure boating activities.

9.47 Has existing capacity and future demand for marina and mooring facilities been assessed?

Council's response

9.47.1 Paragraph 9.6.3 of the Plan states that "Existing marinas operate at or close to full capacity. Facilities for visiting vessels are currently limited, but there is significant potential for growth. It is recognised that better co-ordination between marina operators would improve Medway's leisure boating offer. Evidence at the regional level indicates that there is a shortfall of marina provision along the North Kent coast between Ramsgate harbour and facilities around the Medway Estuary." However, whilst

the Plan refers to regional evidence indicating a shortfall of marina provision between Ramsgate and the Medway Estuary, there is no specific supporting study before the Examination.

9.47.2 In preparing this Hearing Statement, the Council has identified a report by the Canal & River Trust[1] which shows that occupancy is high across most berth types, particularly residential and leisure, while coastal marinas generally have higher occupancy than inland ones. The report notes that average occupancy rates are somewhat lower in London and the South East compared to other regions. However, the average waiting list increased between 2022 and 2025 in London and the South East. A two-page extract of the report is presented at Appendix B of this Hearing Statement.

9.48 How does Policy T22 contribute towards tourism, recreation and economic objectives?

Council's response

9.48.1 Please see the Council's response to question 9.46.

9.49 How does the policy address potential impacts upon designated habitats and species?

Council's response

9.49.1 Policy T22 states that "Planning permission for marinas and moorings will be granted if the application demonstrates how the proposed development: ... Has specific regard to the SPAs, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone.

Proposed Main Modification

9.49.2 Natural England's Regulation 19 representations (ref: MLP/ED2) included a suggested modification to read: "Planning permission for marinas and moorings will be granted if the application demonstrates how the proposed development: ... Ensures that impacts to the SPAs, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone are avoided or fully mitigated."

Reason for proposed Main Modification

9.49.3 Natural England's suggested modification is supported by the Council and would make Policy T22 more effective and consistent with national policy.

[1] Canal and River Trust (2026). The UK Marina & Moorings Market, 2025. Available at: https://canalrivertrust.org.uk/media/document/gsNDohYBQ2uUr-gk6uK1ZQ/gDJmN0kZbeX_3f5pYOSQiDMaBCr5bWqfrFAupFMi7rM/aHR0cHM6Ly9jcnRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/0189adf7-81ad-7b66-8c1d-4ddab3937f6d.pdf [Last accessed 13 October 2026]

9.50 Have cumulative impacts on the Medway Estuary and river environment been assessed?

Council's response

9.50.1 The Submission Habitats Regulations Assessment screened-in Policy T22 as a 'Category L' policy, i.e. it might be likely to have a significant effect in combination, due to "the sensitive location of this infrastructure close to the Medway and Thames SPA and Ramsar sites and potential associated areas of FLL, urbanisation effects are possible." (ref: A4.1, Appendix C, PDF page 141).

9.50.2 The Submission Habitats Regulations Assessment concluded that there will be no adverse impacts on site integrity on any European site or areas of Functionally Linked Land, either alone or in-combination, as a result of urbanisation effects (ref: A4.1, paragraph 8.3.19, PDF page 94).

9.51 How does the policy align with marine and maritime planning objectives and relevant environmental legislation?

Council's response

9.51.1 Policy T22 seeks to support the provision of marinas and moorings whilst ensuring that proposals are compatible with the environmental, navigational and operational functions of the River Medway. The policy aligns with marine and maritime planning objectives by supporting the sustainable use of the river for leisure and recreational boating, recognising the economic and tourism benefits associated with marina development, and providing for water-based activity identified within the River Medway Economic Frontages Uses Study (ref: C2.12).

9.51.2 The policy also operates within the framework of wider marine and environmental regulation. Any proposal for a marina, mooring or related infrastructure would remain subject to relevant environmental legislation and consenting regimes, including assessment of potential impacts on designated habitats, biodiversity, water quality, flood risk, coastal processes, navigation and the historic environment, where applicable. Development proposals would also need to take account of the requirements of relevant marine planning policies and the responsibilities of statutory bodies, including the Marine Management Organisation and the Environment Agency.

9.51.3 The Council therefore considers that Policy T22 provides a positive framework for supporting appropriate marina and mooring provision whilst ensuring that proposals are subject to the necessary environmental and maritime safeguards through the planning application process.

9.52 How does Policy T22 balance economic benefits against environmental impacts and how will cumulative impacts be assessed?

Council's response

9.52.1 Policy T22 provides a framework for supporting appropriate proposals whilst ensuring that environmental constraints and statutory requirements are fully considered through the development management process. The policy recognises the potential economic, tourism and recreational benefits associated with marina and mooring provision, including support for leisure boating and the wider waterfront economy. However, these benefits must be balanced against potential impacts on biodiversity, designated habitats, water quality, navigation, landscape character, heritage assets and flood risk.

9.52.2 Environmental impacts will be assessed at the planning application stage having regard to all relevant legislation and policy requirements. Where applicable, proposals will be subject to Habitats Regulations Assessment screening and any further assessment required under the Conservation of Habitats and Species Regulations 2017 (ref: E3). Other environmental assessments may also be required depending on the nature, scale and location of the proposal.

9.52.3 The Council considers that cumulative impacts are most appropriately assessed at the project level, where the details of individual proposals are known. This would enable consideration not only of the direct effects of a proposal, but also its potential in-combination effects with other plans and projects. The policy therefore supports marina and mooring development in principle whilst relying on established environmental assessment processes to ensure that adverse effects, including cumulative impacts, are appropriately identified, assessed and mitigated.

Proposed Main Modification

9.52.4 The Council acknowledges that Policy T22 could be strengthened by expressly referring to compliance with environmental legislation and the need to consider cumulative impacts where relevant.

Reason for proposed Main Modification

9.52.5 Such a modification would improve the effectiveness of the policy without altering its overall objective of supporting appropriate marina and mooring provision.

9.53 How does Policy T22 relate to other policies in the Plan, such as Policy T7: Houseboats?

Council's response

9.53.1 Policy T7 seeks to manage provision for houseboats. The last paragraph of Policy T7 refers to wider criteria in Policy T22.

Proposed Minor Modification

9.53.2 The Council is proposing to insert the following sentence at the end of Policy T22: "Proposals concerning houseboats must adhere to Policy T7."

Reason for proposed Minor Modification

9.53.3 The Council considers that Policy T22 should be read in conjunction with Policy T7.

9.54 Is the policy sufficiently clear regarding residential moorings and long-term occupation?

Council's response

9.54.1 Please see the Council's response to question 9.53.

9.55 Is Policy T22 justified, effective and consistent with national policy?

Council's response

9.55.1 The Council considers Policy T22 to be justified, effective and consistent with national policy, subject to the proposed modifications set out in the Council's responses to questions 9.49, 9.52 and 9.53.

Policy T23: Aviation

9.56 What specific aviation facilities at Rochester Airport are safeguarded by Policy T23?

Council's response

9.56.1 Policy T23 is intended to safeguard the continued operation of Rochester Airport as a general aviation airfield. This includes the runway, taxiways, aircraft parking areas, hangars, operational buildings, navigation and safety infrastructure, and associated facilities supporting business, public service, training, heritage and leisure aviation activities. The policy is intended to protect the airport's operational function rather than safeguard specific individual structures.

9.57 What evidence demonstrates the need for continuing operational requirements of Rochester Airport?

Council's response

9.57.1 The need for the continuing operation of Rochester Airport is demonstrated by its existing role as an operational general aviation airport serving business, training, leisure, heritage and public service aviation functions. The policy reflects paragraph 111(f) of the NPPF (2024), which recognises the importance of maintaining a national network of general aviation airfields and their need to adapt and change over time. The Council therefore considers that the airport continues to perform a strategic aviation function within Medway and the wider region.

9.58 Have any safeguarding areas relating to Policy T23 been identified? If so, how were they derived?

Council's response

9.58.1 No specific safeguarding areas have been identified through Policy T23. The policy is intended to support the ongoing operation of the airport rather than establish a formal aerodrome safeguarding regime or identify safeguarding contours through the Local Plan. The policy safeguards the operational function of the airport, rather than defining a specific land safeguarding area.

9.59 Are safeguarding areas relating to Policy T23 shown on the Policies Map?

Council's response

9.59.1 No. The Policies Map identifies the airport itself but does not identify specific aviation safeguarding areas associated with Policy T23. The policy is concerned with supporting the airport's continued operation rather than establishing mapped safeguarding zones.

9.60 Is Policy T23 consistent with national aviation policy and guidance?

Council's response

9.60.1 Yes. The Council considers that Policy T23 is consistent with paragraph 111(f) of the NPPF (2024), which recognises the importance of maintaining a national network of general aviation airfields and their need to adapt and change over time. The policy supports the continued operation of Rochester Airport and its contribution to business, training, leisure, heritage and public service aviation uses.

9.61 Are the restrictions imposed by the policy proportionate?

Council's response

9.61.1 The Council considers that Policy T23 does not impose significant restrictions on development. Rather, it provides strategic support for the continued operation of the airport and recognises its role within Medway. The policy does not introduce detailed safeguarding controls or additional development management requirements beyond maintaining the airport's operational function.

9.62 How does the policy balance airport safeguarding with wider growth and regeneration objectives?

Council's response

9.62.1 The Council considers that Policy T23 supports both objectives. The policy seeks to maintain the operational function of Rochester Airport while allowing the airport to evolve and respond to changing aviation requirements. The Council does not consider that support for the airport is incompatible with the wider growth and regeneration objectives of the Plan, particularly given the airport's contribution to the local economy, skills, training and business sectors.

9.63 Is Policy T23 justified by proportionate evidence and is it effective?

Council's response

9.63.1 The Council considers that Policy T23 is justified by proportionate evidence because it reflects the existing operation of Rochester Airport, national policy support for general aviation airfields and the airport's established role within Medway. Whilst the policy is intentionally strategic rather than detailed, the Council considers that it is effective in recognising and supporting the airport's continued operation and future evolution consistent with national planning policy.

Policy T24: Urban Logistics

9.64 What evidence demonstrates the need for urban logistics facilities in Medway?

Council's response

9.64.1 Please see the Council's response to question 9.72.

9.65 How does Policy T24 differ from, and add to, the general employment land policies of the Plan?

Council's response

9.65.1 Please see the Council's response to question 9.72.

9.66 What role are urban logistics facilities expected to play in supporting future growth?

Council's response

9.66.1 Please see the Council's response to question 9.72.

9.67 Have suitable locations been identified and assessed?

Council's response

9.67.1 Please see the Council's response to question 9.72.

9.68 How does the policy support sustainable freight movement and last-mile delivery solutions?

Council's response

9.68.1 Please see the Council's response to question 9.72.

9.69 Are the policy requirements sufficiently clear for decision-making purposes?

Council's response

9.69.1 Please see the Council's response to question 9.72.

9.70 How does it contribute to sustainable freight movement?

Council's response

9.70.1 Please see the Council's response to question 9.72.

9.71 How will amenity, traffic and environmental impacts be addressed?

Council's response

9.71.1 Please see the Council's response to question 9.72.

9.72 Is Policy T24 justified by proportionate evidence and is it effective?

Council's response

9.72.1 The Council has reviewed Policy T24 in light of the Inspectors' questions.

9.72.2 The policy was included in the submitted Plan in response to concerns raised by the logistics sector regarding the loss of warehousing and distribution facilities nationally and the importance of such facilities in supporting modern freight and delivery networks.

9.72.3 However, the Council acknowledges that the evidence base does not contain a specific assessment of demand for urban logistics facilities in Medway, nor does it identify particular locations requiring safeguarding for this purpose. Furthermore, the policy does not clearly distinguish urban logistics facilities from the wider B8 storage and distribution uses already addressed through the Plan's employment policies. The Council also acknowledges that the policy provides limited guidance regarding sustainable freight movement, last-mile delivery, operational requirements or environmental impacts.

Proposed Main Modification

9.72.4 In light of these considerations, the Council considers that Policy T24 is not necessary to make the Plan sound and proposes its deletion through a Main Modification.

Reason for proposed Main Modification

9.72.5 The Council considers that deletion of Policy T24 would improve the effectiveness and clarity of the Plan.

9.72.6 Existing employment policies provide an appropriate framework for the protection and management of storage and distribution uses, and the Council has not identified proportionate evidence justifying a separate policy for urban logistics facilities.

9.72.7 Accordingly, the Council considers that Policy T24 is not required to ensure that the Plan is justified, effective or consistent with national policy.

Policy T25: User Hierarchy and Street Design

9.73 How does Policy T25 effectively implement the transport hierarchy contained within national policy?

Council's response

9.73.1 The Council has reviewed Policy T25 in light of the Inspectors' questions.

9.73.2 The policy was included in the submitted Plan to promote good street design and to reflect national best practice relating to movement, placemaking and sustainable transport. However, the Council acknowledges that many of the policy's requirements, including the application of the user hierarchy, are already established through national policy and guidance, notably paragraph 117(a) of the NPPF (2024).

9.73.3 The Council has not identified a specific local evidence base demonstrating the need for a separate policy containing these requirements, nor evidence showing that the policy would achieve outcomes beyond those already secured through national policy, guidance and the development management process. Furthermore, several criteria are capable of differing interpretation and the policy provides limited guidance on how competing demands between different transport modes should be balanced or how site-specific constraints should be addressed.

Proposed Main Modification

9.73.4 Delete Policy T25.

Reason for proposed Main/Minor Modification

9.73.1 The Council considers that deletion of Policy T25 would improve the clarity and effectiveness of the Plan. The objectives of the policy are already substantially addressed through the NPPF, national design guidance and other Local Plan policies, and the Council has not identified proportionate evidence justifying a standalone policy. Accordingly, the Council considers that Policy T25 is not required to ensure that the Plan is justified, effective or consistent with national policy.

9.74 Is the user hierarchy consistent with current Government guidance relating to active travel and street design?

Council's response

9.74.1 Please see the Council's response to question 9.73.

9.75 What evidence informed the street design requirements?

Council's response

9.75.1 Please see the Council's response to question 9.73.

9.76 How will conflicts between walking, cycling, public transport, servicing and private vehicle movements be resolved?

Council's response

9.76.1 Please see the Council's response to question 9.73.

9.77 Are the requirements of the policy sufficiently precise to ensure consistent application in development management decisions?

Council's response

9.77.1 Please see the Council's response to question 9.73.

9.78 Does the policy provide enough flexibility where site-specific constraints exist?

Council's response

9.78.1 Please see the Council's response to question 9.73.

Policy T26: Accessibility Standards

9.79 What evidence supports the accessibility standards set out in Policy T26?

Council's response

9.79.1 The accessibility standards set out in Policy T26 are based on a research paper by the Royal Town Planning Institute and guidance in the 'Streets And Transport In the Urban Environment' series by the Chartered Institute of Highways and Transportation. The preceding paragraphs, 9.10.1 to 9.10.3, to the policy itself contain endnote references to these documents (ref: A1, PDF page 177). Specifically:

- Research paper by the Royal Town Planning Institute: "The defining characteristic of the '15 minute neighbourhood' is that people are able to 'live local' and meet most of their daily needs within a 15 minute walk or cycle from their home. This includes, for example, access to schools, grocery shopping and places to socialise, exercise and work. The ability to 'live local' in this way reduces both the number and length of journeys made on a daily basis, resulting in significant carbon savings. It also creates the conditions for healthier, happier communities."[2]

[2] Royal Town Planning Institute (2021). Net Zero Transport: The Role of Spatial Planning and Place-Based Solutions. Available at https://www.rtpi.org.uk/media/seedm22d/rtpi-net-zero-transport-january-2021.pdf [PDF page 21] [Accessed 13 October 2026]

- Guidance by the Chartered Institute of Highways and Transportation: please see 'Table 4 - Recommended maximum walking distances to bus stops'.[3]

9.80 How were accessibility thresholds derived?

Council's response

9.80.1 Please see the Council's response to question 9.79.

9.81 Have the standards in the policy been tested through the Plan's viability evidence?

Council's response

9.80.1 The standards in the policy have not been tested through the Plan's viability evidence (ref: B5).

9.82 Are the standards realistic and achievable across all parts of Medway?

Council's response

9.82.1 The Council recognises that the standards should be applied proportionately having regard to the characteristics of individual sites and the differing circumstances that exist across Medway's urban, suburban and rural areas. The policy is therefore intended to guide the design and assessment of proposals rather than operate as an inflexible requirement that must be met in every circumstance.

Proposed Main Modification

9.82.3 The Council acknowledges that the policy could benefit from modifications to provide greater clarity regarding its operation, particularly in relation to brownfield regeneration sites, circumstances where accessibility improvements are planned but not yet delivered, and situations where site-specific constraints limit the ability to meet all standards.

9.82.4 The Council would therefore support amendments to make clear that proposals should seek to achieve the standards wherever reasonably practicable and demonstrate how accessibility will be maximised having regard to the site's context, characteristics and opportunities for future improvement.

Reason for proposed Main Modification

9.82.5 Subject to such modifications, the Council considers that Policy T26 remains justified and effective as a policy that promotes sustainable patterns of development and supports the transport objectives of the Plan.

[3] Chartered Institute of Highways and Transportation (2018). Buses in Urban Developments. Available at: https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf [PDF page 18] [Accessed 13 October 2026]

9.83 How would Policy T26 apply to brownfield regeneration sites where standards cannot immediately be met?

Council's response

9.83.1 Please see the Council's response to question 9.82.

9.84 How will compliance be measured and assessed?

Council's response

9.84.1 Please see the Council's response to question 9.82.

9.85 Is Policy T26 sufficiently flexible to respond to changing accessibility circumstances over the Plan period?

Council's response

9.85.1 Please see the Council's response to question 9.82.

Policy DM18: Transport Assessments, Transport Statements and Travel Plans

9.86 Are the policy thresholds requiring Transport Assessments, Transport Assessments and Travel Plans clearly set out and are they justified and effective?

Council's response

9.86.1 The Council has reviewed Policy DM18 in light of the Inspectors' questions.

9.86.2 The policy was included in the submitted Plan to support the use of Transport Assessments, Transport Statements and Travel Plans as mechanisms for assessing and mitigating the transport impacts of development, particularly in relation to the Strategic Road Network and growth planned on the Hoo Peninsula.

9.86.3 The Council acknowledges that the policy does not clearly define the thresholds at which Transport Assessments, Transport Statements or Travel Plans would be required and may therefore create uncertainty regarding its application.

9.86.4 The Council acknowledges that the requirement for Transport Assessments, Transport Statements and Travel Plans is already addressed through national policy, Planning Practice Guidance and established development management procedures.

9.86.5 The Council has not identified a specific local evidence base justifying the need for a standalone Plan policy setting out detailed requirements for Transport Assessment procedures and Travel Plans, along with their monitoring arrangements and enforcement mechanisms. In practice, Policy TR6 of the NPPF (2026) will apply.

9.86.6 Unlike Policy DM15, which addresses cumulative monitoring at the network level, Policy DM18 relates principally to site-level assessment mechanisms already established through national policy and guidance.

Proposed Main Modification

9.86.7 In light of these considerations, the Council considers that Policy DM18 is not necessary to make the Plan sound and proposes its deletion through a Main Modification.

Reason for proposed Main Modification

9.86.8 The Council considers that deletion of Policy DM18 would improve the clarity and effectiveness of the Plan.

9.86.9 The matters addressed by the policy are already substantially covered through national policy, Planning Practice Guidance and established development management procedures.

9.86.10 The Council has not identified proportionate evidence demonstrating that a separate Local Plan policy is required and therefore considers that Policy DM18 is not necessary to ensure that the Plan is justified, effective or consistent with national policy.

9.87 How do the requirements of Policy DM18 compare with national guidelines and Kent County Council guidance?

Council's response

9.87.1 Please see the Council's response to question 9.86.

9.88 What evidence demonstrates the effectiveness of Travel Plans in reducing reliance on private car travel?

Council's response

9.88.1 Please see the Council's response to question 9.86.

9.89 How will Travel Plans be monitored and enforced?

Council's response

9.89.1 Please see the Council's response to question 9.86.

9.90 What happens where Travel Plan targets are not achieved?

Council's response

9.90.1 Please see the Council's response to question 9.86.

9.91 Are monitoring requirements clear, proportionate and deliverable?

Council's response

9.91.1 Please see the Council's response to question 9.86.

9.92 Could the policy create unnecessary burdens on smaller developments?

Council's response

9.92.1 Please see the Council's response to question 9.86.

Policy DM19: Vehicle Parking

9.93 How were parking standards derived and is the evidence relied upon for them sufficiently up-to-date?

Council's response

9.93.1 Paragraph 9.12.1 of the Plan (ref: A1, PDF page 181) states that the Council's current vehicle parking standard was adopted in 2004 and revised in 2010. The residential vehicle parking standard provides for a minimum number of parking spaces per dwelling size. The relevant documents are attached to the Plan (ref: A1, Appendix B, PDF pages 415-431). The Council's current vehicle parking standard is 16 years old, but not necessarily outdated.

9.94 Have differing parking demands across urban, suburban and rural areas of Medway been considered?

Council's response

9.94.1 Paragraph 9.12.1 of the Plan (ref: A1, PDF page 181) quotes the 2010 addendum: "Reductions of the standard will be considered if the development is within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance." This is intended to provide flexibility in the application of the vehicle parking standard to achieve the most effective use of land and reduce travel demand.

9.95 Are the standards consistent with the wider transport strategy and objectives for modal shift?

Council's response

9.95.1 Chapter 8.4 of the STA's Mode Share Strategy (Stage 3) sets out potential options for car-free living serviced by car clubs and mobility hubs, however ideally the Council would have an up-to-date Vehicle Parking Standard. The Council is preparing a new Local Transport Plan which may consider parking management measures and demand management initiatives, in line with Policy TR2 of the NPPF (2026).

9.96 Is sufficient flexibility provided in highly accessible locations?

Council's response

9.96.1 Please see the Council's response to question 9.94.

9.97 How would departures from the parking standards be assessed?

Council's response

9.97.1 The Council considers that departures from the parking standards should be determined having regard to site-specific circumstances and supported by proportionate evidence. The Council would support modifications to the policy to clarify the matters that will be taken into account when assessing such departures, thereby improving the effectiveness of the policy and providing greater certainty for applicants and decision-makers.

9.98 Have the viability implications of parking provision requirements been assessed?

Council's response

9.98.1 The Viability Assessment (ref: B5, paragraphs 8.109 -8.110, PDF pages 140-141) confirms that the Policy DM19 does not, on the whole, add to the cost of development.

9.99 Are electric vehicle charging requirements justified and deliverable?

Council's response

9.99.1 Please see the Council's response to question 9.98.

Policy DM20: Cycle Parking and Storage

9.100 What evidence supports the cycle parking standards?

Council's response

9.100.1 Please see the Council's response to question 9.107.

9.101 Are these standards in Policy DM20 consistent with current best practice guidance?

Council's response

9.101.1 Please see the Council's response to question 9.107.

9.102 How were the cycle parking standards derived?

Council's response

9.102.1 Please see the Council's response to question 9.107.

9.103 What constitutes secure, convenient and accessible cycle storage for the purposes of Policy DM20?

Council's response

9.103.1 Please see the Council's response to question 9.107.

9.104 How will the quality of provision be secured through development management?

Council's response

9.104.1 Please see the Council's response to question 9.107.

9.105 Are the requirements achievable across all development types and in higher-density and mixed-use developments?

Council's response

9.105.1 Please see the Council's response to question 9.107.

9.106 Is there evidence that the standards are likely to promote and contribute to modal shift?

Council's response

9.106.1 Please see the Council's response to question 9.107.

9.107 Is Policy DM20 justified, effective and consistent with national policy?

Council's response

9.107.1 Policy DM20 was included in the Plan to support the Council's wider objectives of promoting active travel, reducing reliance on private car travel and creating sustainable patterns of movement. The policy seeks to ensure that development provides cycle parking and storage of a quality, quantity and design that encourages cycling as a realistic transport choice and supports the implementation of the transport hierarchy set out in national policy.

9.107.2 The Council considers that the policy is generally consistent with current best practice, including the principles contained within Local Transport Note 1/20 and Building for a Healthy Life. The standards seek to ensure that cycle parking is secure, convenient, accessible, weatherproof and integrated into the design of development, recognising that poor quality cycle storage can act as a barrier to cycling. The Council's intention is that compliance with the standards and design requirements would be assessed through the development management process, including review of site layouts, building design and supporting transport information submitted with planning applications.

9.107.3 The Council acknowledges that the supporting evidence could provide greater explanation regarding the derivation of the standards and the extent to which they are capable of promoting modal shift. The Council also recognises that the application of

the standards may require flexibility in certain circumstances, particularly on constrained brownfield sites, higher-density developments and mixed-use regeneration schemes.

Proposed Main Modification

9.107.4 The Council would support modifications to clarify the policy's operation, define the characteristics of secure and convenient cycle storage more explicitly, and confirm that departures from the standards may be considered where justified by site-specific circumstances.

Reason for proposed Main Modification

9.107.5 The Council considers that the objective of Policy DM20 remains justified and consistent with national policy. However, modifications to improve clarity regarding the evidence base, application of the standards and flexibility for site-specific circumstances would strengthen the effectiveness of the policy and provide greater certainty for applicants and decision-makers.

Overall Conclusion

The Council considers that the transport policies, site allocations and supporting transport evidence demonstrate that the Plan has been positively prepared, justified, effective and consistent with national policy. The Strategic Transport Assessment, Sustainable Transport Strategy, Infrastructure Delivery Plan and supporting evidence provide a proportionate and robust basis for concluding that the scale and distribution of development proposed by the Plan can be accommodated through a combination of sustainable transport measures, active travel infrastructure, public transport improvements and targeted highway mitigation.

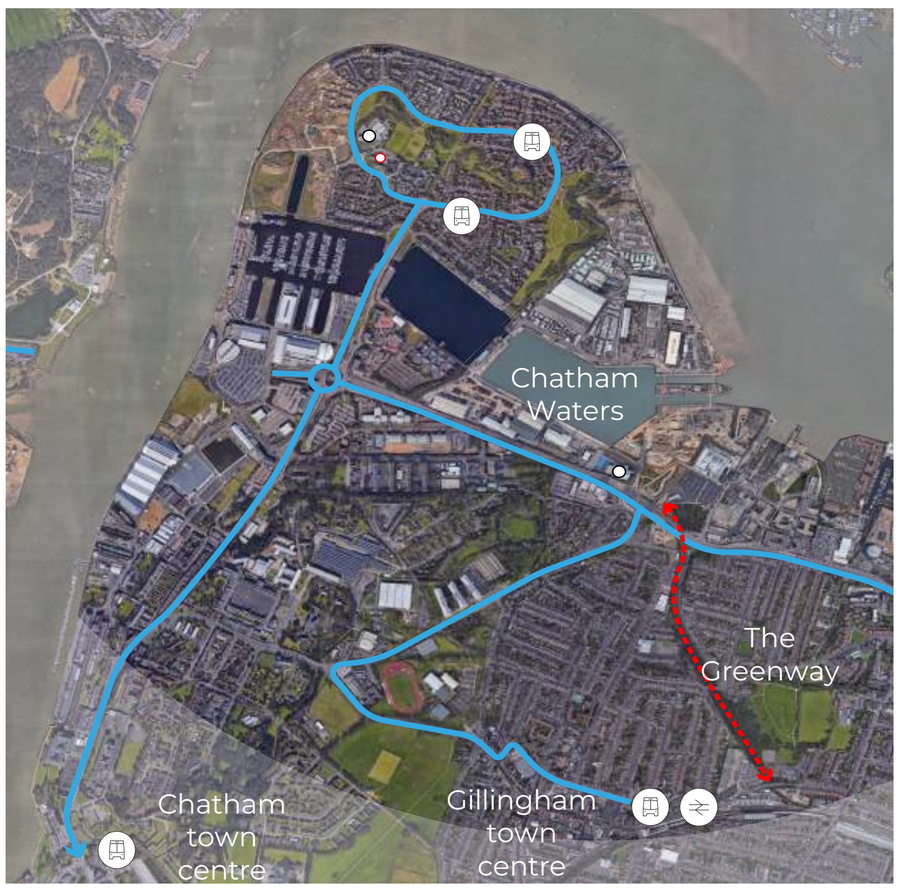
The Council acknowledges that a number of modifications would improve the clarity, effectiveness and consistency of the Plan, particularly in relation to policy wording, delivery mechanisms, infrastructure triggers, monitoring arrangements and the relationship between the Plan and supporting evidence. However, these modifications do not alter the overall development strategy or the fundamental conclusions of the transport evidence.

Subject to the proposed Main Modifications, the Council considers that the transport strategy provides a deliverable framework for supporting growth across Medway, that the necessary transport infrastructure requirements have been identified on a proportionate basis, and that appropriate mechanisms exist to monitor, review and respond to changing circumstances throughout the Plan period. Accordingly, the Council considers that the Plan is sound in transport terms.

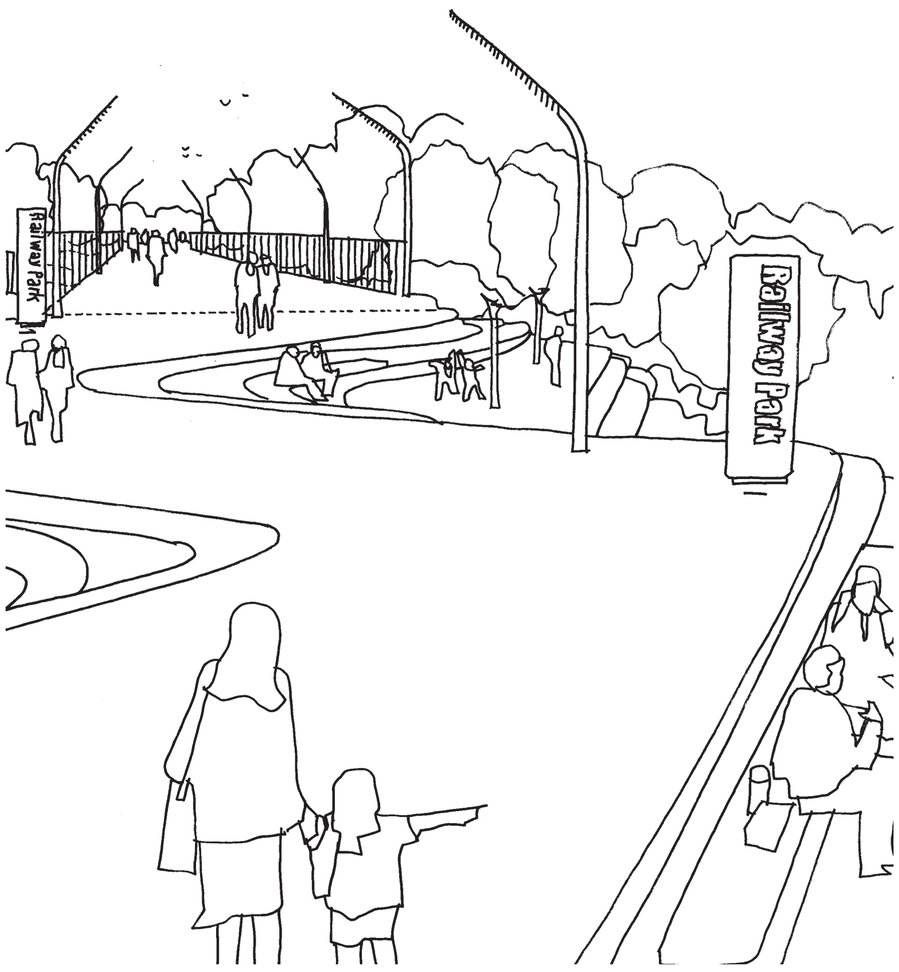
GILLINGHAM OPEN LINES - CONNECTING COMMUNITIES

The Greenway

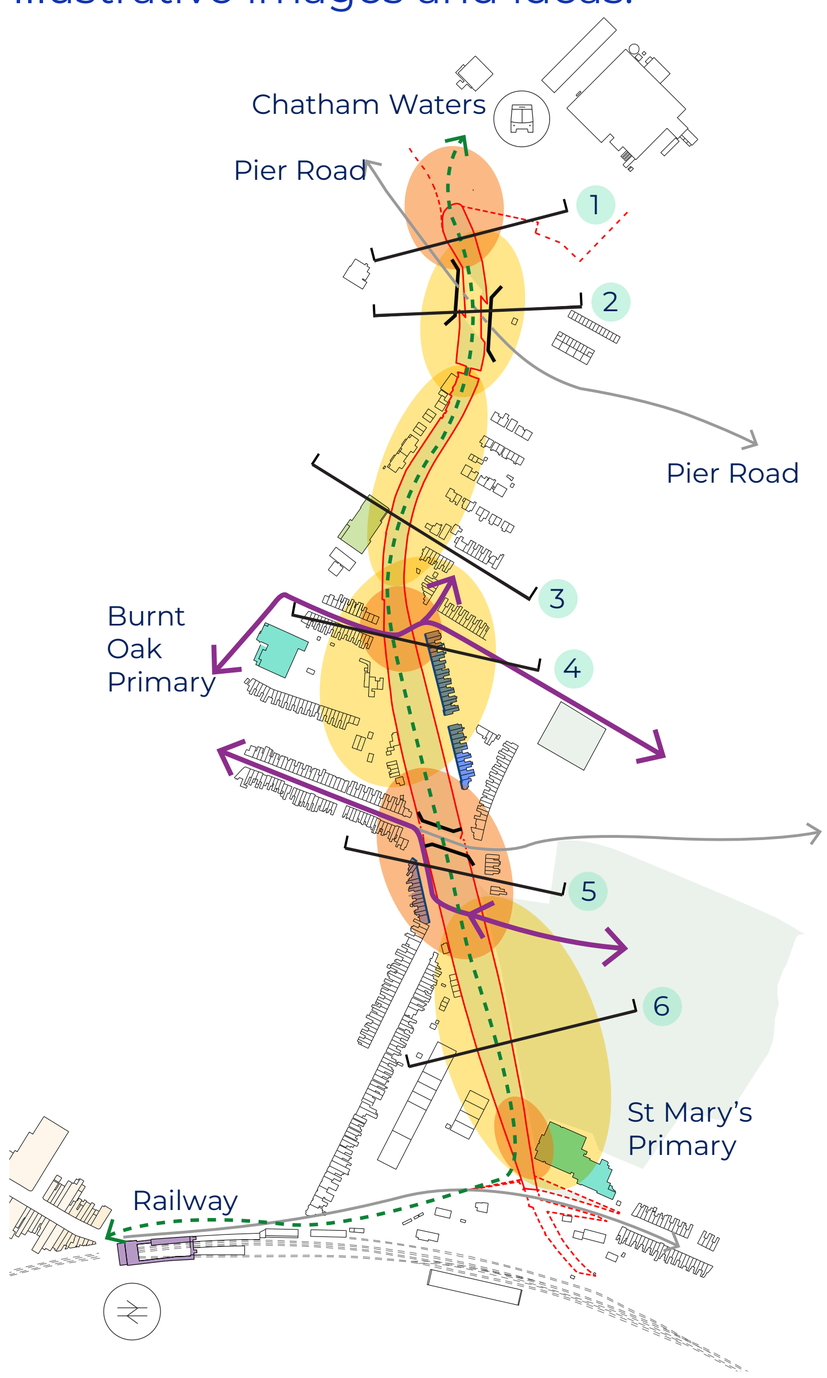
Our objective for the Greenway is to significantly improve the connectivity between Gillingham Station and Chatham Waters. We would do this by creating a cycling and walking corridor, opening up the current landscape in a user friendly manner and providing an additional attraction for existing residents, visitors and commuters. Our vision will transform the current ecological makeup of the site, preserving wherever practical the historical context of the railway. Beyond the site boundary, careful consideration has been given to the potential economic benefits to the wider area by breathing life into this forgotten space.

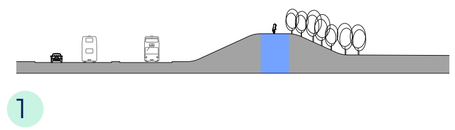


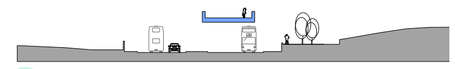
Site Location

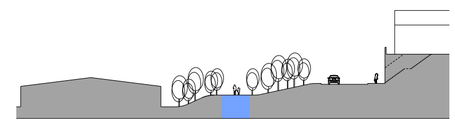


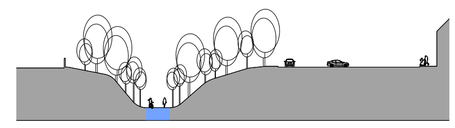
Illustrative images and ideas:

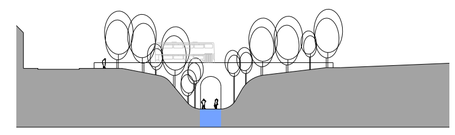


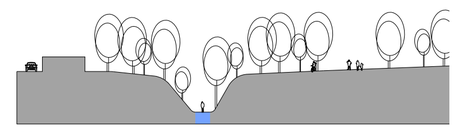

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The Greenway Site Existing Conditions

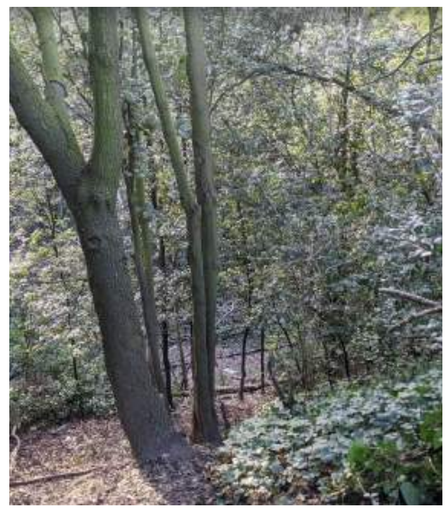

1 - Northern Gateway

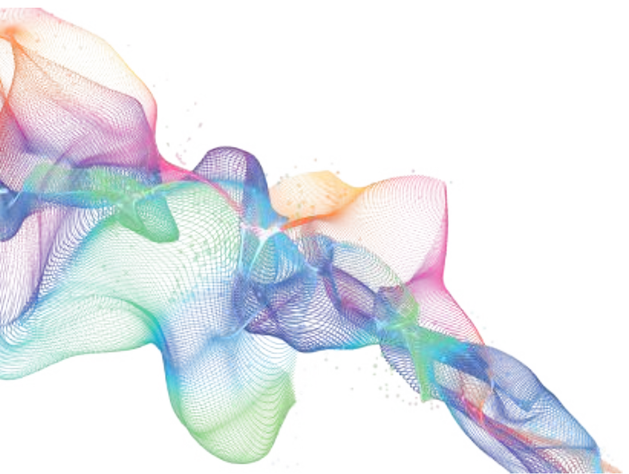

2 - The Bridge


3 - The Corridor


4 - Park Crossing


5 - Burnt Oak Terrace Junction


6 - Hillyfields Community Park



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urban movement
VISION | PLANNING | STRATEGY | DESIGN | RESEARCH

Peel L&P
REALISING POSSIBILITY

Jon Matthews Architects

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The Greenway

We have approached the design of the Greenway cycle and pedestrian route and park from a position of working with the existing landscape, rather than against it, to maintain the site as a natural green corridor. This approach values and works with the biodiversity and will be developed in line with the future recommendations of the environmental surveys.

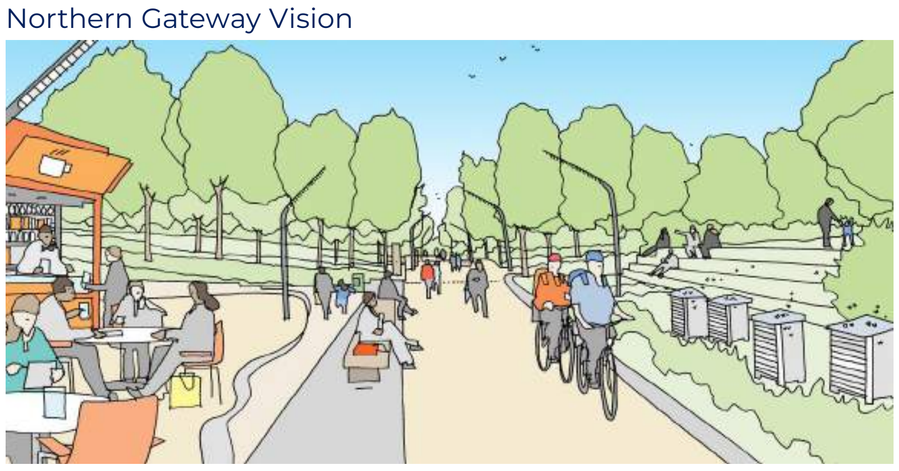
The aim is to retain as many of the existing trees on the site as practically possible, whilst also adding in new and varied planting that will improve biodiversity. The park that the cycle route creates is a resource for the community, a space to dwell, play, explore and learn to enhance their wellbeing. There are several schools overlooking the route, and with this in mind, the space is intended to become a valuable resource for education and sensory play. This approach will be developed through a series of workshops with the community, universities and schools to make sure it meets their needs and provides the spaces they want.

The design aims to improve links between the residential communities on either side of the historic railway cutting, creating new routes across the new park, linking communities.

Safety and accessibility is a key driver. The cycle route should be safe to use at all times of day with accessible ramps at key strategic locations. The route will be well lit, with regular access and exit points. Primary spaces are created at points along the route, with good passive supervision from houses overlooking the track. Natural surveillance will be further improved by raising the ground level up to match that of the street wherever possible.



Northern Gateway Vision



Park Crossing Vision

Illustrative images and ideas:



1 - Northern Gateway

Access from Pier Road / Asda

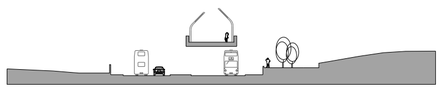


1



2 - The Bridge

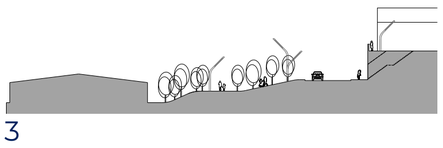
Preserving Heritage Assets



2



3 - The Corridor

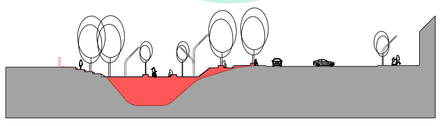


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4 - Parkway Crossing

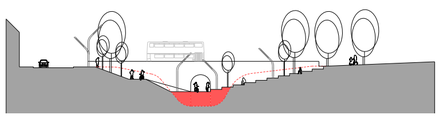
Connecting residential Communities



4



5 - Burnt Oak Terrace Junction

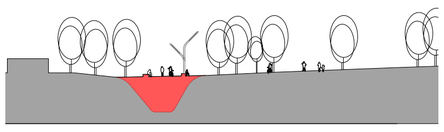


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6 - Hillyfields Community Park

Connection to Railway Street



6

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urban movement
VISION | PLANNING | STRATEGY | DESIGN | RESEARCH

Peel L&P
REALISING POSSIBILITY

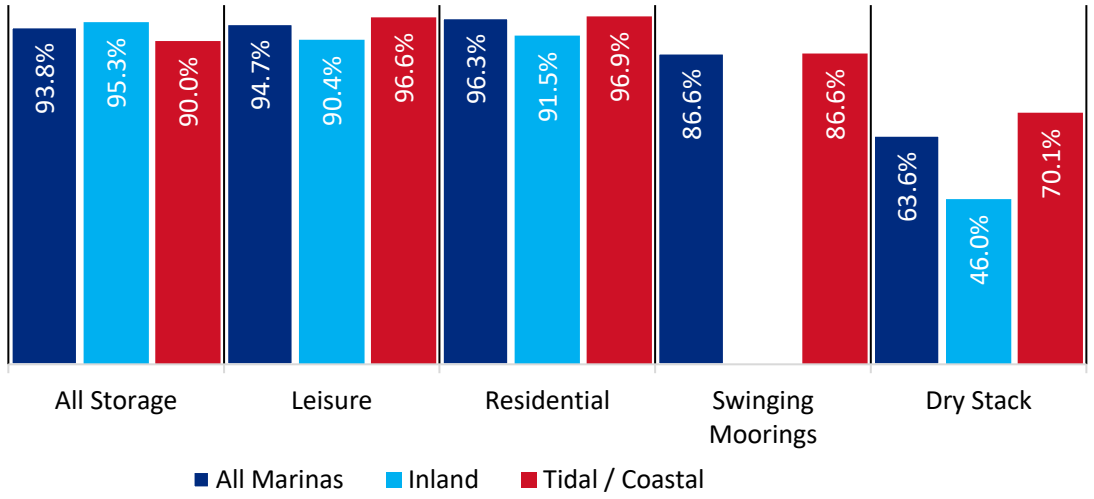
Jon Matthews Architects

Medway Council
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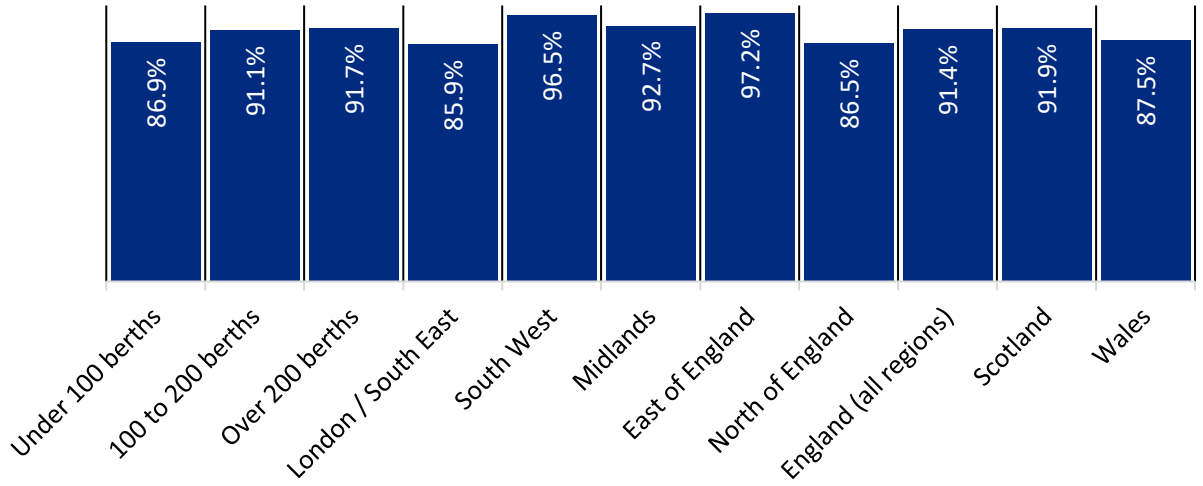
Marina & Moorings Market Occupancy Rates

Occupancy was high across most berth types, with residential (96.3%) and leisure (94.7%) leading, while **dry stack showed the lowest usage** at 63.6%. **Coastal marinas generally had higher occupancy than inland ones**, with higher rates across leisure (96.6% vs 90.4%), residential (96.9% vs 91.5%) and dry stack berths (70.1% vs 46.0%). Occupancy also varied by marina size and location, with **smaller marinas (under 100 berths) showing lower rates** (86.9%) compared to mid-sized (91.1%) and large marinas (91.7%). Regionally, **coastal marinas on the East (97.2%) and South West (96.5%) coasts had the highest occupancy**, while the South East (85.9%) and North lagged behind, with occupancy rates below 90%.

Average Occupancy by Berth / Mooring Type (%)*



Average Occupancy by Marina Size & Region (%)*

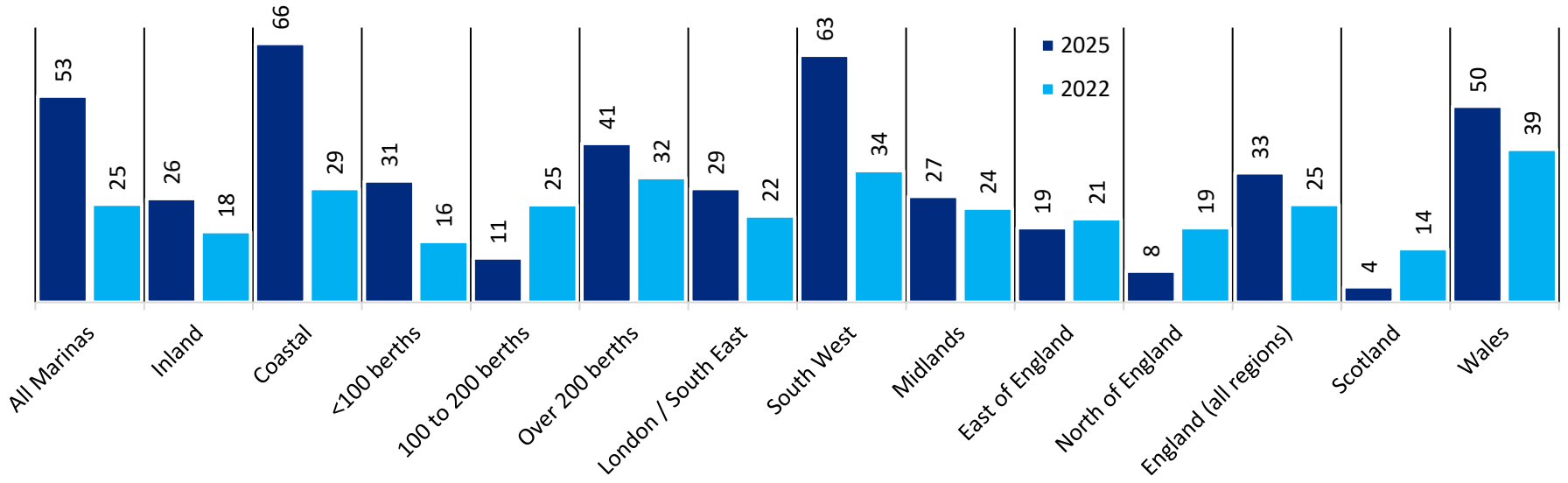


Please Note: *These occupancy rates measure occupancy as of 30 September 2025, to assess the state of the market at the end of the boating season. As a result, these figures cannot be compared with previous years, which were measured in April, at the beginning of the season, and have therefore been omitted from this report.*

Marina Waiting Lists

This slide reveals a **clear upward trend in average waiting list sizes** across TYHA marinas between 2022 and 2025, with increases evident across nearly all categories. **Coastal marinas show the highest average waiting lists** (66 in 2025 vs 29 in 2022), **reflecting sustained demand pressure**, especially in the South West, while inland marinas saw more moderately growth (26 vs 18). **Smaller marinas (<100 berths) experienced the sharpest rise** by marina size (31 vs 16), suggesting **limited capacity is being outpaced by demand**. Regionally, the **South West (63) has the longest average waiting list, indicating strong berth demand in popular cruising areas**. These patterns suggest a widening berth shortage in high-demand coastal regions, with demand spiking since 2022, while berth demand remains consistent on inland waterways.

Average (Mean) Waiting List Size by Marina Type, Size and Region



Please Note: *Having a waiting list does not necessarily mean that a marina is at full occupancy. Waiting lists can either apply to all berths in a marina or to specific size berths. For example, a marina can have 85% occupancy overall, but no vacancies for berths over 12m.*