

MC/23/0855

Date Received: 6 April 2023

Location: Land to the east of High Halstow, Kent

Proposal: Hybrid Planning Application for (i) Full Planning Application (Phase 1) for the erection of 270 no. residential units (including affordable housing) and the local centre (up to 1,000 sqm Use Classes E and F) with open space, associated vehicle, cycle and pedestrian access off Christmas Lane, upgrade of existing Public Right of Way, associated services and infrastructure, public realm, landscaping and SuDS. (with associated highway works and (ii) Outline Planning Application (all matters except for access, to be reserved for future determination) for the erection of up to 490no. residential units (including affordable housing), and a primary school (Use Class F1(a)) with new vehicular access points, car and cycle facilities and provision of public open space, sustainable drainage and landscaping works.

Applicant Agent Redrow Homes Ltd
Marrons

Mr Roland Brass
55 Baker Street
London
W1U 8AN

Ward: Peninsula Ward

Case Officer: Nick Roberts

Contact Number: 01634 331700

Recommendation of Officers to the Planning Committee, to be considered and determined by the Planning Committee at a meeting to be held on 11 March 2026.

Recommendation: Approval subject to:

- A. The applicant entering into a Section 106 agreement to secure the following:
- i) £174,504.80 to improve equipment and facilities at Medway Mobile Libraries and/or the local history library at Medway Archives Centre and/or libraries in the vicinity.
 - ii) £191,398.40 towards the provision of enhancements of community facilities within High Halstow to benefit the local community and residents of the development including but not limited to upgrades to the existing cricket pavilion, toilet block and village hall.
 - iii) £256,492.40 towards Designated Habitats Mitigation.

- iv) £81,806.40 to support youth development and youth provision within the local vicinity.
- v) £281,055.60 towards improved civic space and gateways to High Halstow (including but not limited to greening, bollards, seating, lighting, paving, wayfinding and signage).
- vi) £180,758.40 towards the improvement and promotion of waste and recycling services serving the development.
- vii) £254,318.80 towards enhancements to existing and new sports and leisure provision within High Halstow including but not limited to the purchase of additional land to improve existing sports provision within the village, upgrades to the existing cricket pavilion, toilets and village hall and upgrades to existing and new football pitches at High Halstow playing field and Deangate Sports Ground.
- viii) £57,000 towards improvements to signage/information and any relevant surface improvements, to the nearby public rights of way. Including new surfacing, seating, lighting, signage and associated legal costs where applicable.
- ix) £2,042,211.20 towards the creation of additional capacity in social care, primary care and community care required as a result of the increase in housing and resulting patient registration.
 - Social Care - £218,211.20
 - Health Primary Care - £1,520,000
 - Health Community Care - £304,000
- x) £11,465,701.11 towards delivering a Two Form Entry Primary School, including land transfer and measures to ensure vehicular and pedestrian access up to the site boundary with the school along with the necessary services.
- xi) £6,787,120.00 towards strategic highway mitigation including but not limited to improvements to Four Elms, Sans Pareil, Main Road, Ropers Lane roundabouts and a wider sustainable transport package.
- xii) £859,560.00 towards improvements to improving existing open space provision and equipment within High Halstow including but limited to the existing MUGA, Skate Park, football pitches, cricket pavilion, village hall and or towards the purchase of additional land to improve existing sports provision within the village.
- xiii) £1,278,099.60 towards a Strategic Environmental Mitigation Strategy (SEMS) to would include the Northward Hill SSSI Mitigation and other identified sites.
- xiv) 25% of all housing to be provided as affordable housing.

- xv) No development shall take place until a full implementation and phasing plan for the off-site highway works proposed on drawings 271568-00-047-05 Rev A, 271568-00-047-05 Rev A, 271568-00-047-06 Rev A, 271568-00-047-07 Rev A , 271568-00-047-08 Rev A , 271568-00-047-09 Rev A 271568-00-047-09 Rev A, 271568-00-047-10 Rev A, 271568-00-047-10 Rev A and 271568-00-047-12 Rev A have been submitted to and approved in writing by the Local Planning Authority, in consultation with the Local Highway Authority. The approved plan shall include drawings, delivery sequencing linked to phased occupations, and a timetable for completion. The works shall thereafter be delivered in accordance with the approved details and phasing plan.
- xvi) No development above ground floor slab level within Phase 1 shall commence until a PRoW RS44 Implementation Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include:
- (a) final alignment and detail design (surfacing, lighting, drainage, accessibility features);
 - (b) consents and agreements (including any third-party land arrangements);
 - (c) delivery timetable aligned to early occupations; and
 - (d) arrangements for inspection and maintenance responsibilities.

Financial contributions equate to £23,910,026.71 (£31,461.00 per dwelling) plus the non-financial elements including 25% affordable homes and on-site facilities such as open space and the MUGA within the school.

B. The following conditions:

Conditions for Outline Consent

- 1 In respect of that part of the application where outline consent is granted, the approval of details of the appearance, landscaping, layout and scale (hereinafter called 'the Reserved Matters') shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of each construction phase.

Reason: To accord with the terms of the submitted application and in to ensure that these details are acceptable.

- 2 Application for the approval of the Reserved Matters referred to in Condition 1 for the first construction phase of the outline consent shall be submitted in writing to the Local Planning Authority for approval. Such application for approval shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission and all applications for approval of Reserved Matters for the remaining phases shall be made before the expiration of five years from the date of this permission. The development shall thereafter be carried out in accordance with the approved details.

The commencement of each construction phase pursuant to this outline consent shall be begun before the expiration of two years from the date of the last Reserved Matter in respect of that construction phase to be approved, and thereafter the development shall be carried out in accordance with the approved details.

Reason: To comply with Section 92(2) of the Town and Country Planning Act 1990.

- 3 The development hereby permitted relating to the outline planning permission shall be carried out broadly in accordance with the following approved plans:

Received 9 May 2025

24.138 0001.000 P Rev 1 - Site Location Plan
24.138 0150.000 P Rev 1 - Land Use Parameter Plan
24.138 0151.000 P Rev 2 - Parcel Density Parameter Plan
24.138 0152.000 P Rev 1 - Access & Route Network Parameter Plan
24.138 0153.000 P Rev 1 - Building Heights Parameter Plan
24.138 0162.000 P Rev 1 - Character Areas Parameter Plan

Reason: For the avoidance of doubt and in the interests of proper planning.

- 4 Prior to the submission of the first application for Reserved Matters, a Detailed Phasing and Implementation Plan shall be submitted to and approved in writing by the Local Planning Authority. The phasing plan shall demonstrate how the development of the entire site can be brought forward to secure development in a timely manner in accordance with following details and quantum's:

- A maximum of 490 residential units;
- Proposed construction phase details;
- The order and timing of the proposed construction phases;
- Land reserved for Two Form Entry Primary school with MUGA;
- Development parcels and public realm;
- 1 x NEAP and 2 x LAPS;
- Open space and green infrastructure including identified areas for informal play (play on the way) and allotments;
- Woodland improvements and habitat creation;
- Drainage infrastructure;
- Road layout and access arrangements, pedestrian, cycle networks and footpath and PROW Improvements.

The development shall be implemented in accordance with the most recently approved Phasing Plan.

Reason: To ensure that the key elements of each phase of the development is completed in an order which ensures that infrastructure needs, landscaping/open space and access are in place relevant to each phase

before further development is undertaken, in the interests of good design and proper planning.

- 5 The Detailed Phasing Plan approved pursuant to condition 4 may be amended from time to time to reflect changes to the phasing of the development that were not foreseen at the time the Detailed Phasing and Implementation Plan was approved, subject to obtaining the prior written approval of the Local Planning Authority as long as it has been demonstrated that such changes are unlikely to have significant adverse environmental effects compared to the assessments contained in the ES and that they would not significantly undermine the delivery of the development.

Reason: To allow revisions to the approved Detailed Phasing and Implementation Plan and to enable development to be delivered in the interests of proper planning in accordance with the assumptions underpinning the ES.

- 6 Each Reserved Matters Application shall be accompanied as appropriate, by the following documents and/or information:

- i) A Design and Access Statement that demonstrates how the proposals accord with the approved parameter plans and in the case of any variation explain the nature of that change and such variation shall be agreed in writing by the Local Planning Authority.
- ii) And in relation to the matter of layout a Reserved Matters application shall include:
- Details of the site layout access to the development parcel and within the development parcel or construction phase for vehicles, cycles and pedestrians;
 - Details of the siting and orientation of the proposed buildings and any relevant roads and footpaths, as well as the location of any landscaped or open space areas;
 - Details of any necessary temporary layout associated with boundary treatment and condition between the Development Parcels;
 - Details of parking areas, garages, servicing areas and plant areas;
 - Details of cycle parking;
 - Details of proposed external lighting;
 - Details of pedestrian and cycle routes within the development site;
 - Details and specification of proposed earth modelling, mounding, re-grading or changes of level to be carried out including spot levels;
 - Refuse storage details and collection points;

- Details of Electric Vehicle Charging Points (EVCP) at a ratio of one EVCP per private driveway and one EVCP per 10% of parking spaces within communal areas.
- iii) and in relation to scale and design a Reserved Matters application shall include:
- Details of building heights and massing including the provision of bungalows;
 - Details of housing mix including the mix and location of affordable housing;
 - Details of the internal layouts of buildings;
 - Details of the external treatment and design of the buildings.
- vi) and in relation to the matter of landscaping a Reserved Matters application shall include:
- Plans, drawings and specifications showing full details of both hard and soft landscape treatment and works, including materials (size, type and colour), existing and proposed finished ground levels; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas including roads and PRow improvements; all paving and external hard surfacing; decking; minor artefacts and structures (play equipment, street furniture, lighting columns/brackets, drainage arrangement, underground utilities, refuse receptacles, planters, tree grilles, any other decorative feature(s));
 - Tree planting details and specifications, schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate (including cultivation and other operations associated with grass and plant establishment, aftercare and maintenance);
 - Details of the programme for implementing and completing the planting

Reason: In order that the Reserved Matters Applications can be properly considered and assessed and in the interests of proper planning.

Site Wide Conditions

- 7 No development within a construction phase shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall include amongst other matters details of: hours of construction working; measures to control noise affecting nearby residents; wheel cleaning/chassis cleaning facilities; dust control measures; pollution incident control, lighting and site contact details in case of complaints; details of temporary site screening, details of the routing and parking of construction vehicles, loading/unloading and turning facilities, hours of access, access and egress arrangements, details for the storage of

materials and mixing of cement, construction workers travel plan. The construction works shall thereafter be carried out at all times in accordance with the approved Construction Environmental Management Plan.

Reason: Required before commencement of development in order to minimise the impact of the construction period on the amenities of local residents, the countryside, wildlife and habitat and with regard to Policies BNE2, BNE37 and BNE39 of the Medway Local Plan 2003.

- 8 No development within a construction phase shall take place until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the Local Planning Authority. The construction works shall thereafter be carried out at all times in accordance with the approved Construction Traffic Management Plan.

Reason: To ensure the efficient operation of the A2(T) and M2 Trunk Roads in accordance with paragraph 115 of the National Planning Policy Framework 2024.

- 9 No development within a construction phase shall take place until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority (LLFA). The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

The approved CSWMP and shall include method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:

- i. Temporary drainage systems;
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses;
- iii. Measures for managing any on or offsite flood risk.

The development shall be undertaken in accordance with the approved details.

Reason: Required prior to commencement to manage surface water during construction and for the lifetime of the development as outlined at Paragraph 181 of National Planning Policy Framework 2024.

- 10 No development within a construction phase shall take place (save for advance infrastructure enabling works) until details of the proposed means of foul sewerage disposal have been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 187 of the National Planning Policy Framework 2024.

- 11 No development within a construction phase shall take place until a scheme based on sustainable drainage principles, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

The scheme shall include (where applicable):

- i. Details of the design of the scheme (in conjunction with the landscaping plan where applicable);
- ii. A timetable for its implementation (including phased implementation);
- iii. Operational maintenance and management plan including access requirements for each sustainable drainage component;
- iv. Proposed arrangements for future adoption by any public body, statutory undertaker or management company.

The development shall be undertaken in accordance with the agreed scheme.

Reason: Required before commencement of the development to manage surface water post construction and for the lifetime of the development as outlined at Paragraph 181 of National Planning Policy Framework 2024.

- 12 No further infiltration of surface water drainage in the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 181 of the National Planning Policy Framework 2024.

- 13 No development, including any site clearance and below ground works, within any construction phase shall take place until a Skylark Mitigation and Compensation Strategy has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall ensure off-site habitat is provided for the projected loss of at least 14 skylark territories and for the projected loss of wintering habitat for at least 81 skylarks (as identified in the Aspect Ecology, Baseline Ecological Appraisal for Land to the East of High Halstow, dated 25th April 2025 (5403 BaseEcoApp vf3/SK/JW/MRD). The Strategy shall ensure the mitigation and compensation measures with regards to habitat improvements proposed, and the area of land required, are based on available scientific research (such as The SAFFIE Project Report by Clarke et al., June 2007; BTO Research Report No. 129 by Wilson and Browne, October 1993; and Journal für Ornithologie article on Territory density of the

Skylark (*Alauda arvensis*) in relation to field vegetation in central Germany by Toepfer and Stubbe, December 2001; Natural England's guidance on Sustainable Farming Incentive (SFI) action AHW4: Skylark plots, 15 August 2024). If the proposed compensation site already has existing skylark territories and/or is already proposed as skylark compensation for other development, evidence shall be provided to demonstrate that the measures proposed are additional to any existing territories. The Strategy shall include the following:

- i. Up-to-date breeding bird survey data for the proposed compensation site (and where advised by a suitably qualified ecologist, for the on-site habitat);
- ii. Purpose and conservation objectives for the proposed works;
- iii. Review of site potential and constraints;
- iv. Detailed design(s) and/or working method(s) to achieve stated objectives;
- v. Extent and location/area of proposed works on appropriate scale maps and plans;
- vi. Type and source of materials to be used where appropriate, e.g. native species of local provenance;
- vii. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- ix. Details of the body or organisation(s) responsible for implementing the Strategy;
- x. Details of initial aftercare and long-term maintenance, and;
- xi. Details for monitoring (to be undertaken by a suitably qualified ecologist(s)) and remedial measures.

The Skylark Mitigation and Compensation Strategy shall be implemented in accordance with the approved details no later than the commencement of construction or site clearance, if earlier. All features shall be retained as approved thereafter, unless remedial measures are required.

Reason: To ensure the protection of wildlife and supporting habitat and enhance the character of the area in accordance with policies BNE37 and BNE39 of the Medway Local Plan 2003.

- 14 No development within a construction phase shall take (including any ground works, site or vegetation clearance) shall take place until a construction ecological management plan (CEMP - Biodiversity) for that phase has been submitted to and approved in writing by the Local Planning Authority. The CEMP - Biodiversity shall be based on the Baseline Ecological Appraisal dated 25th April 2025 (Ref: 5403 BaseEcoApp vf3/SK/JW/MRD), and Chapter 7 of the Environmental Statement as updated May 2025, Aspect Ecology drawing 5403/7.5b - Mitigation Proposals Rev A/JP, and up-to-date ecological survey information, as advised by a suitably qualified ecologist. The CEMP - Biodiversity shall include the following:

- Purpose and objectives for the proposed works:

- The identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;
- Detailed design(s) and/or working method(s) necessary to achieve stated objectives;
- Extent and location of proposed works (including receptor areas(s)) shown on appropriate scale maps and plans for all relevant species and habitats;
- Reference to the relevant protected species licences (e.g., badgers and dormice) to be obtained in advance of site clearance/construction and any relevant mitigation measures required;
- Reference to the measures required for protected and priority habitat and species mitigation and compensation;
- Reference to any Environment Agency permits required and any relevant mitigation measures required;
- Reference to or inclusion of a detailed arboricultural method statement to protect retained trees;
- Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- Persons responsible for implementing the works, including times during construction when specialist ecologists need to be present on site to undertake / oversee works;
- Disposal of any wastes for implementing work.

The works shall be carried out in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To protect habitats and species identified in the ecological surveys from adverse impacts during construction in accordance with Policy BNE37 and BNE39 of the Medway Local Plan 2003.

- 15 No development within a construction phase shall take (including any ground works, site or vegetation clearance) until a detailed Ecological Design Strategy (EDS) for that phase has been submitted to, and approved in writing by, the Local Planning Authority. The detailed EDS for that phase shall be clearly and explicitly informed by the Aspect Ecology Baseline Ecological Appraisal for Land to the East of High Halstow dated 25th April 2025 (Ref: 5403 BaseEcoApp vf3/SK/JW/MRD), Chapter 7 of the Environmental Statement as updated May 2025, Aspect Ecology drawing 5403/7.4 Rev A/BG - Mitigation Proposals dated March 2023, Aspect Ecology drawing 5403/7.5b Rev A/JP - Ecology Mitigation and Creation Plan dated January 2026, Aspect Ecology Biodiversity Net Gain Assessment (Updated) (Ref: 5403 BNG Update vf2 JW/MRD) dated 1st May 2025, and up-to-date ecological survey information, as advised by a suitably qualified ecologist. The EDS for each phase shall include the following:

- Purpose and conservation objectives for the proposed design;
- Review of site potential and ecological constraints;
- Updated biodiversity net gain calculations based on detailed designs for the current and previous phases, and where necessary outline

designs (for subsequent phases), to objectively demonstrate that the development is on track to deliver a quantitative biodiversity net gain using the latest statutory biodiversity metric calculation tool;

- Detailed designs shown on scaled plans to achieve stated objectives, including:
- Lighting contour plans to show expected lux levels on the horizontal plane (and vertical plane where necessary), so that it can be clearly demonstrated that areas to be lit shall not disturb the activity of relevant ecological receptors;
- Soft landscaping plans and planting schedules;
- Habitat features shown on building elevation plans, soft landscaping plans, fencing plans etc. as appropriate;
- How and where external lighting shall be installed;
- The provision of technical specifications for the external lighting;
- Details of the precise location (including erection height from ground level and aspect), dimensions, construction materials (including make and model where relevant) and construction methodology of habitat features;
- Bat and bird boxes made of durable materials and targeted at species of conservation concern that could make use of the site;
- Timetable for implementation demonstrating that works are aligned with the proposed phasing of development and the site-wide EDS;
- Persons responsible for implementing the design;
- Details of initial aftercare and long-term management for the lifetime of the development to be provided in a Landscape and Ecological Management Plan (LEMP). The LEMP shall include:
 - Aims and objectives of management;
 - Prescriptions for management actions;
 - Preparation of a work schedule (including an annual work plan capable of being rolled forward over a ten-year period);
 - Details for monitoring and remedial measures; and
 - Details of the individual, body or organisation(s) responsible for implementation of the plan.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained thereafter.

Reason: To ensure that the landscaping, habitat creation and ecological enhancement measures approved as part of the development are implemented, managed and maintained in accordance with Policy BNE37 and BNE39 of the Medway Local Plan 2003.

16 No dwelling within a construction phase shall be occupied until;

- a) the habitat retention, creation and enhancement works set out in the approved ecological design strategy for that phase pursuant to condition 15 have been completed; and

- b) a completion report, evidencing that the completed habitat enhancements for that phase, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: To ensure that the habitat creation and ecological enhancement measures approved as part of the development are implemented in accordance with Policy BNE37 and BNE39 of the Medway Local Plan 2003.

- 17 No development within a construction phase shall take (including any ground works, site or vegetation clearance) until additional information regarding the proposed receptor sites for reptiles has been submitted to and approved in writing by the Local Planning Authority. The reptile receptor sites shall provide habitat of sufficient quantity and quality to compensate for that lost as a result of the development, shall be free from public access, and shall be appropriately located to ensure their suitability for long term reptile translocation and management. The additional information shall include a timetable for implementation. The development shall thereafter be implemented in accordance with the approved details.

Reason: Required prior to commencement of development to ensure that the wildlife features present in this location are not lost as a direct result of the proposals, compliant with Policy BNE37 and BNE39 of the Medway Local Plan 2003.

- 18 No development within a construction phase shall take (including any ground works, site or vegetation clearance) until one of the following has been submitted to and approved in writing by the Local Planning Authority, demonstrating that impacts on great crested newts arising from the development have been appropriately addressed and compensated:
- a) A copy of the relevant Protected Species Licence or District Level Licence for great crested newts issued by Natural England; or
 - b) Written confirmation from Natural England stating that such a licence is not required for the specified development.

Reason: Required prior to commencement of development to ensure that the wildlife features present in this location are not lost as a direct result of the proposals, compliant with Policy BNE37 and BNE39 of the Medway Local Plan 2003.

- 19 Application(s) for Reserved Matters shall include a detailed design, implementation, and ongoing management and monitoring plan for the landscape buffer to Fisher's Wood Ancient Woodland. The plan shall set out how the buffer will be established, managed, and maintained to prevent informal access, including measures for the closure and restoration of any informal footpaths that may arise within this area. The plan shall also include details of proposed interpretation boards to be installed within the adjacent areas of public open space, advising users of the sensitivities of the Ancient Woodland and the importance of protecting this irreplaceable habitat. The

development shall thereafter be implemented and maintained in accordance with the approved details.

Reason: To prevent informal access and recreational disturbance to the SSSI in accordance with Policy BNE35 of the Medway Local Plan 2003.

- 20 Notwithstanding the details shown on submitted plan 5403/7.5b Rev A/JP - Ecology Mitigation and Creation Plan, as part of the Reserved Matters submission(s) a minimum buffer of at least 20 metres shall be maintained between any part of the development and the boundary of Fishers Wood Ancient Woodland.

Reason to ensure the protection and long-term ecological integrity of Fishers Wood Ancient Woodland, in accordance with paragraph 193 of the National Planning Policy Framework 2024.

- 21 No development within a construction phase shall take place until the applicant, or their agents or successors in title, has secured the implementation of:
- i. Archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and
 - ii. Following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

- 22 Within 12 months of the completion of the on-site archaeological works detailed in condition 11, an Archaeological Post-Excavation Assessment Report shall be submitted to the Local Planning Authority for approval. The Post-Excavation Assessment Report shall include an Updated Project Design and accompanying timetable for any further analysis and publication of the findings of the archaeological investigations, and for the deposition of the resulting archaeological archive. The analysis, archaeological publication and the deposition of the archive shall be funded by the developer and carried out in accordance with the programme and timetable set out in the Updated Project Design.

Reason: To ensure the results of the archaeological investigations are made publicly accessible in accordance with the objectives of paragraph 207 of the NPPF.

- 23 No development within a construction phase shall take place, until an arboricultural method statement to ensure the satisfactory protection of retained trees, hedgerows and vegetation has been submitted to and approved in writing by the Local Planning Authority. The matters to be included within the arboricultural method statement shall include the following:
- i. A specification for the pruning of, or tree surgery to, trees to be retained in order to prevent accidental damage by construction activities;
 - ii. The specification of the location, materials and means of construction of temporary protective fencing and/or ground protection in the vicinity of trees to be retained, in accordance with the recommendations of BS 5837 'Trees in relation to design, demolition and construction' and details of the timing and duration of its erection;
 - iii. The definition of areas for the storage or stockpiling of materials, temporary on-site parking, site offices and huts, mixing of cement or concrete, and fuel storage;
 - iv. The specification of the routing and means of installation of drainage or any underground services in the vicinity of retained trees;
 - v. The details and method of construction of any other structures such as boundary walls in the vicinity of retained trees and how these relate to existing ground levels;
 - vi. The details of the materials and method of construction of any roadway, parking, pathway or other surfacing within the RPA, which is to be of a 'no dig' construction method in accordance with the principles of Arboricultural Practice Note 12 "Through the Trees to Development", and in accordance with current industry best practice; and as appropriate for the type of roadway required in relation to its usage.
 - vii. Provision for the supervision of ANY works within the root protection areas of trees to be retained, and for the monitoring of continuing compliance with the protective measures specified, by an appropriately qualified arboricultural consultant, to be appointed at the developer's expense and notified to the Local Planning Authority, prior to the commencement of development; and provision for the regular reporting of continued compliance or any departure there from to the Local Planning Authority.

Thereafter the development shall be carried out in accordance with the approved details with the approved measures being kept in place during the entire course of construction activity.

Reason: To ensure that reasonable measures are being taken to protect trees and hedgerows during construction in line with Policy BNE41 and BNE43 of the Medway Local Plan 2003.

- 24 No development within a construction phase shall take place until an Air Quality Management Plan and Emissions Mitigation Statement has been submitted to and approved in writing by the Local Planning Authority. The Statement shall be prepared in accordance with the Medway Air Quality Planning Guidance and include the mitigation measures contained within

Chapter 4 of the Environmental Statement. The total monetary value of the mitigation to be provided shall be demonstrated to be equivalent to, or greater than, the total damage cost values calculated as part of the approved Air Quality Assessment. The development shall be implemented, and thereafter maintained, entirely in accordance with the measures set out in the approved Mitigation Statement.

Reason: To ensure the development does not prejudice conditions of amenity by way of poor air quality in accordance with Policies BNE2 and BNE24 of the Medway Local Plan 2003.

- 25 Prior to the commencement of any groundworks, including excavation or piling within a construction phase an Unexploded Ordnance (UXO) Risk Management Plan shall be prepared in accordance with the recommendations and methodology set out in Chapter 20 of the UXO Risk Assessment (Ref: DA10201-00) produced by 1st Line Defence. The Plan shall include:

- Procedures for dealing with UXO if encountered, including emergency protocols;
- Contractor training and briefings on the identification of UXO and response measures;
- Monitoring arrangements during excavation and piling works, with specialist support available if required.

The UXO Risk Management Plan shall be kept on site during the construction phases and made available to view at the written request of the Local Planning Authority.

Reason: To ensure appropriate measures are in place to manage the potential risk of unexploded ordnance during construction, thereby safeguarding public safety and the integrity of the development.

- 26 No development within a construction phase shall take place until an acoustic assessment has been undertaken to determine the impact of noise arising from Coach Barn Kennels, Christmas Lane, High Halstow. The methodology employed in undertaking this assessment shall be discussed in advance within the Council's Environmental Protection Officer. The results of the assessment and details of any mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is brought in to use and thereafter be maintained in accordance with the approved details.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 27 No development within a construction phase shall take place above ground floor slab level until a scheme of acoustic protection against road traffic noise has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of acoustic protection sufficient to

ensure internal noise levels (LAeq,T) no greater than 30dB in bedrooms and 35dB in living rooms with windows closed and a maximum noise level (LAm_{ax}) of no more than 45dB(A) with windows closed. Where the internal noise levels will be exceeded with windows open, the scheme shall incorporate appropriate acoustically screened mechanical ventilation. The scheme shall include details of acoustic protection sufficient to ensure amenity/garden noise levels of not more than 55dB (LAeq,T). All works, which form part of the approved scheme, shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.

Reason: To protect residential amenity from road traffic noise and surrounding activities in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 28 Applications for Reserved Matters relating to the new school shall include an acoustic assessment to determine the impact of noise arising from the Multi Use Games Area serving the school. The results of the assessment and details of any mitigation measures required to protect noise sensitive receptors shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is brought into use and thereafter be maintained in accordance with the approved details.

Reason: To protect residential amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 29 Prior to the occupation of the primary school an acoustic assessment shall be undertaken to determine the impact of noise arising from the mechanical plant. The noise rating level (L_{Ar,Tr}) of this plant shall be at least 10dB below the background noise level (LA_{90,T}) at the nearest residential facade. All measurements shall be defined and derived in accordance with BS4142: 2014. The results of the assessment and details of any mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is brought in to use and thereafter be maintained in accordance with the approved details.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 30 Prior to the occupation of the ground floor commercial units proposed within apartment blocks A and B an acoustic assessment shall be undertaken to determine the impact of noise arising from the mechanical plant. The noise rating level (L_{Ar,Tr}) of this plant shall be at least 10dB below the background noise level (LA_{90,T}) at the nearest residential facade. All measurements shall be defined and derived in accordance with BS4142: 2014. The results of the assessment and details of any mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The approved measures

shall be implemented before the development is brought into use and thereafter be maintained in accordance with the approved details.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 31 Prior to the occupation of the ground floor commercial units proposed within apartment blocks A and B an acoustic assessment shall be undertaken to determine the impact of noise arising from the use of the premises. The results of the assessment and details of any mitigation measures required to protect noise sensitive receptors shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is brought into use and thereafter be maintained in accordance with the approved details.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 32 Where applicable and prior to the first occupation of the ground floor commercial units proposed within apartment blocks A and B, a scheme for the extraction and treatment of cooking fumes, including details for the control of noise and vibration from the system, shall be submitted and approved in writing by the Local Planning Authority. Noise from the extraction system (LAeq,T) shall be at least 10dB(A) below the background noise level (LA90,T) at the nearest residential facade, when assessed in accordance with BS4142:2014. The approved scheme shall be implemented before the development is brought into use and thereafter be maintained in accordance with the approved details.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 33 The separating partition(s) between the bedrooms and living/dining/kitchen areas of residential units in separate occupation within any construction phase shall resist the transmission of airborne sound such that the weighted standardised level difference (DnT,W +Ctr) shall not be less than 50 decibels as measured and calculated in accordance with BS EN ISO 16283-1 2014.

Reason: Required prior to commencement of development to ensure the development does not prejudice occupier amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 34 If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted a method statement and obtained written approval from the Local Planning Authority. The Method Statement must detail how this

unsuspected contamination shall be dealt with. The development shall thereafter be implemented in accordance with the approved details.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 35 No development within a construction phase shall take place until details of the proposed external lighting scheme including a plan showing the lighting design, underground cabling and location of the lighting has been submitted to and approved in writing by the Local Planning Authority. The plan shall include details of the height, position, external appearance, any shielding, light intensity, colour, spillage (such as light contour or lux level plans showing the existing and proposed levels), demonstrating that areas to be lit will not disturb bats and other nocturnal animals. All external lighting will be installed in accordance with the approved details and shall be maintained thereafter.

Reason: To ensure protection of residential amenities and ecological interests of the site in accordance with Policy BNE2 and BNE37 of the Medway Local Plan 2003.

- 36 No dwelling within a construction phase shall be occupied (or within an agreed implementation schedule) until a signed verification report carried out by a qualified drainage engineer (or equivalent) must be submitted to and approved by the Local Planning Authority to confirm that the agreed surface water system has been constructed as per the agreed scheme and plans. The report shall include details and locations of critical drainage infrastructure (such as inlets, outlets and control structures) including as built drawings, and an operation and maintenance manual for the unadopted parts of the scheme as constructed.

Reason: This condition is sought in accordance with paragraph 181 of the National Planning Policy Framework 2024 to ensure that suitable surface water drainage scheme is designed and fully implemented so as to not increase flood risk on site or elsewhere.

- 37 Applications for Reserved Matters relating to the new school shall include the submission of a Community Use Agreement (CUA). The CUA shall describe all the facilities included in the agreement and shall include details of hours of use, pricing policy, access by non-educational establishment users, management responsibilities and a mechanism for review. Following the first use of the school, the school facilities shall thereafter be used in accordance with approved CUA.

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Policy L8 of Medway Local Plan 2003.

- 38 Application for Reserved Matters relating to layout for any construction phase, shall show land reserved for parking or garaging in accordance with the

adopted Parking Standards. No building shall be occupied until the area for parking relevant to that building has been provided, surfaced and drained in accordance with the approved details. Thereafter no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking and re-enacting that Order) shall be carried out on the land so shown or in such a position as to preclude vehicular access to the reserved vehicle parking area.

Reason: Development without provision of adequate accommodation for the parking or garaging of vehicles would likely to lead to hazardous on-street parking and to accord with Policies T1 and T13 of the Medway Local Plan 2003.

- 39 Applications for Reserved Matters relating to landscaping for a phase or sub-phase shall include full details of both hard and soft landscape works, any artefacts to be located within the public space of that phase or sub-phase and a timetable for implementation. These details shall include existing and proposed finished ground levels; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; all paving and external hard surfacing; decking; minor artefacts and structures (play equipment, seating, refuse receptacles, planters, tree grilles, any other decorative feature(s)). Soft landscape works shall include details of planting plans, written specifications (including cultivation and other operations associated with grass and plant establishment, aftercare and maintenance); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

- 40 No part of the development within a construction phase shall be occupied until a Landscape Management Plan (LMP), has been submitted to and approved in writing by the Local Planning Authority. The LMP shall include long term design objectives, management responsibilities and maintenance schedules for all hard (including footpaths) and soft landscape areas (except for small, privately owned, domestic gardens) within that phase for a minimum period of five years and arrangements for implementation. The development shall thereafter be implemented in accordance with the approved details. Prior to any handover of the maintenance of the public landscape areas to a management company, there must be a site visit involving the LPA, the proposed landscape management company and the developer. The site visit will include a review of the site area proposed to be transferred to the management company and will assess whether the approved landscape plans have been implemented as approved, the condition and maintenance of all planting and what measures are necessary prior to a handover to the management company. The results of the site visit/walk over shall be submitted to and approved in writing by the Local Planning Authority and the

agreed requirements in terms of re-planting/maintenance shall be undertaken prior to any hand over to the management company.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

- 41 No commercial goods in connection with the ground floor commercial units proposed within apartment blocks A and B shall be loaded, unloaded, or otherwise handled and no delivery vehicles serving the proposed commercial units shall arrive or depart the commercial units outside the hours 07:00 to 19:00 Monday to Friday, 08:00 to 18:00 Saturday or at any time on Sunday or Public Holidays.

Reason: To protect residential amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 42 The proposed commercial within apartment blocks A and B shall only operate between the hours of 07:00 to 22:00 hours Mondays to Saturdays inclusive and between the hours of 07:30 and 21:00 hours on Sundays and Public Holidays.

Reason: To ensure that the development does not prejudice the amenities of the occupiers of neighbouring property in accordance with Policy BNE2 of the Medway Local Plan 2003.

- 43 No development within a construction phase shall take place until plans showing the scale of the Local Centre, including the floorspace and configuration of each individual unit, have been submitted to and approved in writing by the Local Planning Authority. The submission shall include evidence demonstrating that the scale of provision is appropriate to:

- The needs arising from the development;
- The needs of the existing village;
- The objective of supporting everyday trips being completed within the village;
- Measures to ensure the Local Centre delivers meaningful, everyday retail and community provision that meets local needs, avoiding the risk of units being occupied by niche or infrequent use businesses; and
- The requirements of emerging Local Plan Policy DM12 and paragraph 8.3.5 which requires growth at High Halstow to include additional retail and community provision with a quantum and form reflecting local needs, existing provision, and shopping patterns.

Development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure the Local Centre is of a scale and configuration that meets day to day needs, supports trip containment within High Halstow, and accords with the emerging Local Plan's strategy for local centres, thereby promoting

sustainable patterns of development and protecting the established retail hierarchy and paragraph 20 of the NPPF.

- 44 No development within a construction phase shall take place until a Local Centre Delivery Strategy has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall include:

- A timeline for the construction and leasing of Local Centre floorspace, demonstrating alignment with the rate of residential completions; and

The Strategy shall demonstrate compliance with emerging Local Plan Policy DM12 and SA9 criteria 7. Development shall thereafter be carried out in accordance with the approved Strategy.

Reason: To secure the timely and effective delivery of everyday retail and community facilities in parallel with housing occupation, ensuring the development functions as a sustainable neighbourhood and residents are not forced to travel for basic services, consistent with sustainability objectives and paragraph 20 of the NPPF.

- 45 No dwelling within the Reserved Matters construction phase(s) shall be occupied until the commercial floorspace within the approved Local Centre has been:

- Fully constructed;
- Fitted out to a specification suitable for immediate occupation; and
- Actively marketed for appropriate retail and community use.

Evidence demonstrating completion and readiness for occupation shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any dwelling within the Reserved Matters construction phase(s).

Reason: To guarantee that essential everyday services are available to residents as the community builds out, thereby reducing the need to travel, supporting the retail hierarchy, and ensuring the Local Centre fulfils its intended role within the masterplan and paragraph 20 of the NPPF.

- 46 No development within a construction phase shall commence until full details of the safeguarded bus routes have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:

- i) Swept path diagrams demonstrating the ability of a standard 12 metre single decker bus to manoeuvre along all safeguarded routes;
- ii) Evidence of appropriate parking restrictions necessary to ensure unobstructed bus movement;
- iii) Plans showing the location of safeguarded kerb and verge space for future bus stops;

- iv) Details of the mechanisms to protect safeguarded kerb and verge space for future bus stop use, irrespective of whether roads are adopted or privately managed; and
- v) Where roads are privately managed, a binding statement setting out how the developer or management company will enable the future construction and delivery of bus stops.

The development shall thereafter be carried out in full accordance with the approved details.

Reason: To ensure the development provides safeguarded and fully functional routes for future bus services, enabling sustainable movement patterns and supporting long term public transport provision, in accordance with paragraph 117 of the NPPF.

47 No development within a construction phase shall commence until detailed street designs relevant to the phase have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the design of:

- Cycle routes;
- Shared use pavements;
- Footways; and
- Crossing points.

The details shall identify the purpose of each route (pedestrian only, cycle only, or shared use), showing widths, surfaces, gradients, side road priority treatments and tactile/kerb details, designed in accordance with LTN 1/20 and Manual for Streets; where shared use is proposed, explicit justification against LTN 1/20 Section 6.5 and Table 6 3. A Wayfinding and legibility strategy (signage, mapping, and lighting locations) and inclusive design features and a delivery programme and occupation triggers (including any temporary arrangements)

The designs shall provide high quality and suitable walking and cycling infrastructure throughout the site, maximising permeability for active travel as illustrated on the indicative plans contained within the Transport Summary Statement. The designs shall also include suitable crossing points to all bus stops. Off road provision for walking and cycling shall be provided along all primary roads. All shared use spaces shall be clearly marked.

The development shall thereafter be carried out in full accordance with the approved details.

Reason: To ensure the provision of safe, direct, and attractive walking and cycling routes throughout the site, supporting sustainable travel choices and facilitating access to public transport, in accordance with paragraph 117 of the NPPF.

48 Notwithstanding the approved plans, no development shall commence on the section of street fronting the school until a detailed design for a School Street in this location has been submitted to and approved in writing by the Local Planning Authority. The submitted design shall demonstrate how measures to enable a School Street intervention to have been incorporated, including but not limited to:

- Physical restrictions on vehicular access during school start and finish times;
- Space for appropriate signage;
- Emergency access arrangements; and
- Safe and convenient pedestrian and cycle movement, particularly during periods of restricted vehicular access.

The development shall thereafter be carried out in full accordance with the approved details.

Reason: To ensure the street fronting the school is designed to safely and effectively accommodate a future School Street, supporting active travel, reducing school related traffic impacts, and enabling safe drop off and pickup arrangements, in accordance with emerging Local Plan Policy SA9 and the principles of Policy T12.

49 No development within a construction phase shall commence until plans for safeguarded bus stop locations along the internal road network that have been designed to accommodate buses as indicated on Figure 5 of the Transport Summary (December 2025) have been submitted to the Local Planning Authority for approval. The submitted details shall include

- Plans for safeguarded bus stop locations, demonstrating that sufficient land, infrastructure and electrical connections will be provided to enable the future installation of Real Time Information (RTI) to create a comfortable and attractive waiting environment that encourages bus use.

The development shall thereafter be carried out in accordance with the approved details.

Reason: To bus stops are designed to support high quality public transport infrastructure and encourage sustainable travel behaviour in accordance with paragraph 117 of the NPPF.

50 No part of the development hereby permitted shall be first occupied or brought into use until a detailed Travel Plan for that phase (Residential Travel Plan and/or School Travel Plan, as applicable) has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan(s) shall be based on the principles, objectives and framework measures set out within the submitted Framework Travel Plan, and shall include, but not be limited to:

- Updated baseline information, travel patterns and mode share targets appropriate to the relevant phase;
- SMART targets for achieving a reduction in single occupancy car journeys and an increase in sustainable travel modes;
- Full details of the Travel Plan Coordinator, including responsibilities, resourcing and management arrangements;
- A programme of measures for residents, staff, pupils and visitors to promote and encourage walking, cycling, public transport and other sustainable travel options;
- A programme of marketing and communication, including travel packs and information for new residents, staff and parents;
- Monitoring arrangements, including TRICS compliant surveys, timescales, performance indicators and reporting mechanisms to the Local Planning Authority;
- Review procedures, including triggers for remedial or additional measures should agreed targets not be met; and
- Implementation timetable, linked to the phased occupation of the development.

The Travel Plan(s) shall thereafter be fully implemented in accordance with the approved details from first occupation of each phase, and all measures, targets and monitoring shall be maintained and reviewed for a minimum period of five years from first occupation of that phase, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that sustainable travel is promoted and that the development minimises reliance on the private car, in the interests of highway efficiency, climate objectives and sustainable development.

- 51 No development within a construction phase above slab level shall take place until a full independent Road Safety Audit (Stages 1 and 2) together with the Designer's Response has been submitted to and approved in writing by the Local Planning Authority. The audit shall cover all proposed access works and off-site highway improvements associated with the development phase. Where the Audit identifies any actions or recommendations, a schedule of agreed measures and a timetable for their implementation shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Local Highway Authority. The development shall thereafter be carried out in full accordance with the approved details, and no part of the development shall be occupied until all agreed highway mitigation measures have been fully implemented.

Reason: To ensure the safety of all highway users in accordance with national and local transport and highway safety policy.

- 52 Applications for Reserved Matters for each construction phase shall include details of the measures to address climate change and energy efficiency for that phase. No dwelling within the relevant construction phase shall be occupied until a timetable for the submission of a verification report, prepared by a suitably qualified professional, has been submitted to and approved in

writing by the Local Planning Authority. The verification report shall confirm that all approved measures to address climate change and energy efficiency have been fully implemented for each building within that phase.

Verification reports shall thereafter be submitted to the Local Planning Authority in accordance with the approved timetable, and the approved measures shall be retained thereafter.

Reason: In the interests of sustainability and to ensure that the development positively addresses climate change in accordance with paragraph 164 of the National Planning Policy Framework 2024.

- 53 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no development permitted by Classes A, AA, B, C, D, E, F of Part 1, and Class A of Part 2 of the Order shall be carried out without the prior written consent of the Local Planning Authority.

Reason: To protect the amenities of the locality and neighbouring properties and to maintain a good quality environment.

- 54 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification), the dwellings approved as part of this hybrid application shall remain in use as a single family dwellinghouse falling within Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or any order amending, revoking and re-enacting that Order with or without modification) and no change of use to C4 shall be carried out unless planning permission has been granted on an application relating thereto.

Reason: To enable the Local Planning Authority to control such development in the interests of amenity, in accordance with Policy BNE2 of the Medway Local Plan 2003.

Conditions for Full/Detailed Consent

- 55 The development which forms Phase 1 (Detailed Phase) as defined on drawing number 24.138 0160.000 Rev 01 hereby permitted, shall begin before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 56 The development hereby permitted shall be carried out in accordance with the following approved plans:

Drawing Numbers received 11 April 2023

19.172 0201.000 P1 - Tavy Terrace
19.172 0201.001 P1 - Tavy Terrace (Brick & Boarding)
19.172 0202.000 P1 - Tavy Spey Terrace
19.172 0203.000 P1 - Buxton Semi Detached
19.172 0204.000 P1 - Buxton Terrace
19.172 0205.000 P1 - Buxton Terrace
19.172 0206.000 P1 - Fairford Detached
19.172 0210.000 P1 - Dart Semi Detached
19.172 0210.001 P1 - Dart Semi Detached (Brick & Boarding)
19.172 0211.000 P1 - Dart Terrace
19.172 0212.000 P1 - Dart Terrace
19.172 0212.001 P1 - Dart Terrace (Brick & Boarding)
19.172 0213.000 P1 - Cavendish Detached
19.172 0215.000 P1 - Cavendish & Portman Terrace
19.172 0216.000 P1 - Leamington Detached
19.172 0219.000 P1 - Stratford Detached
19.172 0220.000 P1 - Warwick Detached (Brick & Boarding)
19.172 0225.000 P1 - Tweed Semi Detached (Brick & Boarding)
19.172 0226.000 P1 - Cambridge Detached (Brick & Boarding)
19.172 0227.000 P1 - Harrogate Detached
19.172 0227.001 P1 - Harrogate Detached (Brick & Boarding)
19.172 0228.000 P1 - Henley Detached
19.172 0228.001 P1 - Henley Detached (Brick & Tile Hanging)
19.172 0229.000 P1 - Balmoral Detached
19.172 0230.000 P1 - Oxford Detached
19.172 0230.001 P1 - Oxford Detached (Brick & Tile Hanging)
19.172 0232.000 P1 - Richmond Detached
19.172 0232.001 P1 - Richmond Detached (Brick & Tile Hanging)
19.172 0233.000 P1 - Shaftesbury Detached
19.172 0233.001 P1 - Shaftesbury Detached (Brick & Boarding)
19.172 0234.000 P1 - Windsor Detached
19.172 0245.000 P1 - Hampstead Detached
19.172 0245.001 P1 - Hampstead Detached (Brick & Tile Hanging)
19.172 0245.002 P1 - Hampstead Detached (Brick & Render)
19.172 0246.001 P1 - Garage Plans & Elevations

Received 19 April 2023

19.172 0214.000 P1 Rev A - Cavendish & Portman Semi Detached
19.172 0214.001 P1 Rev A - Cavendish & Portman Semi Detached (Brick & Boarding)
19.172 0217.000 P1 Rev A - Portman Semi Detached (Brick)
19.172 0217.001 P1 Rev A - Portman Semi Detached (Brick & Boarding)
19.172 0218.000 P1 Rev A - Portman Detached

Received 9 May 2025

24.138 0001.000 P Rev 1 - Site Location Plan
24.138 0120.000 P Rev 1 - Parking Strategy Plan (Phase 1)
24.138 0121.000 P Rev 1 - Building Heights Strategy Plan (Phase 1)

24.138 0122.000 P Rev 1 - Unit Mix Strategy Plan (Phase 1)
24.138 0123.000 P Rev 1 - Unit Type Strategy Plan (Phase 1)
24.138 0124.000 P Rev 1 - Tenure Strategy Plan (Phase 1)
24.138 0125.000 P Rev 1 - Materials Strategy Plan (Phase 1)
24.138 0126.000 P Rev 1 - Refuse Strategy Plan (Phase 1)
24.138 0128.000 P Rev 1 - EV Charging Strategy Plan (Phase 1)
24.138 0129.000 P Rev 1 - Fire Strategy Plan (Phase 1)
24.138 0202.001 P Rev 1 - Tavy Spey Terrace (Brick)
24.138 0203.001 P Rev 1 - Tavy Spey Terrace (Brick)
24.138 0204.001 P Rev 1 - Buxton Semi Detached (Brick)
24.138 0205.001 P Rev 1 - Buxton Terrace (Brick)
24.138 0206.001 P Rev 1 - Fairford Detached (Brick)
24.138 0207.001 P Rev 1 - Kemble Detached (Brick)
24.138 0214.001 P Rev 1 - Letchworth Semi Detached (Brick)
24.138 0214.002 P Rev 1 - Letchworth Semi Detached (Render)
24.138 0215.001 P Rev 1 - Warwick Detached (Brick)
24.138 0215.002 P Rev 1 - Warwick Detached (Render)
24.138 0215.003 P Rev 1 - Warwick Detached (Cladding)
24.138 0216.001 P Rev 1 - Amberley Detached (Brick)
24.138 0217.001 P Rev 1 - Leamington Lifestyle Detached (Brick)
24.138 0217.002 P Rev 1 - Leamington Lifestyle Detached (Render)
24.138 0230.001 P Rev 1 - Tweed Semi Detached (Brick)
24.138 0231.003 P Rev 1 - Stamford (Cladding)
24.138 0232.003 P Rev 1 - Stamford Amberley Terrace (Cladding)
24.138 0233.001 P Rev 1 - Stratford Detached (Brick)
24.138 0234.001 P Rev 1 - Windsor Detached (Brick)
24.138 0234.002 P Rev 1 - Windsor Detached (Render)
24.138 0235.003 P Rev 1 - Portman Semi Detached (Cladding)
24.138 0236.001 P Rev 1 - Lincoln Semi Detached (Brick)
24.138 0237.001 P Rev 1 - Oxford Detached (Brick)
24.138 0237.002 P Rev 1 - Oxford Detached (Render)
24.138 0238.001 P Rev 1 - Cambridge Detached (Brick)
24.138 0238.002 P Rev 1 - Cambridge Detached (Render)
24.138 0238.003 P Rev 1 - Cambridge Detached (Cladding)
24.138 0239.001 P Rev 1 - Overton Detached (Brick)
24.138 0239.002 P Rev 1 - Overton Detached (Render)
24.138 0240.001 P Rev 1 - Chester Detached (Brick)
24.138 0241.001 P Rev 1 - Harrogate Detached (Brick)
24.138 0241.003 P Rev 1 - Harrogate Detached (Cladding)
24.138 0242.001 P Rev 1 - Winchester Detached (Brick)
24.138 0242.002 P Rev 1 - Winchester Detached (Render)
24.138 0243.001 P Rev 1 - Henley Detached (Brick)
24.138 0244.001 P Rev 1 - Richmond Detached (Brick)
24.138 0244.002 P Rev 1 - Richmond Detached (Render)
24.138 0250.001 P Rev 1 - Hampstead Detached (Brick)
24.138 0250.002 P Rev 1 - Hampstead Detached (Render)
24.138 0251.001 P Rev 1 - Blenheim Detached (Brick)
24.138 0252.001 P Rev 1 - Sandringham Detached (Brick)
24.138 0260.000 P Rev 1 - Proposed Ground Floor & First Floor Apartment
Block A

24.138 0261.000 P Rev 1 - Proposed Second Floor & Roof Plan Apartment Block A
24.138 0262.000 P Rev 1 - Proposed Elevations Apartment Block A
24.138 0265.000 P Rev 1 - Proposed Ground Floor & First Floor Apartment Block B
24.138 0266.000 P Rev 1 - Proposed Second Floor & Roof Plan Apartment Block B
24.138 0267.000 P Rev 1 - Proposed Elevations Apartment Block B
24.138 0270.000 P Rev 1 - Garage Plans and Elevations
24.138 0300.000 P Rev 1 - Proposed Street Elevation A-A
24.138 0301.000 P Rev 1 - Proposed Street Elevation B-B
24.138 0302.000 P Rev 1 - Proposed Street Elevation C-C
24.138 0303.000 P Rev 1 - Proposed Street Elevation D-D
LN-LD-100 Rev P3 - Phase 1 Hard & Soft Landscape Plan (Overall)

Received 10 June 2025

24.138 0210.001 P Rev 2 - Dart Semi Detached (Brick)
24.138 0211.001 P Rev 2 - Dart (Brick)
24.138 0212.001 P Rev 2 - Dart Spey Terrace (Brick)
24.138 0213.001 P Rev 2 - Dart Spey (Brick)

Received 30 July 2025

24.138 0101.000 P Rev 2 - Proposed Site Plan (Phase 1)

Received 29 October 2025

271568-00-047-05 Rev A - Transport Proposal Overview 1 of 2
271568-00-047-05 Rev A - Transport Proposal Overview 2 of 2
271568-00-047-06 Rev A - Transport Proposal Overview
271568-00-047-07 Rev A - Transport Proposal Overview
271568-00-047-08 Rev A - Transport Proposal Overview
271568-00-047-09 Rev A - Swept Path Analysis Refuse & Fire Tender 1 of 2
271568-00-047-09 Rev A - Swept Path Analysis Refuse & Fire Tender 2 of 2
271568-00-047-10 Rev A - Swept Path Analysis Bus & Large Car 1 of 2
271568-00-047-10 Rev A - Swept Path Analysis Bus & Large Car 2 of 2
271568-00-047-12 Rev A - Site Access Swept Path

Reason: For the avoidance of doubt and in the interests of proper planning.

- 57 No development above slab level within Phase 1 (Detailed Phase) shall take place until details and samples of all materials to be used externally have been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

58 No development above slab level within Phase 1 (Detailed Phase) shall take place until the following architectural details have been submitted to and approved in writing by the Local Planning Authority. These details shall include 1:20 drawings (as a minimum) of window frames and cills, doors, door frames and cills, weatherboarding, fascia's, soffits and porches. The development shall be implemented in accordance with the approved details retained thereafter.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

59 No part of the development within Phase 1 (Detailed Phase) shall be occupied until full details of both hard and soft landscape works and a timetable for implementation has been submitted to and approved in writing by the Local Planning Authority. These details shall include all public seating, footpaths, litter and dog bins, paving, underground utilities and recreation space. Soft landscape works shall include details of planting plans, soil volumes, tree pit details, tree ties and stakes, written specifications (including cultivation and other operations associated with grass and plant establishment, aftercare and maintenance); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate. The development shall be implemented in accordance with the approved details and any trees or plants which within 5 years of planting are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

60 No development above slab level within Phase 1 (Detailed Phase) shall take place, until details of the provision of electric vehicle charging points as shown on drawing number 24.138 0128.000 P Rev 01 (EV Charging Strategy Plan) have been submitted to and approved in writing by the Local Planning Authority. Details shall include the location, charging type (power output and charging speed), associated infrastructure and timetable for installation. The development shall be implemented in accordance with the approved details and shall thereafter be maintained in working order.

Reason: In the interests of sustainability in accordance with paragraph 117E of National Planning Policy Framework 2024.

61 No part of the development within Phase 1 (Detailed Phase) shall be occupied until a Landscape Management Plan (LMP), shall be submitted to and approved in writing by the Local Planning Authority. The LMP shall include long term design objectives, management responsibilities and maintenance schedules for all hard (including footpaths) and soft landscape areas (except for small, privately owned, domestic gardens) for a minimum period of five years and arrangements for implementation. The development shall

thereafter be implemented in accordance with the approved details. Prior to any handover of the maintenance of the public landscape areas to a management company, there must be a site visit involving the LPA, the proposed landscape management company and the developer. The site visit will include a review of the site area proposed to be transferred to the management company and will assess whether the approved landscape plans have been implemented as approved, the condition and maintenance of all planting and what measures are necessary prior to a handover to the management company. The results of the site visit/walk over shall be submitted to and approved in writing by the Local Planning Authority and the agreed requirements in terms of re-planting/maintenance shall be undertaken prior to any hand over to the management company.

Reason: To ensure a satisfactory external appearance and provision for landscaping in accordance with Policies BNE1 and BNE6 of the Medway Local Plan 2003.

- 62 No part of the development within Phase 1 (Detailed Phase) shall be occupied until details of the proposed external lighting scheme including a plan showing the lighting design, underground cabling and location of the lighting has been submitted to and approved in writing by the Local Planning Authority. The plan shall include details of the height, position, external appearance, any shielding, light intensity, colour, spillage (such as light contour or lux level plans showing the existing and proposed levels), demonstrating that areas to be lit will not disturb bats and other nocturnal animals. All external lighting will be installed in accordance with the approved details and shall be maintained thereafter.

Reason: To ensure protection of residential amenities and ecological interests of the site in accordance with Policy BNE2 and BNE37 of the Medway Local Plan 2003.

- 63 No part of the development within Phase 1 (Detailed Phase) shall be occupied until details of the cycle parking strategy for phase 1, for both commercial and residential uses including position, design, materials and finishes, have been submitted to and approved in writing by the Local Planning Authority. The Strategy shall also include the quantum and type of spaces, visitor provision in the public realm, and provision for non-standard cycles. The approved details shall be implemented prior to the occupation of Phase 1 and thereafter retained for the parking of cycles.

Reason: In order that the development makes satisfactory provision for cycles and to meet the objectives of sustainable development.

- 64 No part of the development within Phase 1 (Detailed Phase) shall be occupied until details of refuse and recycling storage for this phase, including both commercial and residential uses, have been submitted to and approved in writing by the Local Planning Authority. The approved refuse and recycling storage facilities shall be implemented prior to the occupation of phase 1 and thereafter retained.

Reason: To ensure that adequate provision is made for the storage of refuse and recyclable materials and to protect the character and amenity of the area.

- 65 No part of the development within Phase 1 (Detailed Phase) shall be occupied until a plan indicating the positions, design, materials and type of boundary treatment to be erected has been submitted to and approved in writing by the Local Planning Authority. The boundary treatment shall be completed in accordance with the approved details before the building to which they relate are first occupied and shall thereafter be retained.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

- 66 No part of the development within Phase 1 (Detailed Phase) shall be occupied until the areas shown on the submitted layouts as vehicle parking spaces/garaging for the residential and commercial elements of the phase has been provided, surfaced and drained. Thereafter they shall be kept available for such use and no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any order amending, revoking or re-enacting that Order) shall be carried out on the land so shown or in such a position as to preclude vehicular access to this reserved parking space/garaging and visitor spaces.

Reason: Development without provision of adequate accommodation for the parking or garaging of vehicles is likely to lead to hazardous on-street parking and in accordance with Policies T1 and T13 of the Medway Local Plan 2003.

- 67 Prior to the first occupation of any dwelling within Phase 1 (Detailed Phase), full details of the proposed equipped play facilities, comprising 1 x Local Area of Play (LAP), 1 x Local Equipped Area of Play (LEAP), and associated informal play spaces, together with specifications of the play equipment, safety surfacing, boundary treatments, bins and signage shall be submitted to and approved in writing by the Local Planning Authority. The submission shall include a timetable for the delivery of the play facilities within Phase 1. The play areas shall thereafter be provided in accordance with the approved details and the agreed timetable.

Reason: To ensure the satisfactory provision of play equipment in accordance with Policy L4 of the Medway Local Plan 2003.

- 68 The Phase 1 (Detailed) development shall be implemented in accordance with the measures to address energy efficiency and climate change as set out within Climate Change and Energy Efficiency Statement (dated May 2025). Prior to final occupation of the development within Phase 1, a verification report prepared by a suitably qualified professional shall be submitted to and approved in writing by the Local Planning Authority confirming that all the approved measures within that phase have been undertaken and will thereafter be maintained.

Reason: In the interests of sustainability and to positively address concerns regarding climate change in accordance with paragraph 161 the National Planning Policy Framework 2024.

- 69 No part of the development within Phase 1 (Detailed Phase) shall be occupied until the visibility splays at the junction of the application site with Christmas Lane have been provided in accordance with the details on drawing number 271568-00-047-12 Rev A. Once provided, the splays shall thereafter be retained and kept free of all obstructions over a height of 0.6 metre above adjoining carriageway level.

Reason: In the interests of highway safety and in compliance with Policy T2 of Medway Local Plan 2003.

- 70 No part of the development within Phase 1 (Detailed Phase) shall be occupied until details of the following highway and Public Right of Way improvements have been submitted and approved in writing by the Local Planning Authority and in accordance with relevant consents obtained from the Highways Authority. Details shall include a timetable for the implementation and delivery of these improvements with delivery triggers tied to early occupation.

- Proposed footpath connection on northern side of Christmas Lane that connects from within the site to the existing footway at the entrance to High Halstow Village as outlined on drawing 271568-00-047-07 Rev A;
- Proposed upgrades and enhancements to Public Right of Way RS44 connecting to the existing Village including the removal of the fence and bridge ditch as outlined on drawing 271568-00-047-07 Rev A,

Reason: To ensure the development is sustainable and in accordance with Policies T1, T2 and T3 of the Medway Local Plan 2003.

- 71 The development herein approved shall be carried out in accordance with the Environmental Statement (ES) (ICENI) (dated March 2023) Chapters 1-14 and Technical Appendices 1.1 - 14.2 and ES Non-Technical Summary Volume III received 11 April 2023 and Environmental Statement Addendum (ICENI) (dated May 2025) Chapters 1-14 and Technical Appendices A1 - A9 including Revised ES Non-Technical Summary Volume III received 19 May 2025.

Reason: Having regard to the Town and Country Planning (Environmental Impact Assessment) (Regulations 2017) against which the development has been assessed and that any material alteration to the design principles and development objectives may have an impact which has not been fully assessed.

- 72 No more than 350 dwellings within the development hereby permitted shall be occupied until the strategic transport interventions identified as necessary to mitigate the impacts of the development have been delivered and are fully operational.

For the purpose of this condition strategic transport interventions shall include but not be limited to the offsite highway mitigation measures secured through the Section 106 Agreement including improvements to Four Elms, Sans Pareil, Main Road, Ropers Lane and any other junctions or links identified by the Council

Occupation beyond the 350th dwelling shall not commence until the Local Planning Authority has confirmed in writing that the required transport interventions have been completed and are available for public use

Reason To ensure that the development does not result in an unacceptable impact on the safe and efficient operation of the local and strategic highway network

Proposal

The proposal is submitted as part detailed and part outline within a Hybrid Planning Application for:

- (i) Full Planning Application (Phase 1) for the construction of 270 residential units (including affordable housing) and a local centre (up to 1000 sqm Use Classes E and F) with open space, associated vehicle, cycle and pedestrian access off Christmas Lane, upgrade of existing Public Right of Way, associated services and infrastructure, public realm, landscaping and SuDS. (with associated highway works); and
- (ii) Outline Planning Application (all matters except for access, to be reserved for future determination) for the construction of up to 490 residential units (including affordable housing), and a primary school (Use Class F1(a)) with new vehicular access points, car and cycle facilities and provision of public open space, sustainable drainage and landscaping works.

The site is located to the east of the village of High Halstow, and directly adjacent to the edge of the existing settlement boundary (Cardigan Close). It is situated on the Hoo Peninsula, which lies between the River Thames to the north and River Medway to the south. The large built-up area of Hoo is located approx. 2km to the south. The site comprises approximately 40.69 hectares of open arable farmland, a broad plateau of gently undulating elevated land rising above low-lying coastal marshes to the north and south and is characterised by a series of small valleys associated with minor watercourses.

The site is bound by the village to the west, Britannia Road to the north, Christmas Lane to the south and ancient woodland and the rear boundaries of properties fronting Sharnal Street to the east. Residential properties lie immediately to the west, and the wider countryside containing some scattered and ribbon development lies to the south, east and west. The site boundary wraps around a small pocket of ancient woodland (Fisher's Wood) to the east. The application has been supported by a site-wide Indicative Masterplan and Parameter Plans, showing how the detailed component could be brought forward, alongside the outline component for the latter phases. The outline component is submitted with access to be determined at this

stage, and all other matters, including layout, appearance, scale, and landscaping to be considered under a reserved matters proposal.

The detailed component (Phase 1a) comprises residential mixed-use development accommodating 270 residential units, (including affordable housing), and a Local Centre (of up to approx. 1000 sqm Use Classes E and F). It also seeks to secure open space, public realm, landscaping and the implementation of sustainable drainage systems (SuDS). The open space (identified as the 'Central Greenway') is located in the centre of the site, bisecting the site north-to-south. The detailed component also seeks to secure associated vehicle, cycle and pedestrian access off Christmas Lane, upgrades to the existing PROW and associated services / infrastructure.

In addition to Phase 1a, Phase 1b will comprise the land for the 2 Form Entry (FE) Primary School that will be prepared in Phase 1 but included in the outline component. The land will then be transferred by the developer, and its delivery will come forward as a separate Reserved Matters Application.

The outline component comprises Phases 2 (up to 245 residential units) and 3 (up to 245 residential units). The Phase 2 area is envisaged as a continuation of the west village northwards, encompassing the remaining section of the PROW and linking with Britannia Road. The Phase 3 area will comprise the remaining development parcels and open space areas. This will provide a further vehicular access to Britannia Road and a connection to the existing roundabout at Sharnal Street and Ratcliffe Way. Pedestrian links connecting to Sharnal Street will also be provided as part of these phases. The proposed residential type and mix is broken down as phases as shown below. As they are in outline the type and mix for Phases 2 and 3 are indicative at this stage.

Size	1 bed flat	2 bed flat	2 bed house	3 bed house	4+ bed house	Total
Phase 1	16	20	35	40	159	270
Phase 2	5	10	50	90	90	245
Phase 3	5	10	60	85	85	245
Total	26	40	145	215	334	760

The Densities Parcel Parameter Plan that has been submitted alongside the application shows the density parcels across the proposed development, with a density range from 35 up to 50 dwellings per hectare. A higher density is proposed for development around The Square in the Central and Western Neighbourhoods, which is reflective of the existing densities in this area. Lower density development is proposed around the periphery of the site. The buildings across the site will be relatively consistent in massing ranging from 2 to 3 storeys, as depicted in the Building Heights Parameter Plan.

It is envisaged that the Local Centre will be a mixed-use development comprising Use Class E and/or Class F and could provide one large single space allowance for a local convenience / grocery store, with further allowance in other units for other retail outlets, community hub and possibly leisure provision.

The 2FE Primary School is to be located in close proximity to the existing village and PROW, and within the proposed development the school site is located off the east of the Local Centre. The Primary School will serve the existing pupils of High Halstow, as well as the new pupils generated by the proposed development. Once operational, it is envisaged that the existing High Halstow Primary Academy situated in the village will relocate to the new school. The Primary School is included in the outline component and will come forward as a separate Reserved Matters Application in the future and will need to comply with the parameters set as part of the outline component. It is also proposed that a Multi-Use Games Area ('MUGA') will be located within the proposed grounds of the Primary School and will be designed to be used by both the school pupils, as well as the local community.

The proposed development provides primary vehicular access routes off the existing Christmas Lane and Britannia Road, as well as from the existing roundabout at the junction of Ratcliffe Way and Sharnal Street. Five primary accesses are proposed for vehicular access into the proposed development and would include a proposed fourth arm to the roundabout on Sharnal Street.

A network of primary and secondary routes will provide vehicular access throughout the site and facilitate the movement of buses whilst the tertiary and local access roads will ensure vehicular access to the residential units. The street typologies for the proposed development would result in a clear highway hierarchy and consist of:

- Primary Streets: Avenues, Boulevards and Main Streets;
- Secondary Streets: Local Streets and Access Streets; and
- Tertiary Streets: Lanes, home-zones.

The Open Space Parameter Plan outlines that the proposed development will provide approx. 14.06 hectares of open space across the site, including parks & gardens, play areas, natural/semi-natural green space, amenity green space and allotments/community gardens. Proposed SuDS features will also be incorporated which will include swales, rain gardens, ponds, attenuation basins, and permeable paving.

Phase 1a – Full Application

The layout for Phase 1 comprises both the main access points from Christmas Lane, as well as the Western Gateway and Central Greenway adjacent to the school site. The parcel contains open spaces and edge buffers which link with the overall open space proposals across the wider development.

The proposed dwellings will comprise a mixed material palette. Key design features have also been incorporated including a mixture of roof forms and scale to create a varied and interesting streetscape and linear building frontages and pitched roofs running parallel to the street.

Two primary priority-controlled access points are proposed via Christmas Lane. Three pedestrian and cycle access points will also be located along Christmas Lane, two access points on Britannia Road and one access point on the western boundary.

Car parking is proposed to be provided in a mix of forms including elements of allocated private parking either on-plot or within small parking courts close to individual houses and visitor parking spaces on street. All houses and private flats with allocated spaces will be provided with one electric vehicle ('EV') charging point per dwelling.

Site Area/Density

Site Area: 40.69 hectares (100.5 acres)

Site Density: 19 dph (8 dpa)

Relevant Planning History

- MC/20/0721 Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 (as amended) - request for a scoping opinion for provision of up to 790 dwellings (use class C3); 2-Form Entry (2FE) primary school; provision of a retail unit or GP/pharmacy (use class A1/D1); new vehicular access points, car and cycle facilities and provision of public open space, public realm, sustainable drainage and landscaping works.
Decision: EIA Scoping Opinion Provided
Decided: 23 April 2020
- MC/21/1086 Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 (as amended) - Request for clarification and some additional information in relation to socio- economics and health, ecology, archaeology, green infrastructure strategy, lighting assessment, contamination and cumulative assessment update to previous scoping opinion - MC/20/0721 for provision of up to 790 dwellings (use class C3); 2-Form Entry (2FE) primary school; provision of a retail unit or GP/pharmacy (use class A1/D1); new vehicular access points, car and cycle facilities and provision of public open space, public realm, sustainable drainage and landscaping works.
Decision: No objection to EIA Approach
Decided: 28 May 2021

Representations

The application has been advertised on site, in the press and by individual neighbour notification to the owners and occupiers of neighbouring properties. Southern Water, National Highways, Historic England, Lower Medway Drainage Board, Sports England, National Grid, National Planning Casework Unit, Marine Management Organisation, Active Travel England, KCC Biodiversity, KCC Archaeology, UK Power Networks, Southern Gas Networks, The Environment Agency, Royal Society for Protection of Birds, Natural England, Kent Wildlife Trust, Woodland Trust, The Countryside Charity, Kent Police and High Halstow Parish Council have also been consulted.

62 letters of representation have been received objecting to the application and raising the following concerns:

- Permanent loss of ~40.6 ha of Best and Most Versatile (BMV) agricultural land;
- Urbanisation of open countryside and rural lanes (contrary to BNE25 & BNE47);
- Proximity to protected habitats (SSSI, SPA, Ramsar);
- Noise impacts from proposed MUGA;
- Highways reliance on constrained A228/Four Elms Hill;
- Harms to countryside character, BMV land, biodiversity, air quality, amenity, and infrastructure significantly outweigh claimed benefits;
- Relies on urbanising interventions and unfunded strategic projects for transport, undermining sustainable access goals;
- Suburbanisation of Valued Landscape east of village;
- Erosion of green wedges, risking settlement coalescence;
- Intrusion into key views and loss of local distinctiveness;
- Significant hedgerow/tree loss;
- Concerns over flooding and drainage;
- Contrary to adopted Local Plan;
- Impact on environment and wildlife;
- Houses are not affordable;
- Development is unsustainable and would be reliant on private motor vehicle;
- Lack of local infrastructure and the pressure on existing services (Doctors, Schools, Hospitals, Dentists);
- Impact on Fishers Wood Ancient Woodland;
- Housing mix is not suitable;
- Increased congestion in the local area;
- Public transport is insufficient;
- Visual impact of development;
- Highway safety concerns;
- Increased fear of crime;
- Impact on climate change and global warming;
- Development will not enhance the appearance or attraction of area;
- Impact on existing utilities;
- Loss of privacy and light to adjacent properties;
- Air Quality Impacts;
- Noise Pollution;
- Impact during construction;
- Impact on Four Elm's roundabout;
- Conflict with the High Halstow Neighbourhood Plan (Policies HHE2, HHE3 and HHE4).

One letter of support was also received from the Leigh Academies Trust.

Southern Water have provided standing advice regarding distribution main clearance distances, excavation practices, tree planting and the location of SuDS. They have also undertaken a desktop study of the impact from the additional foul sewerage flows from the proposed development. This initial study indicates that

these additional flows may lead to an increased risk of foul flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will need to be provided by Southern Water in consultation with the developer. They have also advised that it is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

National Highways originally raised a holding objection based on the concerns they had regarding the potential impact of the proposal on the safe and efficient operation of the Strategic Road Network (SRN), particularly within the vicinity of the M2 junction 1. However, and following the submission of additional information by the applicants Transport Consultants National Highways have subsequently removed their objection. Accordingly, and subject to a condition in respect to a Construction Environmental Management Plan (CEMP) they are content that the development would not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN in the vicinity of the site.

Historic England have suggested that the Council should seek the views of their specialist conservation and archaeological advisers.

The Lower Medway Drainage Board have advised that the site is adequately sized to accommodate attenuation for both the full and outline elements of the planning application, and they welcome proposals for utilising a variety of SuDS features for surface water storage with multiple connections to the onward drainage network. They have also recommended that the proposed works to address deficiencies in the existing drainage network are undertaken prior to development. They have also requested conditions in respect to the proposed SuDS features including maintenance schedules.

Sports England object to the application on the grounds that the amended scheme removes previously proposed onsite sports provision, including the cricket pitch at *The Green*, and provides no formal onsite provision to meet the sporting demand generated by the development; furthermore, the applicant has not supplied any details of the proposed financial contribution towards outdoor sport or how impacts on indoor sports provision will be mitigated, leading Sport England to conclude that the scheme would place additional pressure on local facilities and fails to demonstrate how the sporting needs of the new community will be met.

The Marine Management Organisation have not commented directly on the merits of the application; however, they have provided their standing advice in relation to Marine Licensing, Marine Planning, Wildlife Licensing, Commercial Fisheries and other marine uses.

Active Travel England (ATE) has advised that the proposed enhancement of the Public Right of Way (PRoW) to the west of the site is contingent on securing landowner agreement. They have also questioned the dependence on peak-time data, noting that this approach risks overlooking trips occurring outside peak periods. Additionally, they have questioned why fully segregated routes for cyclists and pedestrians cannot be provided wherever feasible. Active Travel England has also

commented on the design of general car parking arrangements and confirmed that a final Travel Plan must be secured through a planning condition or Section 106 agreement, which they will review once submitted. On the basis of the above ATE have issued a holding objection.

KCC Biodiversity advises that additional information is required. KCC has identified a requirement for further supporting information, including: a countersigned Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate (IACPC); an agreed mitigation strategy with Natural England and the RSPB for impacts on Northward Hill SSSI; clarity on the extent of reptile habitat lost and the adequacy/location of reptile receptor sites; and amendments to the ecological plans to secure a minimum 20-metre ancient woodland buffer.

KCC Archaeology have advised that the Archaeology chapter of the ES sets out proposals for mitigation works to offset the harm that will result from the proposed development. These mitigation works have been formulated in discussions with KCC Heritage Conservation. The ES suggests that further evaluation work could be carried out post determination as a condition of any forthcoming planning consent. KCC suggest such an approach seems reasonable. Subject to conditions to secure this they raise no objections.

The Environment Agency have written to advise that they have no objections subject to conditions in respect to contamination and drainage.

SGN have advised that there is a high-pressure pipeline in the vicinity of the proposed development. The proposals would, therefore, require the exact location of this pipeline and other SGN assets to be located before any work commences, either by electronic detection or by hand excavated trial holes. They have also provided standing advice with regards to mechanical excavations near low/medium and intermediate gas pressure mains. They have also advised that safe digging practices in accordance with HSE HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains pipes, services and other apparatus.

Natural England raise no objection subject to securing the appropriate financial contribution to the Thames, Medway and Swale Estuaries Strategic Access and Monitoring Strategy (SAMMS) as well as a package of mitigation measures for Northward Hill SSSI as described in Chapter 7 of the applicant's Environmental Statement. They have also provided standing advice in respect to considering any impacts on ancient woodland as well as further general advice on the consideration of protected species and other natural environment issues.

The RSPB have objected to the application on the basis that the costs for providing a 3.7 km section of fencing on land within Northward Hill SSSI to mitigate the effects of increased recreational disturbance have not been secured.

The Woodland Trust have objected to the application due to its potential impact on Fisher's Wood Ancient Woodland and its subsequent deterioration. This is associated with increased recreational disturbance and cat predation. They have also recommended a minimum 50m buffer to the Ancient Woodland.

The Countryside Charity have objected to the application on the basis that the development is contrary to the adopted local plan, the development is not in a sustainable location, and it would result in the loss of best and most versatile agricultural land.

Kent Police have welcomed further discussions with the applicant/agent about site specific designing out crime approaches and have provided additional advice with respect to lighting, boundary treatments, natural surveillance and other approaches that could be implemented within the development.

High Halstow Parish Council objects to the proposed development. The Parish argues that the scheme is unsustainable, remote from essential services and infrastructure, and contrary to countryside protection policies in the adopted Medway Local Plan. They highlight severe harm to the rural landscape, irreversible loss of best and most versatile agricultural land, and significant biodiversity impacts, including increased recreational pressure on internationally protected sites. The objection also cites the flawed spatial strategy in the Regulation 22 Local Plan, which they consider unsound and undeliverable, particularly following the withdrawal of £170 million Housing Infrastructure Fund support. The Parish stresses that the development would double the village size without adequate infrastructure, exacerbate traffic and pollution, and fail to meet NPPF sustainability principles. They request refusal of the application or deferral until after the Regulation 22 Local Plan have been through examination.

The Independent Group (TIG) have submitted two rebuttals objecting to the application on the grounds of Transport and Access and Environment and Ecology. A summary of those rebuttals is included below:

Transport and Access

This representation objects on transport and access grounds and provides a rebuttal to documents submitted by the applicant. The transport submission does not robustly demonstrate that the development would deliver safe and suitable access for all users, nor that sustainable travel opportunities have been properly realised, as required by National Planning Policy Framework (NPPF). Active Travel England (ATE) has issued a Deferral / not in a position to support position and requests further evidence and revisions (LTN 1/20 assessments, design detail, audits, trip assessment beyond peaks, and enforceable travel plan measures). That is highly material to whether the NPPF tests are met. The applicant's own transport material confirms that a key PRoW walking connection to the village (towards Topley Drive) is proposed "subject to landowner agreement". Where essential sustainable access depends on third-party land and is not secured, the Local Planning Authority (LPA) cannot rely on it to justify mode shift or safety outcomes.

The TA contains claims that the site is near "good frequency bus routes" and that residents will be within 400m of a bus stop (because the site is ~400m wide). However, the service offer described in transport baseline and the draft neighbourhood plan evidence is not high frequency, and reliability is a known issue locally. Stop proximity does not equal a viable alternative without frequency and reliability. Medway Council's own Strategic Transport Assessment (STA) evidence

base for the emerging new Local Plan defines “over capacity” conditions and reports multiple locations/corridors operating close to, or beyond, capacity in forecast scenarios, including “over capacity” V/C and junction DoS results >100%. This supports the objection that the wider network is constrained and that additional car-dependent demand increases the risk of severe residual cumulative impacts unless mitigation and mode shift are proven, deliverable and enforceable. Requested outcome: Refuse on transport/access grounds; or at minimum defer pending a coherent, LTN 1/20-compliant, deliverable and enforceable transport package addressing ATE’s Deferral points and resolving outstanding strategic matters.

Environment and Ecology

The rebuttal objects on environmental and ecological grounds, arguing that the proposal fails to demonstrate compliance with the NPPF and the Medway Local Plan in relation to designated sites, irreplaceable habitats and biodiversity protection. The representation notes that the applicant’s Environmental Statement relies heavily on mitigation packages that are not yet agreed, secured or fully costed, meaning the council cannot be confident that significant ecological effects would be acceptably addressed.

A core concern relates to Northward Hill SSSI, where the applicant proposes fencing to mitigate recreational disturbance. The RSPB maintains a strong objection because long-term funding and specification for this mitigation remain unagreed, and Natural England’s conditional “no objection” depends on this package being fully secured before permission is granted. As the ES acknowledges significant adverse effects in the absence of this mitigation, the rebuttal concludes that the council cannot lawfully determine the SSSI impacts to be acceptable

The rebuttal also identifies risks to Fisher’s Wood. The Woodland Trust and KCC Biodiversity state that buffer distances are insufficient, and that the applicant has not demonstrated the development would avoid deterioration of this irreplaceable habitat. As development affecting ancient woodland is subject to the NPPF’s strict refusal tests, the representation considers the scheme to be in conflict with the NPPF.

Concerns are also raised regarding Biodiversity Net Gain (BNG), with current assessments indicating reduced gains and heavy reliance on long-term management measures that are not yet secured. The rebuttal argues that the claimed BNG outcomes cannot be treated as reliable without binding mechanisms, funding arrangements and monitoring commitments. Additional objections highlight risks from lighting and wider urbanisation effects, particularly given the sensitivity of nearby designated sites and dark-sky policies in the emerging neighbourhood plan.

In summary, the rebuttal concludes that the application should be refused because mitigation for designated sites is not demonstrably deliverable, impacts on ancient woodland have not been shown to be avoided, and ecological outcomes lack the certainty required at decision stage. It states that these issues are fundamental and cannot be deferred for resolution after permission is granted.

Councillor George Crozer has objected to the application on the grounds that the application is being brought forward for determination before the independent examination of the emerging Medway Local Plan 2041. He argues this would undermine the plan-led system and prematurely pre-judge Policy SA9, which proposes allocating land east of High Halstow for major development but currently carries limited weight due to substantial objections and the need for Inspector scrutiny.

A major issue raised is the withdrawal of the £170m Housing Infrastructure Fund (HIF), which the original Transport Assessment relied on to provide strategic transport improvements for the Hoo Peninsula. Updated assessments now indicate the site is only partially deliverable, with Redrow suggesting that only around 250 homes could be built in the next seven years without further unfunded infrastructure. Beyond this level, no credible transport mitigation is identified, particularly for the already-at-capacity Four Elms Junction, which the Councillor argues would lead to further congestion and inappropriate rerouting onto rural lanes.

The objection letter also disputes Redrow's presentation of a "wider vision" for a new community on the peninsula, stating it misrepresents the High Halstow Neighbourhood Plan and ignores key environmental and sustainability constraints. The Parish Council considers the emerging Local Plan's spatial strategy for the area flawed without firm transport and environmental solutions, and, therefore, of limited relevance in decision-making prior to adoption.

The Councillor further notes a lack of expected support from Medway Council in aligning emerging Local Plan policies with the developing Neighbourhood Plan, contrary to government guidance. He argues that current proposals are not sustainable development in NPPF terms and conflict with Medway's adopted Local Plan.

In conclusion, the Councillor states that Medway Council and High Halstow Parish Council are now in direct conflict regarding applicable policy. They therefore request that application MC/23/0855 not be determined until after the public examination of the Local Plan later in the year, ensuring decisions remain properly plan-led.

EIA Screening

In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, a formal Scoping Opinion request was submitted to Medway Council on 19 March 2020 (MC/20/0721), followed by a request for additional clarification on 15 April 2021 (MC/21/1086). Medway Council issued the Environmental Scoping Opinion in response to these requests, confirming that the recommended environmental topics for inclusion in the Environmental Statement would satisfy the statutory requirements of the EIA Regulations. In line with this Scoping Opinion, the application is supported by an Environmental Statement (ES) prepared by Icen Projects, which presents the findings of the Environmental Impact Assessment and evaluates the potential environmental effects of the proposed development. The relevant ES chapters are addressed under separate headings within this report.

Development Plan

The Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan). The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework December 2024 (the NPPF) and are generally considered to conform. Where non-conformity exists, this will be highlighted and addressed in the appraisal section below. The Medway Landscape Character Assessment 2011 (the MLCA), as updated June 2024 is also applicable.

In addition, the Final draft (Regulation 22) Local Plan - Medway Local Plan 2041 was submitted to the Inspectorate for examination in December 2025. The policies within this version of the Final draft plan have weight in the determination of planning (and associated) applications and relevant policies have been referenced where applicable in this report.

Although High Halstow were in the process of producing a Neighbourhood Plan this was formerly withdrawn from examination by the Parish Council in October 2023. As the plan is withdrawn the policies contained within it have no status in the Development Plan or any planning weight.

Planning Appraisal

Principle

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

The site is located outside the built confines of High Halstow as defined in the proposal maps to the adopted Local Plan and, therefore, lies within open countryside. As such, the principle of the proposed development would fall outside of the development strategy as set out in the Local Plan. Policies S1 and S2 of the Local Plan seek to prioritise development within the existing urban fabric and then strategically sustainable sites using a sequential approach to location. Policy BNE25 of the Local Plan is also applicable and sets out the approach for development in the open countryside. This policy states that development in the countryside will only be permitted if it maintains or enhances the character, amenity and functioning of the countryside, offers a realistic chance of access by a range of transport modes and meets one of the listed exceptions. Mainly it is on a site allocated for that use; the development essentially demands a rural location, or it would involve the re-use or adaption of an existing built-up area. In this regard, the site is not allocated for housing or any redevelopment within the adopted Local Plan. Thus, the development would also conflict with this Policy. The site has no other land-based designations within the Local Plan.

Policies S2 and S4 of the (Regulation 22) Medway Local Plan 2041 also seek to protect and enhance the natural environment and biodiversity including the natural beauty of the landscape and require that development proposals demonstrate how they respect and respond to the character, key sensitivities, and qualities of the

relevant landscape character areas. In addition, paragraph 187 of the NPPF also states that decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, as well as recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.

Policy H11 of the Local Plan also concerns residential development in rural areas and states that unless the site is allocated for housing in the local plan or an exceptional justification can be made, housing in the rural area will be restricted to minor developments within the confines of the existing listed villages and settlements, this includes the village of High Halstow. The application scheme is for a major development which would be outside of the confines of an existing settlement and would be contrary to this policy.

However, it is acknowledged that the adopted Local Plan is of some age, being adopted in 2003, the Council does not currently have a five-year land supply (approximately 3 years), and as of the Housing Delivery Test Action Plan (2025), the Council had only delivered 72% of its target number of dwellings compared with the defined housing requirement as of December 2024. This is despite a significant increase in the number of homes delivered since 2020, compared with preceding years and indeed the highest levels of delivery Medway has had since its inception in 1998. These levels of delivery have generally been sustained until a sharp decline in net completions between 2024/2025 where only 634 homes were built below the target of 1,636 set by the government's standard method (Annual Monitoring Report, 2025). This means that an action plan should be prepared, a buffer of 20% should be applied to the local housing need and a presumption in favour of sustainable development applies.

The NPPF seeks to pursue sustainable development, (including countryside sites where appropriate), in a positive way through a presumption in favour of sustainable development, unless the policies within the NPPF provide clear reasons for refusing development, or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits (paragraph 11). Those elements of Policy BNE25 which seek to control the supply of land for housing are, therefore, considered to be out of date as the LPA cannot currently demonstrate a 5-year supply of deliverable housing land.

In terms of national policy, paragraph 61 of the NPPF seeks to significantly boost the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. Paragraph 72 of the NPPF also requires that local authorities should have a clear understanding of the land available in their area and from this, planning policies should identify a sufficient supply and mix of sites across the plan period. The NPPF also provides a narrative in terms of housing proposals in rural areas at paragraph 83, which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Paragraph 82 of the NPPF also requires that decisions should be responsive to local circumstances and support housing developments that reflect local needs.

Paragraph 110 of the NPPF states that the planning system should actively manage patterns of growth to address transport issues and that significant development should be focussed on locations which are, or can be made, sustainable. While this emphasises limiting the need to travel and offering genuine travel choices, it recognises that opportunities to maximise sustainable travel will vary between urban and rural areas.

Regulation 22 Medway Local Plan 2041

The Local Planning Authority is progressing the Medway Local Plan 2041 to replace the Medway Local Plan 2003. The preferred sites will allocate the amount of housing and commercial land required to meet the borough's up-to-date targets. The Regulation 22 Local Plan has provided for a housing need of 24,540 over the plan period, equating to 1,636 new homes per year. This is the Local Housing Needs requirement as defined through use of the government's standard method formula. The Local Plan provides for housing land supply through implementation of schemes with planning permission – 'pipeline' sites, new site allocations for development, and allowance for 'windfall' sites. The supply provided in the draft plan consists of: Pipeline sites (with planning consent, not completed or allocated) – 1,762; Local Plan allocations – 21,194; and Windfall sites – 1,584. This provides a small buffer on supply over need.

The Spatial Development Strategy sets out a 'brownfield first' approach, using previously developed land to bring forward opportunities for investment in urban centres. However, the development strategy recognises that greenfield sites also provide an important component of land supply, as the regeneration of brownfield sites will not meet the needs of all residents. It is also recognised that some of the brownfield sites could take longer to be developed, and this could impact on housing supply earlier in the plan period. A mix of lower density housing on the edges of Medway's towns and villages will, therefore, assist in providing for greater choice in the housing market. Around 30% of the plan's housing is, therefore, proposed to be directed to Medway's rural areas.

The site in question is allocated as a site (under ID HHH26) within the (Regulation 22) Medway Local Plan 2041 which could accommodate a large extension to the existing village of High Halstow. Policy SA9 sets out the objectives and criteria for this and requires that any development integrates with new and existing communities in the village, retains the identity of High Halstow, is landscape led and of high-quality design. The policy also requires that future development respond to local housing need, provides for key local services including a new 2FE primary school, supports improvement to public transport and contributes to delivering appropriate highways mitigation for extent of growth anticipated. Policy SA9 sets a yield of up to 760 new homes, with land uses comprising residential, education and community and commercial uses. With delivery expected in phases across the plan period, years 1-15. Including a projected delivery of 350 homes in the first 5 years of the plan period.

Prematurity

The issue of prematurity is a material planning consideration that should be

considered in the Planning Balance.

Paragraph 49 of the NPPF states

“Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

Paragraph 50 of the NPPF then goes on to consider prematurity:

“However, in the context of the Framework – an in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) The development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about scale, location or phasing of new development that are central to the emerging plan: and
- b) The emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”

Paragraph 51 of the NPPF further considers prematurity:

“Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan making process”.

The matter of prematurity will be considered further in the planning balance section at the end of this report.

In determining whether this proposal is acceptable, it is essential to consider the impact of the development on the wider landscape, habitat sites and/or designated sites, irreplaceable habitats such as ancient woodland, designated heritage assets, flood risk, matters of sustainability, and the various issues discussed under the relevant headings below. An assessment must then be made as to whether:

“Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in this

Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places, and providing affordable homes, individually or in combination.”

Accordingly, the planning application should be assessed against all relevant development plan and national policies before completing an overall assessment of impacts and benefits within the Planning Balance.

Loss of Agricultural Land

Paragraph 187(b) of the NPPF states that planning decisions should recognise ‘the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland’.

Natural England states that 'High quality agricultural land is valued because of its important contribution to food production, and it also offers much greater potential than poorer land for growing alternative fuel/energy crops'. Natural England observes that land protection policy 'is relevant to all planning applications, including those on smaller areas but it is for the planning authority to decide how significant are agricultural land issues ...'.

The application is accompanied with an Environmental Statement (ES), this includes a chapter which considers Agricultural Land Classification (ALC) following a survey of the site and soil characteristics undertaken by Reading Agricultural Consultants (Report ref; 9187, dated March 2023). Land, which is classified as Grades 1, 2 and 3a in the ALC system is defined as best and most versatile (BMV) agricultural land. Grade 2 is classified as very good quality agricultural land, with minor limitations which affect crop yield, cultivations or harvesting. Grade 3 land has moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield, and is subdivided into subgrade 3a (good quality land) and subgrade 3b (moderate quality land). The ALC outlines that there are three soil types present within the site, classified as a mix of grades 2, 3a and 3 and the areas of each grade are presented in the table below.

Grade	Description	Area (hectares)	Percentage
Grade 2	Very good quality	5.1	13%
Subgrade 3a	Good quality	25.2	62%
Subgrade 3b	Moderate quality	10.3	25%
Non-agricultural		0.1	0%
Total		40.7	100%

The proposed development would, therefore, result in the loss of approximately 40.6 hectares of agricultural land, which is largely classified as Subgrade 3a with a proportion of Subgrade 3b and Grade 2. The use of BMV land for development needs to be considered in the context of the need for the proposed development and the general high quality of agricultural land in the locality. In addition, and as the (Regulation 22) Medway Local Plan 2041 has demonstrated, through its proposed Spatial Development Strategy it is unlikely that the Council could meet its housing

land supply requirements without the loss of some agricultural land of Grade 3a or lower.

When considering, approx. 8,845 hectares of Medway's land is farmed the site would make up less than 1% of the total BMV land in Medway. Furthermore, and when balanced against the contribution that the site would make to housing delivery, this proposal would not amount to a significant loss of Grade 1 or Grade 2 agricultural land as the survey results in the table would demonstrate. Consequently, the proposal would not conflict with the principle that local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality (footnote 65) of the NPPF.

Landscape and Visual Impact

The application site is not within any nationally important landscape designations, and it is not identified within an area of local landscape importance as detailed within the proposal maps to the Local Plan. The nearest statutory designation, for nature conservation, is Northward Hill SSSI/High Halstow National Nature Reserve (NNR), located approximately 0.4km northwest of the site. In addition, the Fishers Wood Ancient Woodland abuts the site's eastern boundary, the implications of which are discussed under a separate heading.

Policy BNE25 of the Local Plan states that development in the countryside will only be permitted if it maintains, and where possible enhances the character, amenity and functioning of the countryside. The NPPF also sets out at paragraph 187 that planning decisions should protect and enhance valued landscapes and sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan) and contribute to and enhance the natural and local environment by recognising the intrinsic beauty of the countryside, and the wider benefits from natural capital and ecosystems. This is consistent with Policies S2 and S4 of the (Regulation 22) Medway Local Plan 2041 which also seeks to protect and enhance the natural environment and biodiversity including the natural beauty of the landscape.

The application site is located within the Hoo Peninsula Farmland character area as identified by the Medway Landscape Character Assessment (MLCA). The MLCA describes the characteristics of this character area as an undulating landscape gradually rising from the marshes in the east to form the central plateau of the Hoo Peninsula with an open exposed landscape of large-scale fields defined by grass margins and often sparse and poorly managed hedgerows. The landscape structure within the MLCA is described as generally weak, and the area lacks distinctiveness. It refers to the presence of pylons as significant vertical features in the open landscape which undermine the rural and tranquil landscape, although these detracting features are not a characteristic of the application site.

The existing open fields that make up the application site are not designated and are common features in the wider landscape. In their current use as fallow arable fields, they are of generally low biodiversity value. However, they exhibit scenic qualities as their openness is perceived from some locations within the local landscape, including from within and immediately adjacent to the site, as well as from other locations to

the north, east, south, and south-west. The field layout broadly follows the historic field pattern, where the original field boundaries are reflected by the existing drainage ditches and associated vegetation that cross the site. Overall, this landscape feature makes a positive contribution to the character and functioning of the landscape. However, the sense of tranquillity and remoteness experienced within the site is somewhat undermined by the proximity of High Halstow and resultant rural-urban fringe location, and the containment provided by the existing road network, including the A228 to the east. The existing commercial and residential development to the south-east of the site also detracts from the sense of rural character to a degree.

The MLCA seeks to maintain this sense of openness by resisting proposals for new development that would impact the open undeveloped quality of the landscape, and where development is proposed the siting, design and the use of locally characteristic planting to reduce any impacts should be considered through appropriate landscape mitigation. In addition, development proposals should seek to conserve the rural setting to Stoke, High Halstow, Hoo St Werburgh and Allhallows, and conserve the local distinctiveness of historic buildings and their rural setting.

Given the scale of the development proposed, and the fact that the site is currently undeveloped agricultural land, there would undoubtedly be a significant change to the landscape, which would be permanent. In this regard it is inevitable that there would be a high degree of landscape change within the site as the existing field would become a new housing estate. The scale of development, associated lighting, activity and change to the area would, therefore, have an adverse impact on the rural landscape within the site. It would also adversely affect the existing Public Rights of Way (PRoW) RS43 and RS44 as their current rural character would be lost and permanently changed as a result of the proposal. This would lead to a significant change in the experience for users of these routes.

A Landscape and Visual Impact Assessment (LVIA) has been submitted as part of the Environmental Statement (ES). The LVIA evaluates the likely significant effects of the proposed development on landscape character and visual amenity. Where appropriate, mitigation measures are identified to avoid, reduce, or offset any significant adverse effects and/or to enhance beneficial effects.

The assessment considers effects during three key stages:

- Construction phase;
- Year 1 of operation (the first year following full completion of the development);
- Year 15 of operation (when planting is assumed to be fully established).

Effects at Year 15 are regarded as the residual effects, representing those that remain after all mitigation measures have been implemented.

The visibility of the development was informed by an initial Zone of Theoretical Visibility mapping (ZTV), and a site visit which verified the initial findings on the extent of visibility. The LVIA identifies a total of 16 visual receptors with the potential to be affected by the proposed development as follows:

Visual Receptor	Location
SCP01	Pedestrian on PRow RS50
SCP02	Users of Dux Court Road (heading northeast towards High Halstow)
SCP03	Users of Christmas Lane
SCP04	Residents living in High Halstow (eastern edge) and users of PRow RS44
SCP05	Users of Britannia Road
SCP06	Users of Clinch Street (heading south towards Britannia Rd)
SCP07	Pedestrians of PRow RS31
SCP08	Pedestrians of PRow RS48
SCP09	Users of Sharnal Street
SCP10	Pedestrians and cyclists on the Heron Trail
SCP11	Users of Christmas Lane
SCP12	Residents and users of Newlands Farm
SCP13	Pedestrians on PRow RS43
SCP14	Pedestrians on PRow RS109 (heading southeast)
SCP15	Pedestrians on PRow RS109 (looking southwest)
SCP16	Pedestrians on PRow RS46

In addition, landscape receptors were also identified which includes components of the landscape that are likely to be affected by the proposed development, such as individual elements (hedges or buildings), aesthetic and perceptual characteristics (for example sense of naturalness, tranquillity or openness), or, at a larger scale, the character of a defined character area or landscape type. The landscape receptors selected includes existing agricultural fields, hedgerows, canopy trees, waterbodies and PRow network within the site as well as the NCA 113: North Kent Plain, Hoo Peninsula LCA, Hoo Peninsula Farmland LCA, Draft Hoo Landscape Sensitivity & Capacity Study (2019) and the sites character and its immediate surroundings.

The LVIA concludes that the proposed development will result in some significant adverse landscape and visual effects during the construction phase, with the level of adverse effect significance typically diminishing as the landscape proposals are completed and planting begins to become established. As a result of the loss of open land and the introduction of construction activities, the proposed development will give rise to significant (i.e. major or moderate) adverse effects on four landscape receptors and nine visual receptors as follows;

- Agricultural Fields & PRow RS44 – Major Adverse;
- Waterbodies – Moderate Adverse;
- ‘Land to the east of High Halstow’ – Moderate Adverse;
- The character of the Site and its immediate surroundings – Moderate Adverse;
- Residents of properties directly overlooking the Site – Major Adverse;
- Pedestrians on PRow RS31, RS43 and RS44 – Major Adverse;
- Users of Britannia Road and Clinch Street – Major Adverse; Users of Christmas Lane – Moderate to Major Adverse;
- Users of Heron Cycle Trail – Moderate Adverse; and
- Residents of Newlands Farm and users of Newlands Farm Road – Moderate Adverse.

Following completion, the proposed development will continue to result in some significant adverse landscape and visual effects, the majority of these will be experienced at Year 1, with the level of adverse effect significance typically

diminishing as the landscape proposals are completed and planting begins to become established. By Year 15, there will still be a loss of openness resulting from the introduction of the new built form, but the planting will have become established and will start to filter short-distance views and to break up the mass of the proposed development within medium and long-distance views. In addition, the new broadleaved woodland planting to the north-east of the site, adjacent the A228, will locally screen the impact of this road. No significant (i.e. major or moderate) adverse landscape residual effects will remain following establishment of the planting, and there will be residual beneficial effects that are significant for three receptors as follows:

- Hedgerows – Moderate Beneficial;
- Canopy Trees – Moderate Beneficial; and
- Waterbodies – Moderate Beneficial

Nonetheless, three visual receptors are predicted to experience significant adverse residual effects including residents of properties that directly overlook the site, and pedestrians using PROW RS43 and RS44.

In conclusion, the proposed development would erode the rural character of the immediate area by developing the open countryside to the east of High Halstow. This loss of countryside would be particularly apparent to users of the local PROW network and the nearby residential properties. Therefore, the proposed development would result in harm to the character and appearance of the area. Consequently, there would be conflict with Policy BNE25 of the Local Plan and paragraph 187(b) of the NPPF as the development would neither maintain nor enhance, the character, amenity and functioning of the countryside as it would introduce a permanent urbanising feature which would result in localised harm. However, when assessing the extent of this impact it is accepted that there will be harm arising from the development. That is almost unavoidable when open countryside is built on, however that does not, of itself, make the proposals unacceptable in planning terms as this must be weighed in context with the overall planning balance.

As detailed within the applicants supporting documents the scheme itself is also proposing mitigation measures to reduce the impact of the development on the wider landscape. A Landscape and Biodiversity Management Strategy has been prepared in order to ensure successful establishment of proposed soft landscape features and areas, and this strategy also sets out details of management proposals for existing features within the site including trees and hedgerows to secure their retention and enhancement. The Landscape strategy also sets out prescriptive long-term maintenance and management notes which are essentially a monitoring regime for the existing retained and proposed mitigation measures and features and provide corrective measures to ensure effectiveness of mitigation. Further details can be secured through the recommended conditions.

The application proposals will undoubtedly change the character and function of this existing greenfield site. The site will go from an undeveloped field to a residential estate. It must, therefore, be concluded that the application proposals will give rise to landscape harm and the harm caused by the proposed development to the area's landscape would be permanent. However, the housing proposed would make an

important contribution towards meeting Medway's acute housing needs and would thereby give rise to significant and important social and economic, benefits. In addition, the adverse effect of the loss of agricultural land and openness to residential development will be partly mitigated by the reinforcement and improvement of the landscape features that contribute to landscape character. This will improve the ecological and landscape functionality of the site and contribute to biodiversity net gain.

For the reasons as outlined above, the proposal would be contrary to Policy BNE25. It is also considered that it would fail to wholly comply with paragraph 187 of the NPPF. Notwithstanding this, and as referenced in the principle section of this report, the site in question is allocated as a site (under ID HHH26) within the (Regulation 22) Medway Local Plan 2041. In allocating this site this demonstrates the Councils direction of travel and vision in respect to delivering housing growth up to 2041. There is also an acceptance that in allocating this site and delivering the quantum of growth proposed on a greenfield site, this will undoubtedly result in landscape harm. The weight to be attached to these conclusions is set out in the planning balance section at the end of this report.

Impact on Ancient Woodland – Fishers Wood

Adjacent to the eastern site boundary is Fisher's Wood Ancient Woodland. The ES, chapter on Ecology states that this woodland comprises semi-mature Ash and occasional Oak, together with an understory limited to Elm and occasional Elder. The northern side of the woodland becomes progressively dominated by scrub including Eared Willow, Hawthorn and Elder, together with occasional Silver Birch. Ground flora is described as generally poor and dominated by ruderal species such as Common Nettle. Paragraph 193 of the NPPF identifies ancient woodland as an irreplaceable habitat. It further states that development resulting in loss or deterioration should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. This is consistent with Policy S2 and S5 of the (Regulation 22) Medway Local Plan 2041.

The application would not result in the direct loss of ancient woodland or the removal of any trees within it. The applicant has submitted an Ecology Mitigation and Creation Plan showing the extent of the buffers to the ancient woodland. Although the development parcels directly adjacent to this woodland form part of the outline application and, therefore, will be subject to further consideration at reserved matters stage, the indicative plan demonstrates that there would be a minimum buffer ranging from 15m – 21m buffer from the outer edge of the indicative development parcels to the ancient woodland. This would comply with Natural England's and the Forestry Commissions standing advice which stipulates a minimum 15m buffer. However, in line with the comments received from KCC Biodiversity, it is requested that the minimum width of the ancient woodland buffer zone be no less than 20 metres. As this area falls within the scope of the outline consent, a suitably worded planning condition is recommended to ensure that this minimum buffer is secured and appropriately detailed as part of future reserved matters submissions.

It is also proposed that the buffer zone would be fenced off to deter access. The buffer zone will also be planted with a semi natural habitat, including dense shrub

and grassland to not only function as a defensive barrier but improve the ecological functionality of the woodland edge. Further details of the proposed buffer and associated mitigation including defensive planting will be secured at reserved matters stage, when details for the siting and layout of the nearest residential properties are known. Extensive areas of open space will also be provided within the development providing embedded mitigation for indirect effects of off-site recreational disturbance.

A range of types of effect have the potential to occur with regard to Ancient Woodland, including direct effects (damage to woodland soil, and to trees and their roots), as well as indirect effects such as those resulting from changes to hydrology and changes to water quality, air and dust pollution, noise and lighting disturbance. Urbanisation effects may also result from unauthorised entry, resulting in recreational disturbance, trampling and eutrophication resulting from dog faeces.

In respect to recreational impacts any single visit to an ancient woodland by a member of the public for recreational purposes would give rise to some form of impact. That impact might be adverse. There is however no stated position in national policy or guidance that the public should be prohibited from accessing ancient woodland on that basis. Indeed, the Forestry Commission's 2010 practice guide, *Managing Ancient and Native Woodland in England (the Practice Guide)*, highlights the value of ancient woodland for recreation, and encourages the provision of permissive access. The *Planning Practice Guidance (PPG)* likewise identifies recreational opportunities in relation to green infrastructure, including woodland.

Insofar as the *Standing Advice* published by the Forestry Commission and Natural England includes impacts arising from public access amongst the ways in which deterioration can occur, the *Practice Guide* explains that almost all recreational activities can be a problem if carried out intensively. There is however no established threshold at which deterioration of ancient woodland can be held to occur. In relation to existing woodland condition, the *PPG* further indicates that this can usually be improved with good management. Balancing recreational use with conservation is clearly an important role of management. Given the above, public access to ancient woodland for recreational purposes cannot be considered possible in principle without some form of impact which logically falls short of 'deterioration'. Were this not the case then a simplistic linkage of impact with deterioration would form a basis to refuse any development which might lead to an additional visit.

In this case there is no existing public access into the ancient woodland, and it is proposed that the edge of the buffer zone is fenced off to restrict access. Natural England's and the Forestry Commissions *Standing Advice for Ancient Woodland* also includes changes to water table or drainage as being a potential impact. The Ancient Woodland (as far as can be observed from the outside), does not show the characteristics of woodland types that would be dependent on an elevated water table – i.e. wet wetland - with the Ancient Woodland appearing typical of a dry deciduous woodland. In addition, the *Flood Risk Assessment and Drainage Strategy* sets out proposals for a series of SuDS basins and drainage infrastructure which has been designed in accordance with industry standards to accommodate the surface water flows from the site in a controlled way. This can be designed to ensure the proposed development would not result in additional surface water flooding within

Fishers Wood, or changes to the existing water levels. As a result, changes to drainage or water tables will not result in deterioration of the ancient woodland.

With respect to the potential effect of domestic pets to species that the Ancient Woodland might support, there are no known species receptors with elevated importance within the Ancient Woodland, although a typical assemblage of common bird species typical of woodland habitat could be expected to be supported by the Ancient Woodland.

Potential air quality effects on the ancient woodland have also been assessed within the Air Quality chapter of the ES. Due to the proximity of the woodland to the A228 (Sharnal Street), there is expected to be an increase in the levels of traffic movements resulting from the development. Vegetation within woodland habitats may, therefore, be sensitive to the detrimental effects of air quality, primarily pollutants emitted in a gaseous form (such as NO_x), as well as those which have an impact through Nitrogen deposition.

Although there would be a predicted increase in NO_x concentrations, indicating that habitats within 10m of the roadside may experience changes which are greater than the screening threshold of 1%, when considering the likely effects of reduced air quality on woodland ecosystems, the ES advises that these results should be interpreted in light of the following:

- That the background critical levels/loads are currently exceeded, such that any additional increase is not expected to be reflected in a proportionate linear increase in effects;
- Only a small proportion of the total Ancient Woodland is within the zone of effect – 0.4ha of the woodland area (15.3%) with respect to NO_x and 0.2ha (7.7%) with respect to Nitrogen deposition;
- The existing condition of the woodland shows that ground flora is already dominated by nitrogen tolerant species, such as nettles;
- The level of change in Nitrogen deposition is well below that where research has shown that a decrease in species-richness is expected to occur. (Caporn et 2016, Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance);
- That owing to the density of the roadside scrub vegetation, these are likely to act as a physical barrier to the dispersal of vehicle pollutants into the woodland

As such, it is concluded that the minor additional increase in NO_x and Nitrogen-deposition is very unlikely to cause any significant measurable ecological effect to the ancient woodland, in the context of the elevated background levels. In addition, and following the implementation of the ancient woodland buffer zone (which are considered to be mitigation embedded within the design), it is considered that there will not be any effects to the ancient woodland during the operational phase.

Potentially significant effects on the ancient woodland during the construction phase have also been identified, largely as a result of potential encroachment of construction activities into the proposed buffer zones, dust deposition and surface

run-off of contaminants or silt. As such, it is proposed that standard mitigation measures are put in place during the construction phase to control matters relating to dust, potential contaminants, surface water run-off, chemical storage and tree protection. Furthermore, a number of general safeguarding measures will be implemented to protect faunal species. This includes minimising lighting spill, educating contractors on the presence of faunal species and minimising noise impacts. An appropriate condition is recommended.

In summary, the proposed application would not result in the direct loss of ancient woodland or the removal of any trees within it. Although introducing development, of the scale proposed, in close proximity to the woodland has the potential to increase the pressures placed upon it, the applicant has prepared measures to avoid any deterioration in the habitat from the increase in recreation. This includes defensive buffer planting to protect the woodland edges as well as fencing to prevent informal access. The use of signage has also been discussed to raise awareness of the wood's fragility and importance and what visitors/residents can do to help preserve this. Extensive areas of open space will also be provided within the development itself providing embedded mitigation for indirect effects of off-site recreational disturbance where dog walkers are also more likely to let their dog off the lead in the open environment elsewhere within the development where they can run freely and be observed. Moreover, the effects of the scheme need to be considered in the context that intensive arable agriculture would no longer take place to the north and west of the woodland, reducing the risk of chemical spray drift, eutrophication of the soils and fringe damage from root compaction and damage to branches. Although the Woodland Trust have sought a minimum 50m buffer to the Ancient Woodland the technical assessments and proposed mitigation submitted with the application demonstrate that a 20-metre buffer is adequate and proportionate, exceeding national minimum requirements.

In view of the above the proposal would not result in a deterioration of the ancient woodland subject to a package of mitigation and monitoring which can be secured by condition. Consequently, the application would adhere to the requirements set out in paragraph 193 of the NPPF and Policy S2 and S5 of the (Regulation 22) Medway Local Plan 2041.

Design and Layout

Policy BNE1 of the Local Plan states that the design of development should be appropriate in relation to the character, appearance and functioning of the built and natural environment and satisfactory in terms of scale, mass, proportion, details, and materials. Paragraphs 131 and 135 of the NPPF also emphasises the importance of good design. In particular, development should be visually attractive as a result of good architecture. Policy T1 of the (Regulation 22) Medway Local Plan 2041 requires that development shall be of high-quality design that makes a positive contribution and responds appropriately to the character and appearance of its surroundings. Policy SA9 of the (Regulation 22) Medway Local Plan 2041 also requires that the development of land east of High Halstow must be landscape-led and respond to the countryside setting and provide high quality green infrastructure that retains the rural character of the village. In addition, it should be of a high-quality

design and provide defined character areas that reflect variety in house types, layout, density and landscaping.

The site has previously been subject to two independent design reviews undertaken by Design Southeast prior to the submission of the application. The first of which took place in March 2021 and the second in February 2023. In addition, a series of design workshops also took place with design officers during the course of the application. The design and layout of the scheme has sought to respond to the key recommendations made by the design review panel. Most notably, reconsidering the location of the village centre and school so it is better connected to the existing village, giving further thought to how the variety of street patterns can contribute to defining the character areas and ensuring maximum connectivity and permeability through the site and adjacent land parcels.

Architecture

A building height parameter plan has been submitted with the application which sets out the site wide approach to the proposed building heights throughout the development. This sets out that the maximum building heights will range up to 2.5 storey's in some areas and up to 3 storey's in others.

Phase 1 complies with the building height parameter plan, with the majority of buildings set at 2 storeys, some at 2.5 storey's with key landmark buildings set at 3 storey's in height, to provide focus and appropriate spatial containment. The 2.5 – 3 storey buildings are located within or around the Village Centre and include 2 three storey apartment blocks with non-residential uses at ground floor level. Single storey garages and bungalows/chalet bungalows are also included to add balance.

Within Phase 1 the houses will have a traditional look reflecting Redrow's 'Heritage Range', using styles and materials that reflect the local character. However, different areas within the development will feature some variation to create interest, this includes a mix in house types and roof form. A core palette of materials is proposed with the dwellings comprising facing brickwork, render, timber cladding, hanging tiles and red and slate tone roofing materials. Contrasting materials and detailing will also be used to provide variation, particularly at key locations, to highlight junctions and accentuate subtle changes along the building line.

Overall, the dwellings submitted as part of the detailed phase have been well planned and given that the character and appearance of the surrounding area to the north and east has a mixed, suburban character the design is considered appropriate. To ensure the final design quality of the architecture is reflected on site, a condition is recommended to secure details of the external materials and the final architectural details relating to window frames and cills, doors, door frames and cills weatherboarding, fascias and soffits. Details for the design and appearance of the proposed residential units within the outline stage will be considered within the reserved matters submissions that will follow.

Layout, Landscaping and Open Space

The layout for Phase 1 comprises a main access point from Christmas Lane, as well as the Central Greenway adjacent to the school site which links to the existing settlement at High Halstow. The parcel contains open spaces and edge buffers which integrate with the overall open space proposals across the wider development. Vehicular access for Phase 1 would come via Christmas Lane with the network of roads and footpaths within the development following a hierarchy. The main street and entrance would feature a footway on both sides of the carriageway with a grass verge and street trees on both sides. The secondary streets and avenues would then feature a footway on a single side of the carriageway, with additional tree planting and visitor parking parallel to the road. The development will also be pulled back from the edge of the sites southern boundary in order to allow for new footpath connections along the side frontage and additional landscaping.

There would be a total of 4 different character areas within Phase 1 which would inform the various street typologies. This would consist of:

Village Centre (Character Area 1)

This area faces the main road through the site and is separated from it by wide green verges. It will have the highest housing density (around 50 homes per hectare) and a more urban feel, with terraced and semi-detached houses creating a street-facing character.

The Village (Character Area 2)

Located mainly along secondary roads, this area acts as a transition to the Village Fringe on the site's edge. Homes here are set back from the street with green verges and will have a medium density of about 35 homes per hectare.

The Mews (Character Area 3)

Found within the Village area, these are on quiet, no-through roads with green verges and street trees close to the road. This design slows traffic and creates a more enclosed, peaceful feel. The Mews contribute to the Village's overall density of around 35 homes per hectare.

Village Fringe (Character Area 4)

Wrapping around the southern and south-eastern edges of the site, this area provides a softer transition to open space and nearby roads. It will have the lowest density (about 25 homes per hectare) and a slightly more rural character.

Policy L4 of the Local Plan also encourages proposals which include new leisure and recreation facilities where they are adequate to meet the needs generated by new proposals. Open space, including play space, has been provided as detailed within the landscape masterplan with tree lined streets, as well as amenity green space, natural green space and SuDs features. Phase 1 will incorporate key open spaces including the Western Gateway (The Broad Walk), 'The Square' which is located within the Village Centre and 'The Meadow'. These areas of open space will incorporate native and ornamental planting, equipped play areas, SuDS features, parkland trees, native hedgerows, rain gardens, swales, seating and footpath connections. Further details of which will be secured by condition.

The Design Parameter Plans set out the key objectives for the scale of development, the distribution of development parcels, and the overarching approach to open space provision within the outline element of the scheme. The Open Space Parameter Plan indicates that the development will deliver approximately 14.06 hectares of open space across the site. This will comprise a mix of typologies, including parks and gardens, children's play areas, natural and semi-natural green space, amenity green space, and areas for allotments or community gardening. The plans also incorporate a network of Sustainable Drainage (SuDS) features, which are expected to include swales, rain gardens, ponds, attenuation basins, and permeable paving.

While the submitted parameter plans provide an indicative framework for how the wider development could be arranged, the outline elements will be subject to future reserved matters applications, through which detailed layout, scale, appearance, and landscaping will be finalised.

In addition, the applicant has suggested that a Multi-Use Games Area (MUGA) could be delivered within the proposed school site. This facility would be subject to a Community Use Agreement, ensuring public access outside school operating hours. Officers are satisfied that the school site provides sufficient space to accommodate a MUGA of an appropriate size, and that the detail can be appropriately secured and assessed at the reserved matters stage when the school layout is submitted.

Although Sport England has maintained an objection on the grounds of insufficient formal sports provision, the development would nevertheless deliver a substantial quantum of publicly accessible open space which would benefit both new and existing residents of High Halstow. In addition, a MUGA could be provided within the proposed school site, offering a purpose-designed, marked and equipped facility for organised sport, with secured community access through a Community Use Agreement. The scheme also includes flexible Class E and F floorspace within the village centre, which could accommodate indoor sport, recreation, or fitness uses. Furthermore, rather than duplicating existing provision, such as delivering another cricket pitch that may not be required, the applicant proposes to enhance existing formal sports facilities within the village through targeted financial contributions to the Parish Council.

Sport England has the ability to trigger a referral to the Secretary of State—often referred to as its “call-in” powers—when a local planning authority is minded to approve a development that conflicts with a Sport England objection. However, under the Town and Country Planning (Consultation) (England) Direction 2024, this power only applies where: (i) there is a deficiency in playing field provision within the local authority area; (ii) the proposed development would result in such a deficiency; or (iii) a playing field is to be lost and the proposed replacement would not match it in quantity, quality, or accessibility. In this case, the application site comprises an existing arable field and, therefore, does not constitute a playing field. As none of the conditions set out in the 2024 Direction are met, Sport England's referral powers would not be engaged in this instance.

In summary, the proposal is considered acceptable in terms of design, landscaping, open space and layout, and, subject to the recommended conditions, is judged to accord with Policy BNE1 of the Medway Local Plan, Policies SA9 and T1 of the

(Regulation 22) Medway Local Plan 2041, and the principles of good design set out within the NPPF.

Housing Mix and Affordable Housing

Policy H10 of the Local Plan supports a mix of house types and sizes suited to the needs of different people, including the elderly or persons with disabilities. Paragraph 61 of the NPPF also seeks to significantly boost the supply of homes and address the needs of groups with specific housing requirements. Policy H3 of the Local Plan also requires a proportion (minimum of 25%) of residential developments to be affordable housing where there is an identified need and where the development is of a substantial scale as defined within the Local Plan.

Policy T3 of the (Regulation 22) Medway Local Plan 2041 sets a higher threshold for the level of affordable housing required in high value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites. The policy requires 30% of all residential units proposed, to be delivered as affordable housing in these high value areas. In lower value areas the policy sets a lower threshold at 25% for greenfield sites. As per the Local Plan Viability Assessment (2025) Update, that has informed the evidence base for the new Local Plan, High Halstow was not ascribed a higher value site (para 4.53). This is on the basis of the sales values received for Redrow Homes', Heronden Grange scheme to the east of High Halstow. On this basis 25% affordable housing provision would be compliant with both the adopted Local Plan and the (Regulation 22) Medway Local Plan 2041.

Overall, the proposed development will provide a total of 190 affordable residential units (25% of total units). The provision of affordable housing will be split between all phases with the detailed element (Phase 1) delivering 68 affordable units providing a mix of 1, 2, 3 and 4 bed units. Overall Phase 1 offers a good mix in terms of size and type of affordable units particularly with more 2 beds and the inclusion of 3 and 4 bed units. A unit mix strategy identifying the provision of the remaining 122 affordable units will be secured at reserved matters stage. In addition, phase 1 generally provides a range and mix of dwelling types including bungalows and flats as well as houses.

In view of the above the proposal is, therefore, considered acceptable with regard to Policies H3 and H10 of the Local Plan, Policy T3 of the (Regulation 22) Medway Local Plan 2041 and paragraph 61 of the NPPF.

2 Form Entry Primary School

Policy SA9 of the (Regulation 22) Medway Local Plan 2041 requires the development to provide a new two-form entry (2FE) primary school, in accordance with the most recent Infrastructure Delivery Plan (IDP). The school is to be located adjacent to the new local centre and must benefit from clear, safe and attractive pedestrian links to the existing village. As identified on the submitted plans, Phase 1b will include the land required for the 2FE primary school. This land will be prepared as part of Phase 1 but will sit within the outline planning component of the application. While Redrow will not be responsible for delivering the school itself, they have committed to incorporating the school land within the application boundary,

preparing and transferring the land, and agreeing to the necessary Section 106 contributions to support its future delivery. The primary school will subsequently come forward under a separate Reserved Matters Application, led by the appropriate education delivery body in collaboration with the Council.

The delivery of the new primary school will provide approximately 420 primary school places. Of these, 210 will be net additional places, with the remaining 210 reflecting the existing capacity of High Halstow Primary Academy, which will relocate to the new school once it becomes operational. Upon completion, the new primary school will accommodate all of the primary-age pupil demand generated by the existing village and the proposed development (194 places), leaving a surplus of 16 places available to serve the wider local area. Following discussions with Medway Council School Services, it is anticipated that the proposed school will require approximately one year to complete its detailed design and secure approval through a future reserved matters application, followed by a further two-year construction period. The timing and delivery requirements for the school will be secured through the Section 106 agreement, which will ensure that the land is transferred, suitable access to the site is provided, and necessary utilities and services are delivered to the school boundary to enable construction to proceed. It is envisaged that the new school will be completed and operational prior to the occupation of the 200th dwelling. This would be an acceptable position for School Services.

When the new primary school is constructed, all pupils from the existing High Halstow Primary School will transfer to the new facility, rendering the current school site surplus to requirements. The capital receipt generated from the sale of the existing school site will be used to support the delivery of additional secondary provision on the Hoo Peninsula. The Leigh Academy Trust, which operates High Halstow Primary School, holds the freehold for the existing site. The arrangements relating to the transfer of pupils, disposal of the existing school site, and reinvestment of the receipt will be secured through a separate agreement between Medway School Services and The Leigh Academy Trust.

The new school site is strategically positioned close to the existing village and the Public Rights of Way network, enabling strong integration with both established and new communities. Within the wider development, the school is located to the east of the Local Centre, ensuring accessibility, walkability, and a central role in the emerging neighbourhood structure.

It is also proposed that a Multi-Use Games Area ('MUGA') will be located within the proposed grounds of the Primary School and will be designed to be used by both the school pupils, as well as the local community. This provision has been discussed with Medway Education Officers and is a strategy which has been successfully delivered on school sites elsewhere.

Local Centre

Within Phase 1, the Proposed Development incorporates flexible non-residential uses at ground-floor level within the apartment blocks fronting the central Square and the school, helping to establish an active frontage and provide easily accessible

community facilities. The application seeks permission for flexible commercial and community floorspace (Use Class E and/or F).

The Local Centre will function as a mixed-use hub accommodating uses within Classes E and/or F, with the final mix to be agreed with Medway Council, the Parish Council, and local residents at the detailed design stage. It is envisaged that the Local Centre could include:

- A single large unit suitable for a local convenience / grocery store;
- Additional units capable of accommodating separate retail outlets;
- A community hub, potentially including flexible office or co-working space; and
- Community services, such as a pharmacy.

The scheme includes appropriate parking provision to serve the proposed uses. A planning condition will also be applied requiring the submission and approval of detailed information relating to the proposed commercial floorspace.

Amenity

There are two main amenity considerations, firstly the impact of the proposed development on neighbours and secondly the living conditions which would be created for potential occupants of the development itself. Policy BNE2 of the Local Plan, Policy T1 of the (Regulation 22) Medway Local Plan 2041 and paragraph 135 of the NPPF relates to the protection of these amenities.

Neighbouring Amenity

In respect to the detailed application (Phase 1) and given the arrangement of the proposed dwellings within the site, their distance from the nearest dwellings to the West (Leaman Close, Holmes Close, Mackintosh Close, and Cardigan Close) which equate to circa 30m between the rear elevations of these existing properties and the principal elevations of the proposed 2 storey dwellings, as well as the proposed landscape buffer running along the western boundary, which would include tree planting to screen views of the development, there would be no detrimental impact to neighbouring amenity with regard to loss of daylight, outlook, privacy and overshadowing. Similarly, and given the intervening distance between the nearest dwellings and the existing properties fronting Christmas Lane, there would be no unacceptable impacts on these properties either.

The land reserved for the 2FE Primary School is located along the western boundary of the site, adjacent to existing properties on Mackintosh Close and Half Moon Way. Due to its proximity to these dwellings, the reserved matters application for the school will need to carefully consider the positioning of the school building and the Multi-Use Games Area (MUGA). Given the parcel's location next to the Village Centre, it is anticipated that the school will front onto the central open space, 'The Square,' to reinforce the site's overall placemaking strategy. The MUGA will be positioned close to the school building to ensure amenity impacts are directed away from existing properties.

As set out in the noise section of this report, a condition will require a detailed assessment of potential noise impacts from the MUGA, alongside controls for plant noise and extraction systems. This assessment will inform any necessary mitigation to protect the amenity of both existing residents and future occupiers adjoining the school's southern and western boundary. The school playing fields will provide adequate separation distances to minimise overlooking, and buffer planting can be secured at the reserved matters stage to further reduce visual impacts and maintain a sense of privacy for the existing village.

It is acknowledged that existing residents along the western boundary will experience a loss of view due to the introduction of built form into what is currently an open expanse of arable fields. However, loss of view is not considered a material planning consideration. While intrusion will occur during construction and as the development emerges, over time the scheme has the potential to integrate new and existing communities together, and will provide a new school, open space and a village centre which will also serve the existing village. Overall, the proposed separation distances, combined with the landscape buffer along the western boundary of Phase 1, will ensure that the closest private residences maintain an acceptable level of amenity.

Although the detailed layout of dwellings within the outline element will be subject to further consideration at the reserved matters stage, it has been demonstrated through the parameter plans that sufficient buffers and separation distances can be achieved to safeguard the amenity of existing properties to the east and south. This will be assessed in detail as part of future reserved matters submissions. However, the construction of the development itself would lead to noise and dust emissions to nearby residential properties and the ancient woodland. It is, therefore, recommended that a condition is imposed requiring a Construction Environmental Management Plan (CEMP). This should clearly set out the measures that would be put in place during construction to mitigate this.

Future Occupiers Amenity

With regard to the amenities of the future occupiers, the proposed dwellings within Phase 1 have been considered against the Technical housing standards - nationally described space standard dated March 2015.

All dwellings would either meet or exceed the nationally described space standards and all habitable rooms would be provided with suitable outlook. Private amenity space is also provided in the form of private gardens for the houses and balconies for the apartments which would be compliant with the guidance as set out in the Medway Housing Design Standards.

Given the back to back arrangement of many of the properties and when also taking account of the rural nature of the site where further development and the intensification of units could alter the visual amenity of the development, have direct implications on neighbouring amenity and could also have wider implications in terms of traffic generation, particularly if this resulted in the creation of additional bedrooms, while also protecting the retention of bungalows to meet specific housing needs, it is recommended that householder permitted development rights are

removed with regard to Classes AA, B, D, E, F and G. It is also recommended that permitted development rights are removed with regard to the change of use from Class C3 dwellinghouse to Class C4 small HMO in the interest of amenity given the prevailing character of the area and its location.

Within the outline element, details such as the proximity to neighbouring properties, rear garden amenity, housing sizes, privacy, and plot layout are not specified at this stage. These matters will be fully assessed at the reserved matters stage. As with Phase 1, all dwellings will be required to comply with the Government's Technical Housing Standards (2015) and provide sufficient private outdoor amenity space in accordance with the Medway Housing Design Standards.

Subject to the recommended conditions being imposed, no objections are raised in terms of the impact on amenities of both the future occupiers and neighbours. The proposal is considered to comply with Policy BNE2 of the Local Plan, Policy T1 of the (Regulation 22) Medway Local Plan 2041 and paragraph 135 of the NPPF.

Noise

The applicant has submitted a chapter within the Environmental Statement (ES) addressing noise impacts. This includes a Noise Impact Assessment, which involved undertaking an environmental baseline noise survey to establish the existing noise climate and character in and around the proposed development site. The assessments have been undertaken in accordance with principles and guidance set out in relevant British Standards and industry best practice and the proposed development has been assessed for potential noise impacts across Phase 1 (detailed planning application) and the subsequent outline phases.

For the residential use, the majority of the proposed buildings fall into a 'Low' risk category with the buildings closest to Christmas Lane falling into a 'Medium' risk category when assessed in accordance with the ANC 'Acoustics, Ventilation and Overheating' guidance. Night-time noise levels are relatively low and indicate that the potential for natural ventilation through openable windows to combat overheating is possible for the majority of the site, subject to the external maximum noise levels. Night-time noise levels exceed the guidance levels stated in the guidance for the buildings within 75m of Christmas Lane and 200m of the A228 Sharnal Street. Operational traffic noise levels have been predicted to result in only a small increase compared to the future baseline, with the worst-case scenario being a 1.4dB rise, an increase that would not be perceptible. These changes are, therefore, considered insignificant. While the specific impact from road traffic noise, and noise from Coach Barn Kennels on the proposed residential properties does not appear to have been assessed in detail, this can be addressed through an appropriate planning condition which will then inform the relevant mitigation if required.

Commercial, healthcare, and education uses proposed at the centre of the site are considered suitable for natural ventilation via openable windows. Although forming part of the outline element, a Multi-Use Games Area (MUGA) is proposed within the school site. The noise assessment indicates that the MUGA could significantly increase noise levels at nearby residential properties. It is, therefore, recommended that this be subject to further detailed assessment at the design stage, with an

appropriate planning condition applied. Similarly, plant noise from the school and commercial premises, including extraction and treatment of cooking fumes (where applicable) and other mechanical plant, can also be controlled by recommended conditions.

The noise assessment has also considered potential impacts of construction noise on sensitive receptors. None of the proposed assessment criteria are predicted to be exceeded; however, this conclusion is based on several assumptions, including the provision of a 2.4m high site hoarding to act as a noise barrier. At this stage, it is not possible to accurately assess vibration levels, as these will depend on factors that are currently unknown, including proposed construction methods i.e.; piling. The majority of construction-related noise and vibration issues can be managed through the implementation of a Construction Environmental Management Plan (CEMP).

Subject to the conditions as outlined above as well as further details of the proposed sound insulation between the floor and ceilings of adjacent flats units to ensure acceptable noise levels are maintained, the proposal is considered to be in accordance with Policy BNE2 of the Local Plan, Policy DM4 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 187 and 198 of the NPPF.

Air Quality

Due to the size and nature of the proposed development, and in accordance with the requirements as set out in Medway Councils Air Quality Planning Guidance, the applicant has submitted a chapter within the ES which considers the impacts of Air Quality. This includes an assessment of the impact of dust during construction from the proposed development and exhaust emissions from machinery and vehicles on human health and ecological receptors. The screening criteria for development located near or within an Air Quality Management Area (AQMA) were applied to the Four Elms Hill AQMA. The projected increases in both Heavy-Duty Vehicle (HDV) and Light Duty Vehicle (LDV) flows associated with the proposed development exceed the relevant thresholds. As a result, detailed dispersion modelling of road-traffic emissions in the vicinity of the site and the Four Elms Hill AQMA was required.

The report concludes that providing that there are suitable mitigation measures and good site practice throughout the construction phase, the residual effects on air quality will be insignificant. Full details of the mitigation will be provided as part of a site wide construction management plan as a condition of the approval. Operational impacts with the development completed have also been modelled and have been determined to be insignificant. An emissions mitigation statement has also been undertaken which will form the basis of determining the scope and scale of the mitigation. Further details of which will be secured by condition.

In view of the above, and subject to a condition requiring the submission of an Air Quality Emissions Mitigation Statement giving full details of the measures that will be implemented as part of the development with regards to road transport emissions, as well as further details of dust control measures, no objection is raised with regards to Policy BNE24 of the Local Plan, Policy DM3 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 187 and 199 of the NPPF.

Contamination

The application has been submitted with a Contamination Desk Top Study and Preliminary/Overview Site Investigation Report (Ref; J14231). The report is in line with current guidance. On the basis of the investigations and contamination laboratory testing undertaken no elevated contaminant concentrations have been measured and, therefore, the soils are considered suitable to remain on site. It is, therefore, accepted that based on the results of the report, full land contamination conditions are not necessary. However, as the proposed development is considered sensitive, as it is principally a residential development, it is recommended that a watching brief condition is secured in the event that unexpected contamination is uncovered during construction.

An Unexploded Ordnance (UXO) Risk Assessment (Ref: DA10201-00) has also been undertaken in support of the application. The assessment found no evidence of former military occupation or usage of the site that could have resulted in contamination by Allied ordnance, such as LSA (Large Shell Ammunition) or SAA (Small Arms Ammunition). However, the conditions under which HAA (Heavy Anti-Aircraft) or LAA (Light Anti-Aircraft) projectiles may have fallen unnoticed within the site boundary are considered comparable to those associated with aerial-delivered ordnance. The UXO Risk Assessment recommends a number of risk mitigation measures to be implemented during construction, including the preparation of a UXO Risk Management Plan detailing procedures for dealing with UXO if encountered, contractor briefings on basic UXO identification, and monitoring during excavation and piling works where necessary.

Subject to the aforementioned contamination condition and a condition requiring a UXO Risk Management Plan to be produced in accordance with the recommendations set out in the UXO Risk Assessment, the development would comply with Policy BNE23 of the Local Plan, Policy DM2 of the (Regulation 22) Medway Local Plan 2041, and paragraphs 196–197 of the NPPF.

Flooding and Drainage

A Flood Risk Assessment (FRA) (Ref; BRM-ARP-ZZ-XX-RP-CD-0002, Issue 2, dated June 2025) has been prepared in support of the application. The FRA investigates flood risk on the site and the surrounding area and outlines the mitigation measures proposed to ensure the sustainable and safe development of the site. The FRA considers the flood risk to the proposed development from various sources, such as fluvial, sewers, groundwater, reservoirs, drains, ditches and overland flow.

The site lies wholly within Flood Zone 1, which is defined as land having less than a 1 in 1,000 annual probability of river or sea flooding. The nearest main river is the River Medway, located approximately 2.2 km to the northwest. The risk of flooding from fluvial or tidal sources is, therefore, considered low/negligible. Groundwater flood risk is assessed as low with standard mitigation measures, and medium-low during construction due to the potential presence of perched water. Residual mitigation for groundwater flooding during construction includes additional stabilisation of excavations, the use of de-watering equipment, and the disposal of

groundwater removed from excavations to the foul water drainage system. This will also include the implementation of a construction surface water management plan which will be secured by condition.

Environment Agency mapping confirms that the site is not within an area susceptible to reservoir flooding, and there are no significant artificial sources nearby, meaning the risk from artificial sources is low. Surface water flood risk across the majority of the site is very low. However, mapping indicates some areas of potential flooding in the northwest of the site and along Britannia Road, with risks ranging from low (1 in 100 to 1 in 1,000 annual probability) to high (1 in 30 or greater annual probability). Development has largely avoided extending into these medium- to high-risk zones. Based on this evidence and acknowledging that the proposals include a new surface water management strategy, the overall risk from pluvial flooding and overland flow is considered low. There are currently no existing public foul or surface water drainage assets within the site boundary and, therefore, the risk of sewer flooding is also low.

The proposed drainage strategy has applied the restriction of 2l/s/ha for all storm events up to and including the 1 in 100-year return period +40% climate change. A detailed appraisal of SuDS as advocated by CIRIA C753 'The SuDS Manual' has been undertaken alongside an assessment of the required attenuation on site to accommodate all storm events up to and including the 1 in 100-year event plus 40% allowance for climate change. The proposed SuDS and attenuation features will minimise discharge from the site to alleviate off site flood risk/surcharging and ensure that surface water within the development is managed to appropriate levels.

The site presents an opportunity to incorporate a range of Sustainable Drainage Systems (SuDS) through a holistic and integrated approach. The rural setting and scale of the development lend themselves to above-ground "greener" drainage solutions, which not only provide water treatment benefits but also enhance biodiversity and amenity value. It is proposed that the on-site attenuation requirements will be met through a combination of lined permeable paving, swales, landscaped bio-retention areas, and wet ponds with restricted outfall.

The foul water strategy proposes that flows will be collected and conveyed to a single pump station located at the north-eastern boundary of the site, fronting Britannia Road. This pump station will discharge via a rising main to the nearest point of connection in High Halstow, to the northwest of the site. The system will be designed and constructed in accordance with the latest Sewerage Sector Guidance to enable adoption by Southern Water. Consultation with Southern Water has confirmed that there is currently inadequate capacity at the nearest point of connection, and, therefore, off-site reinforcement will be required to accommodate flows from the development in consultation with Southern Water.

On the basis of the minimal risk of flooding and proposed SuDS, it is considered that the proposed development accords with flooding and drainage policy requirements. In view of the above, and subject to conditions, requiring the submission of further details with respect to a sustainable drainage scheme, the temporary management of surface water throughout the construction phase and a signed verification report confirming the agreed surface water system has been constructed as per the agreed

scheme the proposal is in accordance with Policy CF13 of the Local Plan, Policy DM1 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 181 and 182 of the NPPF.

Heritage

An assessment of built heritage has been undertaken as part of the ES (Chapter 6), in accordance with Policies BNE18 of the Local Plan, Policy S8 of the (Regulation 22) Medway Local Plan 2041, and paragraph 207 of the NPPF. The assessment considers designated and non-designated heritage assets within a 600m radius of the site and evaluates the extent to which the proposal affects their significance and settings.

The site contains no heritage assets (either designated or non-designated). Within the wider area, three listed buildings, Church of St Margaret (Grade I), Fenn Street Farmhouse (Grade II) and The Red Dog Public House (Grade II) and several non-designated assets, including Jackson's Farm, Farmstead North of Walnut Tree and Hoo Junction & Port Victoria Railway, have been assessed. Due to limited or no intervisibility between the development and the listed buildings, impacts during construction and operation are assessed as negligible to minor and neutral, and the significance of these assets would be preserved.

For the non-designated assets located further from the site, including the Farmstead North of Walnut Tree and Hoo Junction & Port Victoria Railway, existing landscape screening and reduced intervisibility mean the proposed development would not materially alter the appreciation of their heritage significance. Changes to their wider settings would be limited to general alterations to the rural landscape as a result of development of the site.

A minor adverse effect is identified for Jackson's Farm, arising from some erosion of the wider rural character of its setting and the farmstead's relatively close proximity to the site. However, this effect is not considered significant, as it relates only to a partial change within the wider rural setting and is mitigated through the contextual design of the scheme. In line with the NPPF, this represents a low level of less-than-substantial harm to a non-designated heritage asset, which is outweighed by the wider public benefits of the scheme, including the delivery of housing, a new school and open space. In addition, woodland planting, green buffers, height controls and the use of locally appropriate materials help ensure the development respects local character and complies with Policies BNE1, BNE18 of the Local Plan, Policy S8 of the (Regulation 22) Medway Local Plan 2041, and Section 16 of the NPPF. Overall, the proposal is considered acceptable in heritage terms.

Archaeology

The application is accompanied with an ES, this includes a chapter which considers the impacts on heritage assets of archaeological interest. The preparation of the ES has been informed by various studies, comprising an archaeological desk-based assessment (RPS Version 2 dated March 2021), followed by geophysical (detailed magnetic) survey (report by Sumo dated March 2021), in turn followed by targeted archaeological trial trenching (report by Wessex Archaeology (August 2021 and

updated March 2023). KCC Archaeology are satisfied that this provides an appropriate and proportionate response to assess the significance of any heritage assets affected in line with the requirements of paragraph 207 of the NPPF.

The Environmental Statement (ES) sets out proposals for mitigation works to offset potential harm arising from the development. These measures have been formulated in consultation with KCC Heritage Conservation. The ES recommends that further archaeological evaluation is required, including the excavation of machine-cut trial trenches across untrenched areas of the site, supplemented by test pits to sample Pleistocene deposits and assess the site's Palaeolithic potential. The ES advises that this evaluation can be undertaken post-determination, secured by condition.

Following the additional field evaluation, the ES proposes that a strategy for the investigation or avoidance of archaeological remains will be agreed. For remains already identified during the initial evaluation, the ES recommends excavation areas (Figures 5.1 to 5.3), while acknowledging that these areas may expand following post-consent evaluation. These works can be secured by condition, with all phases of archaeological work undertaken in accordance with Written Schemes of Investigation (WSIs) submitted to and approved by the Local Planning Authority in advance.

The approach outlined within the Environmental Statement (ES) is considered acceptable, and the archaeological potential of the site has been sufficiently investigated. Subject to conditions requiring an archaeological field evaluation and the submission of a post-excavation assessment report, the proposal is considered to accord with Policy BNE21 of the Local Plan, Policy DM9 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 207–212 of the NPPF.

Ecology

No statutory nature conservation designations are located within or adjacent to the site. The nearest statutory designation is Northward Hill Site of Special Scientific Interest (SSSI), which is also subject to designation as High Halstow National Nature Reserve (NNR), located approximately 400m to the northwest of the site. This SSSI is designated on the basis supporting the largest Heronry in Britain along with a diverse bird and invertebrate assemblage, whilst the NNR is designated on the basis of supporting a complex mosaic of scrub and woodland habitat.

The nearest international designation is South Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar located approximately 1.6km northwest and designated on the basis of supporting internationally important assemblages of wetland birds. There are also several parcels of ancient semi-natural and ancient replanted woodland in the area surrounding the site. Fisher's Wood is adjacent to the eastern site boundary and comprises Ancient and Semi-Natural Woodland. The impacts of the development on the Ancient Woodland are considered earlier in this report.

The application is accompanied with an ES, this includes a chapter on Ecology. An Updated Baseline Ecological Appraisal (April 2025) and Ecology Technical Note (Ref:5403-15) has also been prepared which has been submitted and updated as

part of the ES. The site was surveyed in July 2018, January 2020, May 2022 and January 2025 in order to ascertain the general ecological value of the land contained within the boundaries of the site and to identify the main habitats and ecological features present. The 2025 surveys were also undertaken to confirm that the findings of the initial surveys undertaken in May 2022 remain valid for decision-making, due to the time lapsed. Additional wintering bird surveys have been completed during the period October 2024 to March 2025 to inform the assessment of effects on this species group.

General faunal activity, such as mammals or birds observed visually or by call during the course of the surveys was recorded. Particular attention was also paid to the potential presence of any protected, rare or notable species, with specific survey work undertaken in respect of Bats, Badgers, Water Voles, Otters, Great Crested Newts, reptiles and breeding birds.

Bats

Survey work was undertaken at the site between June - September 2018, July 2018 - May 2019 and June – August 2022. Trees were assessed for their suitability to support roosting bats based on the presence of features such as holes, cracks, splits or loose bark. Ground level tree assessments, nighttime bat walkover surveys and automated static bat detectors were also carried out as part of the assessment.

Fisher's Wood is located adjacent to the eastern site boundary and was recorded to support several trees with bat roosting potential, including a number along the edge of the woodland adjacent to the site. Given this is located offsite a thorough survey of this wood was not undertaken, and as such a precautionary assessment of moderate-high bat roosting potential is allocated to this woodland as a group. The trees identified at the application site are considered to support low bat roosting potential and are not considered to form an important ecological feature beyond the site level. The former arable field that dominates the site supports limited floral diversity being dominated by recolonising, ruderal vegetation. As such much of the site is considered to be of limited value to foraging bats. However, the hedgerows, trees, ditches and the adjacent pond offer potential opportunities for foraging bats.

Generally, low levels of activity were recorded in terms of foraging and commuting bats, with at least six species (or species groups) recorded during the surveys. Common Pipistrelle and 'Big Bat' species were most frequently recorded, with foraging individuals of both species recorded during the manual activity surveys undertaken. Records of Soprano Pipistrelle and Myotis spp., along with occasional Long-eared bat sp. and Nathusius' Pipistrelle, were also recorded, although the survey results indicate that the site is unlikely to be of high importance for these species.

In terms of habitats, areas of potential value to foraging and commuting bats are mostly associated with the corridor habitats such as the boundary hedgerows and the ditches and near the offsite pond adjacent to the northwestern boundary. The arable habitat which dominates the site appears to be of little value, whilst the boundaries of the site which are not formed by continuous vegetated corridors, such as the eastern site boundary, were found to be used relatively infrequently by bats.

Taking into account that the site is dominated by arable habitat, which is of relatively low value for bats, it is considered that overall, the population of bats associated with the site is of importance at the local level only.

Badgers

Detailed badger surveys were carried out in July 2018, January 2020, May 2022 and January 2025. The surveys comprised two main elements. The first element involved searching for evidence of badger setts, the second element involved searching for signs of badger activity such as well-worn paths and push-throughs, snagged hair, footprints, latrines and foraging signs.

No evidence of badgers was recorded during the initial 2018 survey at the site, albeit dense scrub was present along much of the ditch network obscuring its view. During the 2020 survey a single entrance active sett was recorded in the middle of the site and was considered to be either a newly excavated sett, or one which had become abandoned. During the updated Badger survey conducted in May 2022, the sett entrance was recorded to be disused. In addition to this, the most recent site walkover survey found the entrance to be in a similar use of disuse, clearly unused for a prolonged period of time.

As such, based on the presence of a single disused outlier badger sett, it is considered that the site is likely to be of low value to badgers and accordingly, badgers are not considered to form an important ecological feature at the local level.

Water Voles and Otters

The ditches holding water and which were considered to be suitable for water voles and otters, mainly those in the west and at the northern site boundary, along with the connecting ditches were thoroughly searched for signs of Water Vole and Otter.

In 2018 it was considered that the ditches comprised suboptimal habitat for water vole given their dry condition along with the very high dense scrub cover over much of their extent. Potential for water vole was considered to be negligible. Scrub clearance was subsequently undertaken prior to the January 2020 Phase 1 survey and an updated water vole survey conducted, with a further detailed search undertaken in June 2020.

Evidence of water vole was found at the eastern extent of the northern ditch (D10) with latrines, feeding stations/feeding remains and burrows recorded, whilst no evidence for this species was recorded elsewhere on site. As such it is considered that Water Vole were, at one time, making use of the eastern extent of this ditch, albeit it supports relatively low water levels, and activity may vary seasonally if the ditch dries out during later summer months. Update survey work of ditch D10 was undertaken at the site in May and October 2022. Scrub was found to have colonised ditch D10 again and no evidence of Water Voles was found on site. No evidence for other riparian fauna (such as Otter or American Mink) has been recorded at the site.

As such, it is considered that the water vole population is transient and highly unstable, susceptible to temporal and environmental conditions, impacting

population size and range fluctuations. On the basis of the findings of the most recent 2022 survey, the population of water vole at the site is considered to be of a local level importance only.

Dormice, Hedgehogs and other small Mammals

The site is considered to be largely unsuitable for dormice being dominated by temporary pasture fields. Whilst suitable habitat is present in the form of the offsite woodland adjacent to the eastern boundary, the hedgerow network at the site is very gappy, and as such continuous habitat suitable for this species is not considered to be present beyond the immediate vicinity of this woodland.

No evidence of any other protected mammal species was recorded within the site. The site provides some potential for Harvest Mouse, Hedgehog and Brown Hare, which are listed as species of principal importance. Given previous background records of these species from the surrounding area, it is possible that these species make some use of the site. These species remain relatively common and widespread in England, whilst abundant similar habitats of suitability for these species are located in the surrounds of the site.

Amphibians/Great Crested Newts

Ponds within the nearby surrounds of the site were identified based on OS mapping. These were then subject to an initial assessment based on aerial photography and a visual inspection (where access was available) to determine if specific survey work was required, considering likely suitability to support Great Crested Newts, connectivity and distance to the Site, and presence of any potential dispersal barriers.

No waterbodies are present within the site boundary however ponds within 250m of the site were considered to provide potential habitat for breeding amphibians, including Great Crested Newt. Therefore, specific survey work to establish the presence/absence of Great Crested Newts and other amphibian species was undertaken in 2018.

Following additional survey work in 2020, two of the ponds (P1 and P2) appeared to support a population of Great Crested Newt, although it is considered that the population is small. Given the proximity of the ponds to the site (with Pond P1 located approximately 25m to the north of the Site), it is expected that this species could utilise suitable terrestrial habitat associated with the grassy margins of the fields in the north-west part of the site, and the associated hedgerows and ditches. However, the majority of the habitats within the site are suboptimal and it is considered more likely that this species would be part of a more northerly located metapopulation focussed on pond P1 and P2 and potentially further ponds beyond this.

As such, this species is considered to be an important ecological feature, although on the basis of the likely very small numbers present, it is considered the site is of no more than low ecological value at the local level to this species. In addition, and once the embedded mitigation has been taken into account (secured through a Natural

England licence), operational effects that are likely to result from habitat loss from Great Crested Newt, are considered to be negligible and non-significant.

Reptiles

Given the presence of potentially suitable reptile habitat within the site, specific surveys were undertaken to establish the presence/absence of common reptile species. Surveys were undertaken between May and June 2019. Update surveys were then undertaken throughout June, July and August 2022.

In 2019 a peak count of 102 adult Common Lizard was recorded during the survey work, with no other reptile species recorded. An updated reptile survey was then conducted through July and August 2022 due to the continued presence of potential reptile habitat within the site and wider area and a prolonged period of time passing since the previous survey having been undertaken.

Much lower numbers of reptiles were found during the 2022 reptile surveys. A peak count of two Adult Common lizards were recorded during the survey work at the site, on the 2nd and the 6th visit, with an adult and juvenile found along transect B, to the southeast of the site. The areas of suitable reptile habitat at the site are limited to the field margins and, therefore, any local populations are considered to be low under the standard guidance. The decline in the number of reptiles recorded in 2022, in comparison to 2019, is likely to be due to changes in agricultural management practices. As such, it is considered that the population of reptiles supported by the study area is of importance at the local level only.

As part of the proposed development, additional reptile habitat will be created within a bespoke reptile creation area in the northern part of the site (0.16ha in size), together with extensive proposed green corridors and retained woodland buffer zones, which where suitable will be managed to include scrub and grassland to ensure that suitable conditions are in place for reptile species. Further details of which will be secured by condition.

Breeding and Wintering Birds

The use of the site by breeding birds was assessed over four survey visits, (on separate days) in May and June 2020 and a further single survey in June 2022 (to provide an update due to the changes in habitats which had occurred). Wintering bird surveys were also conducted at the site throughout the 2022/2023 wintering bird survey season, with monthly visits between October 2022 and February 2023. A further suite of Wintering bird surveys was conducted at the site for the 2024/2025 wintering bird survey season, with bimonthly visits being undertaken between November 2024 and February 2025.

A total of 34 species were recorded within the site boundary during the 2020 breeding bird survey, with 16 species considered to be breeding / probably breeding onsite. All species recorded to be breeding, probably breeding or possibly breeding were considered to be relatively common and widespread at both a national and local level, and the majority have no particular conservation status. A small number of birds of conservation concern were recorded as breeding at the site, including red

listed (and Priority Species) Skylark (14 pairs), Corn Bunting (2 pairs), Linnet (2 pairs), and amber listed Dunnock (1 pair), all of which are also priority species. The site supports a rather modest assemblage of breeding birds, primarily due to the uniformity of habitat present. Most notable is the presence of 14 Skylark territories spread throughout the abandoned arable habitat and two Corn Bunting territories on the north side. Both these species are included on the RSPB Red List having undergone major declines in their UK populations.

The 2022/23 wintering bird surveys indicate that the site supports a reasonable wintering bird assemblage, including declining farmland species which were observed to be foraging within the fields. Species recorded include Skylark (81) and Starling (270), with Corn Bunting occurring throughout October and November. In addition, there were regularly small numbers of Woodpigeon, Snipe, and Meadow Pipit, plus numerous gull sp., crows and thrushes foraging in the fields. None of these species were recorded in significant number and are all abundant in the UK in the winter. The 73 Lapwing and 16 Golden Plover present in December were of the greatest significance, although their presence was clearly a response to the cold weather, otherwise neither appears to be a regular occurrence at the site.

A further suite of wintering bird surveys was conducted at the site for the 2024/2025 wintering bird survey season in response to comments received from Natural England; with bimonthly visits being undertaken between November 2024 and February 2025. Overall, the results saw a decline in the peak count of the majority of species when compared to the 2022/23 surveys. Species recorded included a drop in the peak count of Skylark from 81 to 6, Starling 270 to 201, Lapwing 73 to 12 and Golden Plover 16 to 0. Furthermore, no bird species listed on the citations from surrounding designations, such as heron, have been recorded at the site, demonstrating that the site is not regularly used by a significant population of the bird species associated with the European sites. As such it is considered that the site does not support functional habitat for any of the nearby European designations. Natural England agree with this conclusion based on the survey work undertaken.

The proposals will include changes to habitats present, including the change from intensively managed arable to grassland habitats, which if managed appropriately will likely result in increased foraging value for bird species. Several bird nesting boxes are to be incorporated within the Proposed Scheme, thereby increasing nesting opportunities for birds at the site. In addition, significant areas of habitat are proposed within the areas of proposed open space and landscape planting (as indicated on the indicative Landscape Strategy Plan), which will provide a range of habitat types which are likely to provide some benefits for farmland birds specifically, both within and around the margins of the site. Elsewhere, wetland areas will provide new opportunities for species such as Snipe and Reed Bunting. Proposed woodland and scrub also has the potential to attract new bird species. A Skylark Mitigation and Compensation Strategy is also proposed which will incorporate Skylark plots within arable land located outside of the development areas. This can be secured via the recommended worded condition as per KCC recommendations, alongside details of further ecological enhancement.

Invertebrates

No evidence for the presence of any protected, rare or notable invertebrate species was recorded within the site. The site is dominated by recolonising arable land, which is likely to support only a limited diversity of invertebrates. The site supports (largely dry) ditches, gappy hedgerows and occasional patches of scrub, along with an offsite adjacent area of ancient woodland, but otherwise contains relatively few micro-habitats that would typically indicate elevated potential for invertebrates. Accordingly, given the habitat composition of the site and lack of adjacent sites designated for significant invertebrate interest, it is considered unlikely that the site supports a population of invertebrates of elevated ecological significance, and as such invertebrates at the site are not considered to form an important ecological feature.

Hedgerows and Trees

An Ecological Appraisal and Updated Arboricultural Assessment (Ref; 11711_AIA.001 Rev B, dated April 2025) and Arboricultural Technical Note (dated October 2025) has been submitted with the application alongside the ES. The Technical Note has been issued in response to local concerns raised in respect to the retention of trees on the north side of Christmas Lane, this includes 5 Oak Trees.

The site is dominated by temporary grassland, with an associated network of hedgerows and ditches. Other habitats within the site include scattered scrub and ruderal vegetation. Of the habitats within the site, hedgerows and woodland are considered to qualify as a priority habitat. A small patch of woodland is present in the southeast corner of the site and included within the red line boundary. The central section of woodland was found to comprise almost entirely semi-mature Aspen with a sparse canopy. Ground flora was limited to Nettles and Arum maculatum. The east and west of the woodland are denser in nature and also comprised a varied canopy composition, consisting of Oak, Cherry, Rose, Holly and Willow. The Woodland was found to largely be in poor condition. Impacts of development proposals on woodland habitats is limited to the central section of the woodland (G8) to provide access to the roundabout on Sharnal Street in subsequent phases of the development.

With the exception of Fisher's Wood which is located outside the red line site boundary there are no trees subject to Tree Preservation Orders (individual or area TPO's) within or adjacent to the site. Trees within influence of the application site are predominantly confined to the external boundaries, with the interior containing only two outlying trees of individual distinction. There are several parcels of ancient semi-natural and ancient replanted woodland in the area surrounding the site. Fisher's Wood is adjacent to the eastern site boundary and comprises Ancient and Semi-Natural Woodland. The impacts of which are considered earlier in this report.

Almost all hedgerows and tree lines are retained under the proposed development with losses limited to the removal of sections of hedgerow required to facilitate new access roads to Christmas Lane and their associated visibility splays as well as the new footpath link to the existing bus stop at the entrance to the village. The proposed development will also result in the loss of two isolated early-mature Oak trees (T16 and T17) in the centre of the site. These have been surveyed as category C1 trees

which are trees that are considered for retention and are of low quality with an estimated remaining life expectancy of at least 10 years or young trees with a stem diameter below 150mm.

There will be a requirement to mitigate for the loss of these trees and hedgerow, although this can be readily achieved through the introduction of new planting of a more comparable scale and assemblage. This has been recognised through design and areas of soft landscape are provided throughout the site that will be capable of receiving new high-quality planting. Overall, there will be a significant increase in the total length of hedgerow and in the number of individual trees to mitigate this loss.

All hedgerows and trees to be retained within the proposed development will also be protected during construction in line with standard arboriculturist best practice or as otherwise directed by a suitably competent arboriculturist. This will involve the use of protective fencing or other methods appropriate to safeguard the root protection areas of retained trees/hedgerows. The protection measures for trees and vegetation during construction, including any precautionary measures identified in respect to excavation within RPA's, will be secured by condition.

Pursuant to the Council's preference to ensure confident tree retention during the development, an Arboricultural Impact Assessment will be required following detailed design, alongside a detailed Arboricultural Method Statement (AMS). It is also recommended that detailed planting proposals are produced to demonstrate the approach to incorporating new planting within the site. This work will be secured by Condition. In addition, the Arboricultural Method Statement should address matters including specification for tree protection barriers, including revisions to barrier locations; a schedule of tree works; works within RPAs; and a scheme for auditing tree protection. Detailed tree protection drawings should be prepared to support the AMS, with detail given of proposed levels and service routes.

Local concerns have been raised in respect to the retention of trees on the north side of Christmas Lane which includes 5 Oak Trees which have formed the basis of a local campaign launched by the Hoo Peninsula Community Group. This has been addressed in Arboricultural Technical Note (dated October 2025) and has also considered the impact of the proposed Highways improvements on these trees as follows;

- The relationship between visibility splays associated with the proposed Christmas Tree Lane junctions and the hedgerow and trees fronting the site, specifically English Oak T21;
- The proposed footpath connection with Christmas Tree Lane from the south-western corner of the application area and its relationship with trees to the north of the carriageway;
- The effect of the proposed pedestrian surface which is shown to indicatively cross land outside of the application area between Holly House and the Coach Barn Kennels & Cattery on the northern side of Christmas Tree Lane.

The visibility splay associated with the junction to the west of T21 is shown to be clear of the tree and does not generate any conflict with the tree's measured trunk location.

However, the assessment has confirmed it will be necessary to remove sections of hedgerow H2 or to prune the hedgerow where it fronts Christmas Lane to provide adequate visibility splays. Ash Tree (T22) is also no longer proposed for retention as it is confirmed to comprise standing deadwood. The only tree works required to T21 will be to ensure its clearance over the carriageway by way of crown lifting and removing epicormic growth from the tree's lower trunk.

Where the footpath to the southwest of the site is proposed to link with the bus stop and existing village of High Halstow on the north side of Christmas Lane, it will be necessary to remove a 6m section of hedgerow H2 and to prune an ornamental hedge which fronts the verge hedgerow H4. The extent of pruning will vary along the length of H4, although is anticipated to amount to selective pruning by up to approx. 1m to reinstate its original width and the depth of the highway verge. Whilst some parts of H4 may temporarily appear bare following this work, it is anticipated that the hedge will produce new growth which can then be maintained to the edge of the verge (as per normal practises).

Category C Goat Willow T15 and Hornbeam T40-T43 have been planted on the edge of the highway verge as part of the adjacent development and will also need to be crown lifted to establish clearance over the proposed footpath. This is not unusual for trees in proximity to a public highway and would be required regardless of the development as the trees will eventually encroach over Christmas Lane. A specification for the pruning work could be agreed as part of a detailed Arboricultural Method Statement, although is anticipated to amount to the lifting of lower branches to achieve a minimum 2.5m vertical clearance.

The proposed footpath link is a natural desire line, and key connection point, where future occupants are likely to travel to access bus services. As such, there is an arboricultural interest which can be protected by establishing a durable surface over T15 and T40-T43's RPAs to facilitate this important connection. It is considered that this can be achieved by utilising a cellular confinement system subbase which would allow the footpath to be constructed at a raised profile, as opposed to excavating the verge. This approach has been accounted for within the updated highways design, where a raised construction profile is shown and the path is narrowed to ensure there is a suitable offset from tree trunks. A detailed works methodology for installing the path can be secured by way of condition.

A similar approach has been taken for the proposed path which is indicatively shown to cross land between Holly House and Coach Barn Kennels & Cattery. Whilst the path will be subject to detailed design and for others to deliver (Dean Lewis Estates land), there is no reason why the footpath could not be stepped into the site to allow the trees which front Christmas Tree Lane to be retained. Whilst this might mean that surfacing will need to be accommodated within the periphery of RPAs, this can be managed within the interest of the trees and would be the preferred outcome, over tree removal.

Accordingly, there will be no tree loss required to implement the works beyond those already reported within the submitted AIA. The assessment has revealed that it will be necessary to undertake light pruning and rely on effective mitigation for RPA encroachment affecting a limited number of trees on the northern verge. However, it

is considered that both pruning, and mitigation measures could be managed by way of an Arboricultural Method Statement secured by planning condition.

Mitigation Measures

Potential effects on Ancient Woodland and Hedgerows and Trees during the construction phase have been identified, largely as a result of potential encroachment of construction activities into proposed buffer zones, dust deposition and surface run-off of contaminants or silt. As such, it is proposed that standard mitigation measures are put in place during the construction phase, which can be secured as part of the CEMP. In addition, safeguards with respect to ecology and protected species during the construction phase can be secured through a standalone CEMP – Biodiversity which should set out steps to mitigate impacts to biodiversity and help ensure compliance with relevant legislation.

Mitigation measures are also proposed within Chapter 7.144 of the ES, in respect to general construction safeguards and methods during site clearance to ensure protected species and ecology is safeguarded. Measures will also be implemented as part of the detailed design of the built development to minimise adverse effects on habitats during the operational phase. This will include SuDS schemes, woodland buffers, integrated bird and bat boxes, new woodland planting, wetland features, hedgehog gaps, reptile receptor sites and supplementary habitats and sensitive lighting. All adverse effects to species can be fully mitigated through the implementation of a suitable Landscape and Environmental Management Plan (LEMP), together with suitable licencing (in the case of protected species).

Ecological Enhancements and Biodiversity Net Gain (BNG)

Although the application was submitted in April 2023 and is, therefore, not subject to mandatory Biodiversity Net Gain (BNG) requirements under the Environment Act as this was not introduced until February 2024, the Local Planning Authority has nonetheless requested that a Biodiversity Net Gain Assessment be prepared. This assessment is required to demonstrate how the development will deliver a minimum 10% gain in calculated biodiversity value. The applicant has, therefore, been required to evidence the proposed approach to achieving this uplift, via a BNG Assessment (Ref; 1005403, updated May 2025), ensuring that the development delivers measurable ecological enhancement in accordance with emerging local plan requirements and good practice.

To quantify the level of BNG that can be delivered under the proposed development, the change in biodiversity value resulting from the scheme has been calculated using the Metric calculation tool. This takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site and, therefore, determine the overall change in biodiversity value.

The post-development biodiversity value has also been calculated, based on the Illustrative Landscape Masterplan and Phase 1 hard and soft landscape details. A number of assumptions have been made in terms of the landscaping and

management proposals, based on comparative developments and what is realistic and feasible under the proposed land uses and landscape space types.

Ecological enhancements will also be incorporated into the proposed development as follows;

- Protection of the 'Fishers Wood' ancient woodland by means of buffer zones of semi-natural habitat;
- Creation of ecological buffer zones and green corridors throughout the open space areas, comprising new and retained grassland, ponds, scrub and woodland;
- Creation of new species rich grassland throughout the open space areas, notably within the central and northern open spaces;
- New and enhanced native hedgerow planting to increase ecological permeability, in particular restoring former hedgerow connections and forging new ones so as to afford better connectivity;
- Creation of SuDS features with ecologically sensitive designs, creating new aquatic habitat;
- New native tree and buffer planting to the peripheries of the site;
- The introduction of ecologically appropriate and sustainable management regimes for retained and newly created habitats.

The submitted Biodiversity Net Gain calculation demonstrates that the proposed development would deliver an uplift of 11.14% in habitat units and 44.23% in hedgerow units, thereby exceeding the minimum 10% net gain introduced by the Environment Act. To ensure that the target habitats are successfully created, established, and maintained over the long term, a detailed Landscape and Ecological Management Plan (LEMP) will be required. This will be secured via condition.

Northward Hill Site of Special Scientific Interest (SSSI)

Northward Hill SSSI/NNR site is a nationally important site, designated on the basis of its diverse bird life, which includes an important population of Nightingale, as well as breeding Long-eared Owls, and a heronry (although there is understood to have been a dramatic decline in the population of herons since the site was originally designated). The floodplain marshes to the north of the site also support important numbers of Lapwing and Wigeon. Although the designation is well separated from the proposed development there is the potential for indirect effects to occur, including disturbance resulting from increased visitor pressure, and pet predation. Nightingale, which use the scrub habitats within the southern part of the nature reserve and to which there is public access, are one species particularly sensitive to disturbance effects from walkers and their dogs. As a result, the additional population associated with the proposed development has the potential to cause additional disturbance and result in a decline in Nightingale populations, whilst populations of other bird species may also be affected in a similar way.

The effects of cat predation are unlikely to be significant due to the distance between the site and the designation. Based on research undertaken in regard to heathland sites, Natural England have identified a key risk zone of 400m within which sensitive

bird species could be adversely affected by cat predation, and this has informed the 400m exclusion zone adopted in relation to Thames Basin Heaths SPA. The Northward Hill SSSI/ NNR is located approximately 420m to the northwest of the site at its nearest point. As such, all new residential dwellings will be located outside of this 400m zone, and accordingly cat predation is not considered to form a likely significant effect relating to this, or any other statutory designation as a result of the proposals.

However, and in the absence of appropriate mitigation, the indirect effects of recreational disturbance are considered to be significant according to the ES. This increased pressure is expected to result from an increase in the number of visitors visiting the Nature Reserve, often with their dogs. Consultation between the applicant and the RSPB, who manages the site, has been carried out to identify the specific nature of the risks presented by this increase in visitors, in terms of the bird species which are most vulnerable, and which areas within the Nature Reserve this interest is located, to formulate a package of suitable mitigation measures.

Nightingale is identified by the RSPB as the species most sensitive to disturbance and accordingly forms the principal focus of concern. In 2022, the site supported 32 breeding pairs, representing a population of national importance. A substantial proportion of these pairs occupy areas of dense scrub thicket in the southern part of the reserve, dominated by Blackthorn, which is actively managed to maintain suitable habitat conditions for the species. This area broadly corresponds with those parts of the Nature Reserve that are currently accessible to the public. At present, the network of paths through these southern compartments is unfenced, allowing visitors and dogs to enter the scrub habitats directly. The absence of fencing also enables the creation of informal paths leading into the northern areas of the reserve, where public access is not permitted. These northern compartments include the location of the heronry, which is also sensitive to disturbance. Unrestricted access, therefore, increases the potential for disturbance to both the Nightingale population and other sensitive species present within the reserve.

Mitigation is, therefore, proposed within the Environmental Statement through the installation of approximately 3.7 km of new fencing, together with associated gates, to prevent uncontrolled public access into the sensitive areas of the Northward Hill reserve. This fencing will restrict access to the scrub habitats used by Nightingale and will prevent informal paths forming into the northern compartments of the reserve where public access is not permitted, including the area supporting the heronry.

Although the RSPB currently object to the application on the basis that the costs associated with delivering the 3.7 km fencing mitigation within Northward Hill SSSI have not yet been secured, the Section 106 agreement includes a £2,457,004.00 financial contribution towards a Strategic Environmental Mitigation Strategy (SEMS). This contribution will be directed towards the Northward Hill SSSI mitigation package and other identified sites, providing the capital funding necessary to implement the agreed measures.

Subject to the delivery of this mitigation, it is considered that the development will avoid any adverse effects on the integrity of Northward Hill SSSI/NNR. Natural

England has confirmed that, provided the mitigation is secured, the recreational disturbance impacts arising from the development can be fully mitigated.

Dalham Farm Site of Special Scientific Interest (SSSI)

Dalham Farm SSSI, located approximately 0.5 km to the west of the site, is designated for its geological interest. It represents one of the few undisturbed locations demonstrating mass-movement features on low-angled inland slopes of London Clay, including evidence of successive rotational landslips, expressed as a series of ridges and small scarps. As the designation relates solely to geological features rather than biodiversity, it is not considered to be an ecological receptor and has, therefore, been omitted from further consideration within this report.

Chattenden Woods and Lodge Hill Site Special Scientific Interest (SSSI)

Chattenden Woods SSSI, located approximately 1.7 km from the Site, is sufficiently distant for most potential impact pathways to be discounted on separation alone. However, the designation was identified by Natural England during the EIA scoping process as a sensitive local receptor and has, therefore, been included within the assessment to ensure that all relevant potential effects are appropriately considered. This relates specifically to air quality, as point-source emissions to air can give rise to effects over a far wider geographical area than other impact types, necessitating their inclusion in the scope of assessment.

When considering the potential effects of reduced air quality on woodland ecosystems within Chattenden Woods SSSI, the predicted results should be interpreted in the context of the following factors:

- Existing exceedance of critical levels/loads: Background concentrations already exceed relevant critical levels and loads. As a result, any further increase from the proposed development is not expected to produce a proportionate or linear increase in ecological effects;
- Very small area of the SSSI affected: Only a small proportion of the total SSSI falls within the modelled zone of effect for NO_x and for nitrogen deposition. Effects at this scale are unlikely to influence the integrity or functioning of the wider designated site;
- Condition assessments indicate management is the dominant factor: A review of SSSI woodland unit condition assessments indicates that management practices, rather than atmospheric inputs, are the primary determinant of ecological condition. Notably, all woodland units adjacent to the A28 are currently assessed as being in favourable condition due to active management;
- Predicted changes are below thresholds associated with measurable ecological impacts: The increase in nitrogen deposition is substantially lower than thresholds at which research suggests a measurable reduction in species richness may occur. Comparable studies (e.g., for heathland systems) indicate that a loss of one species may occur with an additional 2.4 kg N/ha/yr under a background deposition rate of 30 kg N/ha/yr, which is significantly higher than the changes predicted here.

On this basis, the small increases in NO_x and nitrogen deposition associated with the development are considered very unlikely to give rise to any significant or measurable ecological effect, particularly in the context of elevated background levels and the limited extent of the SSSI within the zone of influence.

Conclusions on Ecology

Subject to the implementation of the identified mitigation measures and the imposition of appropriate planning conditions, the proposed development is not expected to give rise to any unacceptable ecological impacts. The assessment confirms that, with the agreed mitigation strategies in place, including measures to prevent recreational disturbance to sensitive designated sites and controls to safeguard protected species and habitats there would be no significant adverse effects on statutory or non-statutory nature conservation interests and species.

Subject to the aforementioned conditions, as well as those detailed in the preceding ecology and tree sections no objections are raised with respect to Policies BNE35, BNE36, BNE37, BNE39, BNE41, BNE42 and BNE43 of the Local Plan, Policy S1, S2 and T1 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 136, 187 and 193 of the NPPF.

Habitat Regulation Assessment

A Report to Inform a Habitats Regulations Assessment (HRA) (Ref; 5403 HRA, updated April 2025) was submitted alongside the application to inform an assessment under the Habitat Regulations of the proposed development at the site, identifying whether the specific proposals are likely to result in an adverse effect on integrity of any international designations.

A review of the Medway Local Plan Habitats Regulations Assessment (HRA) identifies several potential impact pathways relevant to the designated sites referenced above. These include:

- Habitat fragmentation and loss;
- Disturbance (including recreational and noise-related disturbance);
- Changes to the hydrological regime and water levels;
- Changes to water quality;
- Reduced air quality.

These pathways have, therefore, been considered within the assessment to ensure that all potential effects on the identified European and nationally designated sites are appropriately addressed.

An initial assessment determined that the proposals do not relate to the management of the designations. A screening exercise has been undertaken to identify whether the proposed development could result in a likely significant effect on European designations, both alone and in-combination with other plans and projects. The screening exercise has concluded that in the absence of mitigation, potential for a likely significant effect is predicted in relation to visitor pressure (recreational disturbance) to Medway and Thames Estuary and Marshes. Loss of

functionally linked land for SPA bird species using these designations was also screened in. Therefore, an Appropriate Assessment is required with respect to these effect types.

Recreational Disturbance

As further detailed within the 'Bird Mitigation' section of this report below, Medway Council has measures in place to manage the potential impacts from increased recreational pressure on Thames Estuary and Marshes SPA and Ramsar site, and Medway Estuary and Marshes SPA and Ramsar site, in the form of a strategic solution. Natural England has advised that this solution will be reliable and effective in preventing adverse effects on the integrity of those European Sites falling within the 6km Zone of Influence (ZOI) from the recreational impacts associated with this residential development.

Natural England advises that the specific measures (including financial contributions) identified in the strategic solution, in this case the North Kent Strategic Access and Monitoring Strategy (SAMMS), can prevent harmful effects from increased recreational pressure on those European Sites within the ZOI.

The HRA prepared by the applicant concludes that the proposal will not result in adverse effects on the integrity of any of the sites as highlighted above (in view of its conservation objectives) with regards to recreational disturbance, on the basis that the strategic solution will be implemented by way of mitigation. Natural England concur with the assessment's conclusion regarding the impacts of increased recreational disturbance.

Habitat fragmentation and loss (functionally linked land)

Natural England previously advised (our ref: 495432, dated 31 January 2025) that, in the absence of robust winter bird survey information to demonstrate that the site is not functionally linked with the Thames Estuary and Marshes SPA and Ramsar site and the Medway Estuary and Marshes SPA and Ramsar site, mitigation measures were likely to be required to mitigate the impacts to birds associated with the European sites.

As a result, further winter bird surveys were carried out in 2024/2025. Natural England agree with the assessment's conclusion that these additional winter bird surveys demonstrate that the site is not regularly used by a significant population of the bird species associated with the European sites and the site is, therefore, not likely to be functionally linked with the European sites. Natural England, therefore, concur with the assessment's conclusion that the proposed development will have no likely significant effect on the integrity of the Thames Estuary and Marshes SPA and Ramsar site and the Medway Estuary and Marshes SPA and Ramsar site through habitat fragmentation and loss, and, therefore, no mitigation for this is required.

The Appropriate Assessment has concluded that, in view of the designations' conservation objectives, following the implementation of mitigation measures the

proposed development would have no effect on the integrity of the surrounding European designations either alone or in-combination with other plans and projects. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England have advised that they concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given.

Medway Estuary and Marshes Special Protection Area (SPA) - Bird Mitigation

As the application site is within 6km of the North Kent Marshes SPA/Ramsar Sites, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. Natural England has advised that an appropriate tariff, that currently stands at £337.49 per dwelling (excluding legal and monitoring officer's costs) should be collected to fund strategic measures across the Thames, Medway and Swale Estuaries. This tariff should be collected for new dwellings, either as new builds or conversions (which includes HMOs and student accommodation).

These strategic SAMMS mitigation measures are being delivered through Bird Wise North Kent, which is the brand name of the North Kent Strategic Access Management and Monitoring Scheme (SAMMS) Board, and the mitigation measures have been informed by the Category A measures identified in the Thames, Medway & Swale Estuaries Strategic Access Management and Monitoring Strategy (SAMM) produced by Footprint Ecology in July 2014. Further information regarding the work being undertaken is available at The Bird Wise website which can be found at <https://northkent.birdwise.org.uk/about/>.

The applicants have agreed to pay this tariff, and this would be secured as part of a section 106 agreement. The proposal is, therefore, in accordance with Policies S6 and BNE35 of the Local Plan, Policy S3 of Emerging Local Plan and paragraphs 194 and 195 of the NPPF.

A decision from the Court of Justice of the European Union detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full 'appropriate assessment' is needed under the Habitats Directive. Given the need for the application to contribute to the North Kent SAMMS, there is a need for an appropriate assessment to be carried out as part of this application. This is included as a separate assessment form.

Highways and Transport

Policy T1, T2 and T13 of the Local Plan states development proposals should not have a significant or unacceptable impact on highway safety or the existing road network and should make vehicle parking provision in accordance with the adopted standard. Policies DM15 and DM18 of the (Regulation 22) Medway Local Plan 2041 requires that development of over 50 homes should demonstrate how vehicle trip generation would be materially lower than the vehicle trip credit set in the Infrastructure Delivery Plan. It also requires that a Transport Assessment or

Transport Statement will need to be agreed with National Highways for development proposals that impact on the Strategic Road Network (SRN).

Policy SA9 of the (Regulation 22) Medway Local Plan 2041 requires that the development of land east of High Halstow delivers high levels of connectivity and permeability between the site and the existing village. Proposals must demonstrate strong integration with the established settlement pattern and provide safe, direct, and attractive routes for pedestrians and cyclists, alongside measures to enhance public transport provision.

The policy further requires that development should support improvements to local bus services to ensure effective and sustainable transport links for the village. This includes consideration of an extension of fast-track bus services connecting High Halstow with the wider urban area. Primary vehicular access is required to be taken from the roundabout at Christmas Lane. In addition, Policy SA9 requires that developers must contribute towards the delivery of highways mitigation measures necessary to accommodate planned growth, including capacity improvements at the following locations:

- Four Elms Roundabout;
- Main Road, Hoo (junction with the A228);
- Dux Court Road / Bells Lane junction with the A228;
- Ropers Lane junction with the A228.

Paragraph 110 of the NPPF advises that significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

The application was originally submitted with a Transport Assessment (Ref; 271568-00, dated March 2023). Following a holding objection from National Highways, and a request for further information, the applicant then submitted a Transport Addendum 2 (TA2) (dated June 2025), Transport Addendum 3 (TA3) (dated July 2025) and Transport Summary Statement (December 2025).

Existing Conditions

The site comprises arable land currently in agricultural use and is situated on the Hoo Peninsula, which lies between the River Thames to the north and the River Medway to the south. It is located immediately east of the village of High Halstow, adjoining the existing settlement edge. The Site is bounded by Britannia Road to the north, the A228 Sharnal Street to the east, Christmas Lane to the south, and the village of High Halstow to the west.

The site boundary incorporates a small pocket of woodland and Fishers Wood wraps around a separate landholding on the southern boundary. The land is traversed by Public Right of Way (PRoW) RS44, which provides an important pedestrian link

between the High Halstow urban area, Britannia Road, and Christmas Lane. The western end of this footpath connects into the village at Ruggles Close, while the eastern section links with Britannia Road. At its southern point, the route crosses Christmas Lane and continues across open fields towards both the A228 and A228 Sharnal Street, just south of its junction with Christmas Lane.

Pedestrian and Cycling Infrastructure

Pedestrian footways are provided alongside the carriageways within the built-up area of High Halstow, including along sections of Christmas Lane and Britannia Road. However, continuous pedestrian provision is absent along the stretches of Christmas Lane and Britannia Road that adjoin the application site. An exception exists at the eastern end of Christmas Lane, where a disused section of former highway currently functions as an off-carriageway footway and cycleway, offering a segregated route for pedestrians and cyclists.

National Cycle Network (NCN) Route 179, also known as the Heron Trail, runs along Christmas Lane adjacent to the site. Along this section, the route is largely on-carriageway, with no dedicated cycling infrastructure other than route signage. An exception occurs at the eastern end of Christmas Lane, where a segregated off-road pedestrian and cycle route is provided. To the southeast of the site, the 'old' Sharnal Street corridor offers a continuous cycle connection linking High Halstow with Hoo and Wainscott. This route comprises a combination of on-carriageway cycling and segregated off-carriageway facilities, providing an established active-travel link between the settlements.

The existing Public Right of Way (PRoW) that crosses the site will be retained and enhanced, with only a minor diversion required to accommodate the proposed development. To strengthen pedestrian connectivity between the site and the existing village, the PRoW to the west will be upgraded to provide a more direct, higher-quality route between the new neighbourhood and High Halstow. This would accord with Policy L10 of the Local Plan.

New pedestrian links will also be created to connect the development with the existing footways along Britannia Road, improving permeability and walkability. In addition, a new pedestrian and cycle route will be delivered along Christmas Lane, utilising the existing verges to form an off-carriageway connection between the existing village and 'old' Sharnal Street. This new route will enhance active-travel access and provide a safe, continuous link for both pedestrians and cyclists.

Across the site, the proposed pedestrian and cycle network will integrate with the existing routes to the west and southeast. New footways and cycle routes will be delivered along the primary and secondary streets, as well as through green corridors and open spaces, to enhance permeability and provide a legible, attractive environment for walking and cycling. These links will create opportunities for active travel, support recreational use, and enable convenient access to local shops and community facilities on foot or by bicycle. A series of clearly pedestrian and cycle access points will connect the site to the surrounding network, supported by a comprehensive system of internal walking and cycling routes. Together, these measures will establish a safe, direct, and integrated active-travel framework.

The proposed development will be accessible by bus, with existing bus stops already located on both Britannia Road and Christmas Lane. Given that the site is approx. 400 metres wide, all future residents will be within 400 metres (around a five-minute walk) of a bus stop, consistent with national guidance on walkable access to public transport. The primary north–south vehicular route through the western part of the site has also been designed to accommodate potential future bus services, should these be extended into the development. However, it is important to safeguard kerb space and other spaces along this route to enable future service provision. This will be secured by condition.

To enhance accessibility and support improved bus provision for future residents, the proposals include:

- Two new pairs of bus stops on Britannia Road;
- One new pair of bus stops on Christmas Lane;
- Upgrading of the existing westbound bus stop located to the west of the A228 Sharnal Street / A228 Ratcliffe Highway / Christmas Lane roundabout.

These measures will improve coverage, reduce walking distances, and facilitate the future enhancement of sustainable public transport links across the wider area.

Public Transport

High Halstow is currently served by a single regular bus service, the 191/193, which stops on Christmas Lane, within the village, and on Britannia Road. This route provides connections between Gillingham and Grain, travelling via Rochester, Strood, and High Halstow, with one service operating in each direction. The 191/193 also offers interchange opportunities at Chatham Waterfront Bus Station, where passengers can access a wider range of bus services covering the broader Medway area. As is typical of rural and semi-rural services, the locally accessible bus routes are not high-frequency. Services operate intermittently throughout the day, aside from peak-time morning services, and generally finish by 7.15pm. In addition to the regular service, two dedicated school buses (routes 10 and 692) operate via High Halstow. These provide one morning and one afternoon journey to The Hundred of Hoo Academy and Rochester Grammar School, respectively.

Access and Highway Safety

The development will be served by five new vehicular access points, comprising two accesses from Britannia Road, two from Christmas Lane, and a single access from the A228 Sharnal Street roundabout. Manual for Street compliant visibility splays can also be achieved from the proposed access points. These access arrangements will ensure a well-connected and legible movement network, distributing traffic appropriately across the surrounding highway system. A summary of the proposed works to the public highway is provided below.

Britannia Road – West Access

- Construction of a 5.50m-wide vehicular access, with 6m (west) and 6.5m (east) kerb radii;

- Provision of a 2m-wide footway along the southern side of Britannia Road;
- Localised carriageway widening on the south side of the highway;
- Extension of the existing footway on the northern side;
- Installation of two new bus stops on the north and south sides of Britannia Road, including associated new footway provision.

Britannia Road – East Access

- Construction of a 5.50m-wide access, with 4m (west) and 6m (east) kerb radii.
- Provision of two new bus stops to the north and south of the carriageway, plus associated new footway links.

A228 Sharnal Street - North

- Delivery of a new footway link from the site, providing pedestrian access to the east side of Sharnal Street via a Puffin crossing.

A228 Sharnal Street (South)/ Christmas Lane (East)

- Widening of the existing 3m-wide shared footway/cycleway into the carriageway;
- Provision for a Toucan crossing;
- Construction of a new 3m-wide shared footway/cycleway, including resurfacing of the existing combined route;
- Introduction of a new vehicular access from the Site onto the roundabout, together with the construction of a parallel crossing;
- Provision of a 2.0m–2.7m-wide footway on the northern side of Christmas Lane;
- Upgrading of the footway adjacent to the existing bus stop;
- Construction of a 5.5m-wide access with 6m radii;
- Provision of a new bus stop on the northern side of Christmas Lane.

Christmas Lane – West Access

- Conversion of the existing overrun area on the western side into a formal bus stop;
- Proposed carriageway widening to the north;
- Implementation of two speed-control measures to the north and south;
- Construction of a 5.50m-wide vehicular access with 6m radii;
- Construction of a 1.8m footway to the west;
- Enhancement to the Public Right of Way footway on the site's northern boundary.

Analysis of personal-injury collision data for the most recent five-year period (2020–2024), obtained from CrashMap records, has been undertaken to assess prevailing road-safety conditions in the vicinity of the proposed development. Within the study area, ten accidents were recorded during this period. Of these, seven were classified as 'slight' and three as 'serious', with no fatal accidents recorded. The three

collisions recorded as serious each involved two vehicles and occurred on Fenn Street, Malmaynes Hall Road, and the old Sharnal Street.

The proposed development will deliver new pedestrian facilities along Christmas Lane, together with enhanced pedestrian and cycle connections for journeys to the south. In addition, the scheme will facilitate the relocation of the existing primary school from The Street, reducing pedestrian activity along a constrained route that currently accommodates school-related movements. As a result, the development is not expected to exacerbate existing highway safety concerns, and the package of improvements is anticipated to deliver overall safety benefits for pedestrians and cyclists by providing safer, more direct and better-quality active-travel infrastructure.

Travel Demand

The TA explains how the likely movement patterns generated by the proposed development have been assessed using comparable TRICS datasets and local school travel information. For the residential element, trip-rate data was derived from six comparable TRICS sites comprising a mix of predominantly privately owned houses. A weighted average was used to generate representative multimodal trip rates for the proposed dwelling mix. Applying these trip rates to the development results in an estimated 374 two-way vehicle trips in the AM peak hour (125 arrivals and 249 departures) and 344 two-way vehicle trips in the PM peak hour (222 arrivals and 122 departures).

Alongside the residential component, the development includes a new two-form-entry primary school accommodating approx. 420 pupils and 36 staff. Trip generation for the school was based on observed mode share information for High Halstow and nearby primary schools, where walking accounts for the majority of pupil trips. Staff travel is expected to be dominated by car trips, while most pupils are expected to walk. Applying these assumptions produces 24 staff vehicle arrivals in the AM peak and 24 staff vehicle departures in the PM peak, with additional pedestrian movements generated by both staff and pupils. The school-related trips associated with parents and pupils, based on 2011 Census data and validated against observed traffic flows, are forecast to give rise to 320 vehicle trips (160 in and 160 out) in the AM peak period and no vehicle trips in the PM peak, since primary school pick-up activity falls outside the standard highway network PM peak hour. These trips also generate substantial pedestrian/cycle movements, with 780 pupil and parent pedestrian trips in the AM peak.

When combined, the residential and school components of the development produce a forecast total of 718 vehicle trips in the AM peak hour (309 arrivals and 409 departures) and 368 vehicle trips in the PM peak hour (222 arrivals and 146 departures). These combined forecasts represent a robust worst-case scenario, incorporating conservative assumptions for school escort trips and ensuring that impacts on the local highway network are appropriately assessed.

Construction traffic is expected to remain relatively steady throughout the build period, generating around 100 two-way vehicle movements per day, including approximately 20 HGV and 80 workforce car/van movements. Most HGV and LGV trips will occur outside the highway peak periods and be spread across the working

day. During peak construction activity, this equates to roughly 2 HGVs per hour and 8 LGVs per hour over a typical 10-hour day. Around 20 construction worker arrivals and 20 departures are expected during both the morning and evening peak hours. The construction activity at the site will be controlled through a Construction Environmental Management Plan (CEMP), secured by condition for each phase of the development.

Paragraph 116 of the NPPF states that development should only be prevented or refused on highway grounds where it would result in an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. The additional trips generated by the development demonstrate that, subject to mitigation secured through conditions and s106 obligations, there would be no unacceptable impact on the highway network.

Junction Assessment

The TA also evaluates the likely impact of the development on three key junctions surrounding the site, using 2037 forecast conditions both with and without the development in place. The first is the A228 Sharnal Street / A228 Ratcliffe Highway / Christmas Lane roundabout. The modelling demonstrates that this junction would continue to operate well within its available capacity in both scenarios. Queue lengths remain low, typically no more than three passenger-car units, and all movements fall comfortably within acceptable ratios of flow to capacity. Even with the addition of a new arm to serve the development, the roundabout is shown to perform effectively without any capacity or queuing issues.

The second junction assessed was the A228 Sharnal Street / Britannia Road priority junction. Here too, the modelling indicates good performance across both the future base and future base plus development scenarios. All movements are forecast to operate with significant reserve capacity, with queues predicted to remain below one passenger-car unit on every approach. The assessment, therefore, concludes that this junction would not experience any material operational issues as a result of the development.

The third junction considered is the proposed site access on Christmas Lane. This junction experiences the highest proportion of development-generated trips, yet it too is shown to function efficiently in 2037 conditions. In both peak periods, modelled queues are minimal and the ratio of flow to capacity remains low, indicating that the junction will continue to operate with substantial spare capacity.

Four Elms and Sans Pareil Roundabout

The Medway Transport Model Forecasting Report undertaken by Jacobs as part of the Local Plan evidence base identifies Four Elms Roundabout as one of the most significantly impacted junctions. Committed development on the Hoo Peninsula, combined with Local Plan growth, results in large increases in traffic demand on the A228 Peninsula Way and A289 approaches. In both AM and PM peaks, the junction experiences severe queuing, with queues on A289 Hasted Road and A289 Wulfere Way increasing by a significant number of vehicles under the Do Something (DS)

and Interim Do Something (IDS) scenarios. These pressures result in widespread rerouting through Wainscott residential streets (Hollywood Lane, Cooling Road, Iden Road), reflecting drivers avoiding excessive delays at the junction. Even with the interim MedwayOne mitigation in the refined reference case, the roundabout remains a bottleneck and is identified as a priority for major junction improvement to support Local Plan growth.

Local Plan growth also results in a marked deterioration of performance at Sans Pareil Roundabout, though to a lesser extent than at Four Elms. Increased flows between the M2, Wainscott and the Hoo Peninsula produce higher turning movements, particularly from A289 Wulfere Way and Frindsbury Hill. Under DS and iDS scenarios, the roundabout experiences queue length increases and turning movements approaching capacity, with delays worsening on key approaches. Resolved capacity at Four Elms in the 'unconstrained' tests also leads to higher flows reaching Sans Pareil, identifying it as part of a wider corridor impact between Strood, Wainscott, and the Peninsula. This junction is flagged for local junction modelling and potential mitigation to support wider network resilience.

Mitigation is proposed at both Four Elms Roundabout and Sans Pareil Roundabout to address the capacity pressures identified in the Final Do Something with Mitigation scenario. At Four Elms, a major upgrade is required, including widened approaches, additional flares and revised lane arrangements to accommodate significant traffic growth generated by development on the Hoo Peninsula and to prevent rerouting through Wainscott's residential streets. When embedded in the "Final Do-Something with mitigation" scenario, the scheme returns the junction to within capacity and reduces queues materially. At Sans Pareil, targeted improvements, such as approach widening, extra flares and lane optimisation, are proposed to manage increased flows along the A289 corridor and to ensure the junction operates effectively once Four Elms is improved.

The mitigation required at Four Elms roundabout and Sans Pareil roundabout as well as the infrastructure improvement required for Main Road and Ropers Lane will be funded through a combination of Government infrastructure investment and developer contributions. The Section 106 contributions necessary to secure this funding will be calculated based on the developments that would be required to contribute to the identified junction improvements.

In addition, the Council is commissioning further work to design an interim solution within the first five years of the plan period to help unlock phased growth. This work is ongoing, but the costs of delivering it will be apportioned in the same way.

A Grampian-style condition would need to be applied, restricting occupation up to the 350 dwellings identified as being delivered in the first 5 years of the Local Plan and linked to the stepped trajectory proposed as part of the Local Plan submission until the necessary off-site highway improvement works are delivered. This approach ensures that the development does not place unacceptable pressure on the local highway network prior to the mitigation being in place.

Framework Travel Plan

A framework travel plan has also been included within the Transport Assessment which sets out measures that could be implemented to encourage walking, cycling and the promotion of public transport. The Residential Travel Plan (RTP) aims to inform residents about sustainable travel choices, encourage mode shift away from single-occupancy car use, and highlight the health benefits of walking and cycling. To deliver the strategy, the RTP combines hard measures built into the scheme with soft measures and ongoing management. Physical measures include a permeable network of new and enhanced footways and cycle routes, improvements to Public Rights of Way, off-carriageway connections along Christmas Lane, and new controlled crossings on the A228, alongside secure cycle parking for every dwelling (houses with on-plot stores/garages; flats in communal stores), and EV charging (active provision on plots and in allocated courtyards; active + passive in unallocated courtyards). These design choices are intended to make active travel convenient and safe, while ensuring necessary car use is accommodated without dominating the streetscape. Soft measures centre on resident communication and behaviour change, i.e.; every home receives a travel pack promoting local walking/cycling routes, bus and rail options, journey-planning links, nearby amenities, car-share schemes, and the benefits of low-carbon travel. The plan also ensures broadband availability in each dwelling to support information access and flexible working.

The School Travel Plan (STP) mirrors the residential approach but is tailored to the needs of a two-form-entry primary school. Its objectives are to ensure staff, pupils and parents understand their sustainable travel options, to facilitate and promote walking, cycling and bus use, and to emphasise associated health and road-safety benefits.

The hard measures supporting the school include the same active-travel spine as the wider development (enhanced PRow links, improved footway/cycleway connections on Britannia Road and Christmas Lane, a new Toucan crossing near the A228 roundabout and a Puffin crossing on A228 Sharnal Street), plus on-site cycle parking, staff car parking, and a dedicated internal drop-off/pick-up loop designed to manage short-stay demand safely and reduce kerbside pressure. The soft measures are delivered through a school travel pack, a sustainable-travel noticeboard and website content signposting bus/rail information, cycle facilities and local routes, together with a programme of behaviour-change and safety initiatives.

Further details of both the residential and school Travel Plans, including a full programme of measures and the mechanisms for monitoring, review and implementation, can be secured by way of an appropriately worded planning condition.

Impact on Strategic Road Network (SRN) – M2 Junction 1

National Highways initially issued a holding objection due to concerns regarding the potential impact of the proposed development on the safe and efficient operation of the Strategic Road Network (SRN), particularly in the vicinity of M2 Junction 1. In response, the applicant's transport consultants submitted two further technical

documents, Transport Addendum 2 (TA2) and Transport Addendum 3 (TA3), to supplement and clarify the findings of the original Transport Assessment.

National Highways' previous review of Transport Addendum 2 (TA2) identified that the traffic-flow forecasts derived from the strategic model were lower than the flows calculated manually. In response to these concerns, Transport Addendum 3 (TA3) provides additional analysis setting out the differences in forecast flow outputs from the VISUM assignment model resulting from the proposed development. In particular, TA3 includes the following:

AM and PM peak hour flow difference plots

Inner cordon flow difference.

Midway cordon flow difference.

Outer cordon flow difference.

National Highways has reviewed the cordon data and confirmed that it appropriately demonstrates the flow differences across all potential routing options for development-generated traffic. The analysis shows that the cordon outputs are consistent with, and provide justification for, the previously submitted junction-level assessments. On this basis, the cordon data is considered robust and acceptable. In addition, TA3 includes a merge/diverge assessment for M2 Junction 1, utilising traffic-flow data derived from the VISUM strategic model. This assessment offers further assurance that the operational performance of the Strategic Road Network has been properly evaluated in relation to the proposed development.

The merge assessment has been reviewed and is considered to be in order. The results confirm that the development is not forecast to generate any impacts that would necessitate modification of the existing merge or diverge arrangements. While the assessment identifies one location where substandard operation is forecast, this occurs in both the "without development" and "with development" scenarios. Accordingly, it is concluded that the merge/diverge assessment is acceptable in the context of this application and does not indicate any requirement for the development to alter existing merge or diverge types.

TA3 also includes a collision analysis for M2 Junction 1. Collision data has been presented for all four slip roads, both off-slips and both on-slips, with particular attention given to multi-vehicle incidents. The analysis identifies six multi-vehicle collisions on the eastbound off-slip, four on the westbound on-slip, three on the eastbound on-slip, and two on the westbound off-slip. TA3 concludes that these incidents do not exhibit any clear trends or recurring patterns that would suggest an underlying safety issue.

Single vehicle collisions are noted to be clustered in certain locations, most notably on the M2 westbound off-slip. These incidents are attributed to "bend and loss-of-control" type events rather than deficiencies in junction layout or operation. Having reviewed the information, it is agreed that the collision data—when assessed against standard criteria does not indicate any significant existing safety concerns at M2 Junction 1.

As a result of the latest and previous evidence submitted, National Highways has been able to fully assess the likely impacts of the proposed development on the Strategic Road Network (SRN). They have confirmed that the development would not result in a severe impact on the SRN nor give rise to an unacceptable impact on its safety, in accordance with the tests set out in DfT Circular 01/2022 and the NPPF.

Given the site's proximity to the SRN and the likelihood that it would serve as the primary route for construction traffic, it is nevertheless considered necessary and appropriate to secure a Construction Traffic Management Plan (CTMP) by condition. This will ensure that construction-phase vehicle movements are effectively managed, and that the safe and efficient operation of the SRN is maintained throughout the build period.

Parking

In accordance with Medway Council's Interim Parking Standards, provision should be made at the following rates:

- 1 space per 1-bedroom dwelling;
- 1.5 spaces per 2-bedroom dwelling; and
- 2 spaces per dwelling with 3 or more bedrooms.

For Phase 1, a total of 572 car-parking spaces are proposed to serve 270 residential units. This comprises 485 allocated spaces, 7 unallocated spaces, 68 visitor spaces, and an additional 12 spaces to support the proposed commercial uses. Overall, this level of provision meets Medway Council's minimum parking standards. Car parking would be delivered in a variety of forms, including car ports, garages, courtyard parking, tandem spaces, and on-street spaces, providing flexibility and ensuring parking is appropriately integrated into the layout. Parking provision for the outline element of the application will be secured through future Reserved Matters applications, where detailed layouts and compliance with the adopted standards will be confirmed.

Electric-vehicle (EV) charging provision for Phase 1 is proposed as follows:

- All houses will be provided with one active EV charging point per dwelling;
- All courtyard areas where parking is allocated to individual dwellings will also provide one active EV charging point per dwelling;
- In courtyards with unallocated parking, 10% of spaces will be equipped with active charging, with the remaining spaces provided with passive (future-ready) infrastructure to allow for straightforward upgrading as demand increases;
- All commercial parking spaces will be provided with one active EV charging point per space.

Cycle parking is also proposed to be provided in accordance with the standards as follows:

- All houses will be provided with one cycle-parking space per dwelling, either within garages or in dedicated on-plot cycle-storage units;

- All flats will be provided with one cycle-parking space per dwelling within secure, communal cycle stores;
- Non-residential uses will be provided with cycle-parking spaces within the respective buildings.

Conditions are recommended to secure the provision of these spaces on site prior to occupation, and to ensure their retention for parking purposes thereafter, together with the submission of further details relating to the proposed EV-charging facilities and cycle storage facilities.

Transport Vision

A Transport Summary Statement (dated December 2025) has also been submitted, which sets out the overall transport vision for the development. The transport vision presents the applicants approach to creating a more sustainable, better connected, and resilient community in High Halstow. It seeks to reduce the need for car travel by expanding the village to a scale that can support a broader range of local services, including a centrally located new primary school, commercial space, play areas and public open spaces, all within convenient walking distance of both new and existing residents. The vision emphasises strong, high-quality pedestrian and cycle connectivity, delivered through new and enhanced routes, improvements to Public Rights of Way, off-carriageway cycle facilities along Christmas Lane, and a new signal-controlled cycle crossing over the A228, collectively enabling safe and direct active-travel journeys within and beyond the village.

The development also strengthens access to public transport by providing new and upgraded bus stops with improved boarding facilities and by safeguarding internal streets capable of accommodating future bus services aligned with Medway Council's emerging Local Plan. Streets across the site will be designed as slow-speed, following Manual for Streets principles, encouraging walking and cycling while ensuring safe, suitable access for all users. Alongside this, the provision of secure cycle parking and universal EV-charging infrastructure for homes and businesses supports the transition to low-carbon transport.

The new two-form entry primary school is designed to facilitate walking journeys by localising primary education and reducing unnecessary car trips. Policy DM12 specifically references High Halstow and requires that uses within the local centre be "appropriate to the scale, character and role of the centre... and include convenience retail offer to provide top-up shopping, community uses, [and] services... providing convenience for local communities (allowing various activities to be undertaken)." While the concept of the local centre is acknowledged within the Transport Summary Statement, a condition is intended to secure this in more detail. The condition is necessary to ensure that the local centre is capable of genuinely reducing the need for residents to travel beyond the development for day-to-day needs. Without such controls, the commercial space could be reduced in scale or occupied by niche or infrequent-use businesses (for example, bridal boutiques or estate agents), rather than the everyday convenience retail that is fundamental to supporting sustainable living. At the same time, it is important to maintain the retail hierarchy and to avoid over-provision, so that the centre does not become a destination attracting

substantial trips from outside High Halstow, which would undermine its intended local function.

The Transport Vision also references the emerging Local Plan's 30% mode-share target for the site and demonstrates how this could be supported through walking and cycling permeability interventions, alongside a commitment to design roads and safeguard kerb space to enable a future bus service within the development. Collectively, these measures contribute qualitatively to a vision that is consistent with the aspirations of the emerging Plan. It is also reasonable to acknowledge that the full realisation of the emerging Local Plan's ambitions for this site is likely to be dependent on the successful delivery of the broader transport vision for the allocations located closer to Hoo.

Previous comments questioned the need for a general traffic access to the north-west. The applicant has clarified that this access is intended to enable potential School Street interventions in the future by providing an alternative route for residents living to the north of the school. In the context of this site, facilitating a School Street is considered preferable to restricting use of the access, as previously suggested. Medway Council is already rolling out School Streets for existing schools; however, delivery is often constrained by the outcome of public consultation and the practical challenges of retrofitting supporting measures. To address this, a condition has been imposed requiring further engagement with the Local Planning Authority's School Street team, with the aim of designing-in appropriate measures from the outset, ensuring that a School Street could be implemented from the day the new school opens.

In addition, highways mitigation measures necessary to accommodate planned growth, including capacity improvements are also proposed relative to the scale of development and will be secured as part of the s106 as detailed with the heads of terms.

Active Travel England

Active Travel England (ATE) issued a holding objection to the application on the basis that the material submitted did not, in its view, demonstrate that the design and proposed infrastructure would sufficiently embed and promote active travel. ATE's concerns centred on the absence of clear evidence regarding the nature and specification of walking and cycling routes within the development; potential gaps in connectivity between the site, High Halstow and Hoo; the inclusion of shared-use paths where these may not be appropriate; insufficient detail in relation to cycle parking; and a need for more robust active travel trip generation, monitoring and enforcement within the Travel Plan. ATE also requested clarification regarding the treatment of the Public Right of Way (PRoW RS44), particularly where it crosses land outside the applicant's control.

In response, the applicant has submitted a Transport Summary Statement (December 2025) which consolidates the Transport Assessment, related addendums and updated drawings. This document sets out a strategy to deliver a connected network of walking, cycling and public transport routes, both within the site and linking to surrounding settlements. The strategy includes surfacing and lighting

upgrades to the PRoW that runs from the site to Topley Drive, together with the bridging of the ditch and removal of the existing fence to create a more direct route. The development also proposes off-carriageway cycle infrastructure along Christmas Lane to connect the site with “old” Sharnal Street, together with new controlled pedestrian and cycle crossings on the A228 to reduce severance between the site and wider destinations. The scheme provides upgrades to existing bus stops and introduces new stops on Britannia Road and Christmas Lane, while also safeguarding a bus-navigable street through the site to enable future service enhancements.

The applicant acknowledges ATE’s concern regarding shared-use routes and confirms that any such sections will be delivered only where they meet the circumstances identified in LTN 1/20. The applicant agrees that detailed designs will be provided at the reserved matters stage, referencing LTN 1/20 Section 6.5 and Table 6-3 to ensure appropriate widths, layouts and user segregation wherever feasible. Cycle parking will also be provided in accordance with Medway policy and LTN 1/20, including provision for non-standard cycles. These details will be secured through condition.

In terms of the PRoW, although a short section lies within third-party ownership, this does not prevent the route being enhanced or delivered. Public Rights of Way are highways in law, and local authorities, including unitary councils, have statutory responsibilities for maintaining them in a fit state for public use and for removing obstructions, regardless of landownership beneath the surface. DEFRA’s Rights of Way Circular 1/09 confirms that authorities are responsible for recording, managing, maintaining and changing PRoW, and GOV.UK guidance reiterates that authorities must ensure that PRoW remain unobstructed and safe to use. Works to enhance PRoW can be carried out either by the authority itself or by agreement with the landowner, and the applicant’s proposed improvements such as surfacing and lighting will be secured via the S106 agreement via the submission of an implementation plan.

Officers have reviewed the updated transport evidence and consider that the proposals now take appropriate opportunities to promote sustainable transport in accordance with the NPPF. The combination of internal permeability improved external connections, low-speed street design, Travel Plan arrangements and enhanced facilities for walking, wheeling and cycling is considered to provide safe and suitable access for all users. The network of proposed and upgraded routes is considered sufficiently coherent to support everyday journeys by active modes, while the safeguarded bus access provides the basis for future public transport improvements. The proposed slow-speed street environment accords with Manual for Streets principles and is expected to reduce conflict between vehicles and pedestrians or cyclists. The Transport Summary Statement also includes trip-generation forecasts and provides a suitable basis for phase-specific Travel Plans. It is recommended that Travel Plan(s) relevant to each phase are secured via condition, including mode-share targets, monitoring, and appropriate funding for implementation.

To secure further details of the active travel network, a condition is recommended requiring further details of the proposed street designs, including cycle routes,

shared use pavements, footways and crossing points. These details should include their function, width, surfacing, gradients and crossing arrangements of all active travel routes. A PRow Implementation Plan would also be required, setting out the timetable, responsibilities and consents for delivering PRow improvements. This will be secured as part of the s106 agreement, given that elements of these upgrades would fall outside the application site boundary. A Cycle Parking Strategy will also be required and should include adequate accommodation for non-standard cycles, as well as a condition to secure safeguarded bus stop locations along the internal road network that have been designed to accommodate buses as indicated on Figure 5 of the Transport Summary (December 2025).

In addition, the inclusion of the new school, proposed open spaces, village centre, and enhancements to existing community facilities will collectively establish a walkable neighbourhood that naturally encourages active travel. Safe, direct, and well-lit pedestrian and cycle routes will ensure that children and parents can access the school comfortably and securely, supporting a long-term shift towards active travel for everyday journeys.

The provision of open spaces and green infrastructure further strengthens this shift by creating attractive walking and cycling routes that connect homes with key facilities. These open spaces provide both recreational opportunities and movement corridors, encouraging residents to integrate active travel into daily life. The character and amenity of these routes, enhanced by natural surveillance, wayfinding, and landscaping will also help to encourage active travel.

The proposed village centre reinforces this by placing day-to-day services, such as local shops, cafés, and community spaces, within easy reach. Enhancements to existing community facilities, including upgraded footpaths, improved accessibility, and strengthened connections to residential areas, further widen the range of destinations that can be easily reached without a car. Together, these interventions support behavioural change by creating a legible network that prioritises active modes, reduces reliance on private car travel, and improves health, wellbeing, and social interaction across the community.

Subject to conditions and a supporting S106 package, officers consider that the scheme adequately addresses ATE's concerns. The proposals, therefore, comply with relevant national and local policy.

Summary of Highways

The proposed development has been assessed against the relevant Local Plan policies and the NPPF, and the supporting information demonstrates that it can be delivered without resulting in an unacceptable impact on highway safety or creating severe residual cumulative effects on either the local or strategic road network taking into account all reasonable future scenarios. The scheme would expand the village to a scale capable of supporting a wider range of local services, including a new primary school, commercial space, play areas and public open space and is supported by a comprehensive package of access improvements, upgraded footway, cycle links and Public Rights of Way improvements. Junction assessments confirm that surrounding local junctions will continue to operate within capacity, while

strategic modelling identifies that required mitigation at Four Elms and Sans Pareil roundabouts is embedded within the Local Plan transport strategy, with proportionate S106 contributions from the development secured to help fund these improvements. The submitted Transport Assessment, subsequent addenda and supporting Travel Plans demonstrate that the scheme promotes sustainable travel and reduces reliance on the private car. National Highways has also confirmed that, subject to conditions, the development would not have a severe impact on the Strategic Road Network.

Overall, with the recommended conditions and S106 obligations secured, the proposal is considered acceptable in transport and highway terms and compliant with regard to Policies T1, T2, T3, T4, T13 and T14 of the Local Plan, Policies SA9, DM15 and DM18 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 110, 115 and 116 of the NPPF.

Climate Change and Energy Efficiency

The application has been submitted with a Climate Change and Energy Efficiency Statement (dated May 2025). Through a combination of fabric-first measures and the installation of air-source heat pump technology, the scheme could deliver an approx. 58.5% reduction in carbon dioxide emissions compared with the Part L: 2021 baseline. In this way, the proposal responds positively and directly to the declared Climate Emergency. The sustainability strategy for the development is founded on the following core principles:

- Make efficient use of land;
- Mitigating the risk of surface water flooding through the employment of sustainable drainage features;
- Minimising internal water consumption to 105 litres per person per day.
- Incorporating low-impact materials, according to the BRE Green Guide to Specification;
- Minimising waste production during construction and maximise the proportion of waste to be diverted from landfill;
- Incorporating measures to improve Site biodiversity, including native hedgerow and tree planting;
- Ensuring land, noise and water pollution are minimised as far as possible.
- Minimising energy demand through the specification of low U-values, low air permeability and low thermal bridging to reduce heat loss;
- Be fossil fuel free, utilising air source heat pump (ASHP) technology to serve the space and water heating demands of the proposed dwellings;
- Achieving an approximate 58.5% reduction in CO₂ emissions, following the Energy Hierarchy methodology;
- The use of locally sourced materials will be prioritised wherever possible to reduce the impacts associated with the transportation of materials;
- During detailed design of the building fabric, consideration will be given to minimising the environmental impact of materials, by selecting non-toxic and robust materials to ensure longevity and a minimal impact on the health of occupants;

- Timber will be selected and purchased in consideration of sustainability certification. It is intended that all structural timber elements along with any timber used for temporary uses, such as scaffolding, will be sustainably sourced, e.g. from FSC and/or PEFC sources;
- The dwellings' facades will have a balanced amount of glazing to mitigate direct solar heat gain whilst optimising daylight penetration;
- Best practice measures, implemented as part of a Construction Environmental Management Plan (CEMP), to mitigate the impacts of construction-related dust and emissions;
- Low energy LED lighting will be installed throughout the residential units.

Further details of these measures will be requested as a condition in accordance with Policy DM6 of Emerging Local Plan and paragraphs 161 and 164 of the NPPF.

S106 Matters

The Community Infrastructure Levy Regulations 2010 provide that in relation to any decision on whether or not to grant planning permission to be made after 6 April 2010, a planning obligation (S106 agreement) may only be taken into account if the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

The obligations proposed comply with these tests because they have been calculated based on the quantum and location of the proposal and are directly related to the development.

The following contributions are sought in accordance with Medway Council's Developer Contributions Guide:

- i) 174,504.80 to improve equipment and facilities at Medway Mobile Libraries and/or the local history library at Medway Archives Centre and/or libraries in the vicinity.
- ii) £191,398.40 towards the provision of enhancements of community facilities within High Halstow to benefit the local community and residents of the development including but not limited to upgrades to the existing cricket pavilion, toilet block and village hall.
- iii) £256,492.40 towards Designated Habitats Mitigation.
- iv) £81,806.40 to support youth development and youth provision within the local vicinity.
- v) £281,055.60 towards improved civic space and gateways to High Halstow (including but not limited to greening, bollards, seating, lighting, paving, wayfinding and signage).

- vi) £180,758.40 towards the improvement and promotion of waste and recycling services serving the development.
- vii) £254,318.80 towards enhancements to existing and new sports and leisure provision within High Halstow including but not limited to the purchase of additional land to improve existing sports provision within the village, upgrades to the existing cricket pavilion, toilets and village hall and upgrades to existing and new football pitches at High Halstow playing field and Deangate Sports Ground.
- xvii) £57,000 towards improvements to signage/information and any relevant surface improvements, to the nearby public rights of way. Including new surfacing, seating, lighting, signage and associated legal costs where applicable.
- viii) £2,042,211.20 towards the creation of additional capacity in social care, primary care and community care required as a result of the increase in housing and resulting patient registration.
- Social Care - £218,211.20
 - Health Primary Care - £1,520,000
 - Health Community Care - £304,000
- ix) £11,465,701.11 towards delivering a Two Form Entry Primary School, including land transfer and measures to ensure vehicular and pedestrian access up to the site boundary with the school along with the necessary services.
- x) £6,787,120.00 towards strategic highway mitigation including but not limited to improvements to Four Elms, Sans Pareil, Main Road, Ropers Lane roundabouts and a wider sustainable transport package.
- xi) £859,560.00 towards improvements to improving existing open space provision and equipment within High Halstow including but not limited to the existing MUGA, Skate Park, football pitches, cricket pavilion, village hall and or towards the purchase of additional land to improve existing sports provision within the village.
- xii) £1,278,099.60 towards a Strategic Environmental Mitigation Strategy (SEMS) to would include the Northward Hill SSSI Mitigation and other identified sites.
- xiii) 25% of all housing to be provided as affordable housing.
- xiv) Obligations to secure further details of the proposed off-site highways works and PRow Improvements.

Presumption in Favour of Sustainable development and the Overall Planning Balance (Having Regard to the Council's Position on its Five-Year Land Supply).

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

The proposal represents a significant development on a greenfield site outside the settlement boundary of High Halstow. As such, it conflicts with the spatial strategy of the adopted Medway Local Plan (2003), including Policies BNE25 and H11, which collectively seek to restrict development in the countryside unless specific exceptions are met, ensure that development maintains or enhances the character, amenity and functioning of the countryside, and limit new housing in rural areas to sites allocated for that purpose or where an exceptional justification can be demonstrated. The scheme also conflicts with paragraph 187 of the NPPF, by resulting in the loss of open countryside and approximately 40.6ha of Best and Most Versatile (BMV) agricultural land and by introducing a substantial degree of urbanising change to an open landscape and when viewed from the wider landscape and Prow's.

There would also have been an identified conflict with Policy BNE48 of the Local Plan, which sought to protect Best and Most Versatile (BMV) agricultural land from loss. However, Policy BNE48 was not "saved" under the transitional provisions of the Planning and Compulsory Purchase Act 2004 and its associated Saving Directions, meaning its lifespan was not extended beyond the initial three-year post-adoption period. Consequently, Policy BNE48 no longer forms part of the Development Plan and cannot be afforded weight in the determination of this application.

Notwithstanding this, the policy remains consistent with paragraph 187 of the NPPF, which is still a relevant consideration and has been assessed earlier in this report.

While mitigation avoids significant ecological harm, the scheme would still result in the loss of foraging habitat for farmland birds such as Skylark and Corn Bunting, increased recreational pressure requiring mitigation at Northward Hill SSSI, and some hedgerow and tree removal to provide access. In addition, although compliant buffers and protective measures reduce the effects on Fisher's Wood Ancient Woodland, a degree of residual harm would arise from increased urban influence adjoining this irreplaceable habitat.

However, the Council cannot currently demonstrate a five-year supply of deliverable housing sites as required by paragraph 78 of the NPPF (currently at approx. 3 years), and, therefore, the most relevant policies relating to the supply of housing are considered out-of-date. In such circumstances, paragraph 11(d) of the NPPF is engaged, requiring that planning permission be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole.

However, simply because the presumption in favour of sustainable development has been engaged, that does not mean that development plan policies relevant for the supply of housing should be ignored. Rather it is for the decision maker to decide how much weight should be afforded to them. Given that Medway's housing land

supply shortfall is sizeable, it is considered that **only limited weight** can be afforded to policy BNE25 and greater weight should be attached to the presumption in favour of sustainable development.

In assessing the proposed development against the policies in the NPPF as a whole, as well as relevant Local Plan policies, the NPPF indicates that there are three dimensions to sustainable development: economic, social and environmental. It is, therefore, appropriate to balance the assessment of the development as set out above, against the Local Plan policies and policies in the NPPF in these terms and unless there are any adverse impacts that would significantly and demonstrably outweigh the benefits, of doing so, planning permission should be granted.

Economic

The new residents will generate more demand for local services and facilities, and this would contribute to boosting the local economy and vitality of the surrounding area. The development would also boost the local economy in the form of direct, indirect and induced jobs from the construction of the development and within the proposed Local Centre and School once operational. As these benefits would be both short-and long-term, **moderate positive weight** is given to this.

The planning obligations set out in the s106 include a range of financial contributions to make the proposal acceptable. These financial contributions are intended to mitigate the effects of the development and render it acceptable in planning terms. Accordingly, **neutral weight** is attributed to this. In addition, and although Council Tax receipts would be created for Medway, they are not benefits, as they are collected or paid to mitigate the additional demand that the new homes would bring on services that Medway provides. These matters, therefore, attract **neutral weight**.

Social

The development would deliver up to 760 new dwellings towards housing land supply, of which 25% would be affordable dwellings (190) contributing to the identified need in the Medway area at a time when delivery is well below the annual requirement. It is anticipated that approximately 50-60 homes a year will be delivered over approximately a 14-year build-out programme. The proposal would, therefore, contribute significantly to the number of dwellings delivered in Medway in the next five years but only by a proportionate amount because not all the proposed dwellings would be delivered in this timeframe. Overall, the proposal would also provide a suitable mix of house types and sizes to reflect what is required locally. The proposal would, therefore, make a meaningful contribution (in accordance with the direction of travel identified in the submitted Local Plan) to the supply of housing in the forms identified and help address the existing shortfalls. Given the quantum of development involved, very **substantial positive weight** is attached to the provision of market and affordable housing.

Upgrades to the existing PRow through to High Halstow and the proposed footway improvements along Christmas Lane and Britannia Road would also promote walking and cycling and provide an alternative to the private vehicle. However, these

measures are largely mitigation associated with the delivery of housing in a countryside location. As such this would carry **moderate weight**.

The proposal is also designed with generously sized plots, and, for the majority of house types, the internal layout would readily facilitate home working. This contributes positively to the health and wellbeing of future occupiers by supporting flexible living arrangements. However, only **limited weight** is afforded to this benefit as it would primarily be experienced by the occupiers of the development itself, rather than the wider community.

The proposal would also deliver serviced land for a new, modern 2FE Primary School, which would be transferred to the Council, with its construction funded through S106 contributions. The school would provide capacity for approximately 420 pupils, including the relocation of the existing High Halstow Primary Academy, thereby avoiding additional pressure on existing education facilities. By meeting the needs of both new and existing residents and supporting sustainable patterns of growth, the provision of the new school represents a valuable benefit. Although the need for a one-form entry primary school is generated by the development and consequently the new school would mitigate some of its impacts, the provision of this facility, which would also benefit the existing community including through a community use agreement relating to facilities within the school and the multi-use games area, still attracts **significant positive weight** in the overall planning balance.

The proposal also includes the provision of a new local centre, incorporating opportunities for convenience retail, community uses and active frontages, thereby improving access to day-to-day services and facilities for both existing and new residents and supporting the creation of a more sustainable and well-connected neighbourhood. This would carry **moderate positive weight**.

Environmental

The proposed development will incorporate a high level of energy efficiency through a fabric-first approach, and all dwellings would be equipped with electric vehicle charging points. The Climate Change Statement submitted alongside the application states that climate and energy measures would achieve a circa 58.5% CO₂ reduction from 2021 Part L baseline. While such measures are increasingly common in modern residential schemes, they nonetheless represent a clear environmental benefit and contribute positively to the scheme's overall sustainability credentials. These features are, therefore, afforded **moderate weight** in the planning balance.

There is no statutory requirement to deliver Biodiversity Net Gain (BNG) in this case, as the planning application was submitted prior to 12 February 2024, when mandatory BNG requirements came into force. Nonetheless, Local Plan Policy BNE25 requires new development to conserve and enhance the natural environment, while paragraph 193(d) of the NPPF seeks to ensure that proposals secure measurable net gains for biodiversity. In addition, Policy S2 of the Regulation 22 Medway Local Plan 2041 requires development to achieve a minimum 10% BNG, consistent with national legislation. A BNG Metric and accompanying Assessment have been submitted with the application, demonstrating that the scheme would

deliver an uplift of 11.14% in habitat units and 44.23% in hedgerow units, thereby exceeding emerging policy requirements and contributing positively to local biodiversity enhancement and the wider national objective of reversing biodiversity decline. However, as the site currently comprises undeveloped greenfield land of relatively low ecological complexity, the net gain achieved is afforded **limited positive weight** in the planning balance.

The proposed development would deliver approximately 14 hectares of open space, including play areas, SuDS features and green corridors, all of which would be accessible to the wider community through enhanced connections to the existing village. This would provide meaningful benefits for health, wellbeing and community cohesion. In addition, the scheme incorporates strengthened woodland buffers, new habitat creation and the cessation of agricultural activity adjacent to the ancient woodland, thereby reducing chemical inputs and improving ecological conditions along the woodland edge. However, as these measures function primarily as mitigation and largely benefit future occupiers of the development itself, they are afforded **limited weight** in the overall planning balance. Further, large areas of landscaping are necessary to achieve an appropriate balance between the amount of built form proposed and a visually attractive development that is sympathetic to local character whilst making effective use of land. The proposal would result in **limited negative weight** given the loss of BMV.

It is also noted that the proposed upgrades to the PRow network, alongside improvements to the footway along Christmas Lane, would enhance wider opportunities for walking and cycling beyond the site boundary. The site is served by nearby bus services, and the primary routes through the development have been designed to accommodate future bus provision, thereby supporting a shift towards more sustainable modes of travel. While the wider infrastructure contributions are necessary to mitigate the proposal's impacts on the road network, they would also deliver broader benefits to the existing community and future development in the area overtime. As such, these works attract **moderate positive weight** in the planning balance, reflecting their wider strategic value.

Weight of the Emerging Local Plan

The site (under ID HHH26) is allocated for development in the Regulation 22 Medway Local Plan 2041, recognising its role in meeting housing needs and delivering strategic growth on the Hoo Peninsula. Therefore, by allocating a greenfield site in the countryside for development within the emerging Local Plan, the Council inevitably accepts that a degree of landscape change will occur. Such allocations inherently require the transition of open rural land to built form, and the associated effects on openness, character and visual amenity are an anticipated and unavoidable consequence of meeting strategic housing needs. The process of allocation, therefore, recognises that, while landscape harm will arise, this must be balanced against the wider requirement to plan positively for growth and to identify deliverable sites capable of supporting sustainable expansion in accordance with national planning policy.

In this regard, and while the emerging plan is not yet adopted, it is at an advanced stage (submitted for examination, December 2025). In accordance with NPPF

paragraph 49, **moderate weight** can appropriately be given to this allocation. This weighs positively in favour of the proposal, particularly as the site forms a key part of the Council's spatial strategy for meeting identified housing need.

Prematurity

The issue of prematurity is a material planning consideration that should be considered in the Planning Balance.

Paragraph 49 of the NPPF states

“Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

Paragraph 50 of the NPPF then goes on to consider prematurity:

“However, in the context of the NPPF – an in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) The development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about scale, location or phasing of new development that are central to the emerging plan: and
- b) The emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”

Paragraph 51 of the NPPF further considers prematurity:

“Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan making process”.

The Council has an obligation to determine a validly submitted application in accordance with the statutory framework. The issue of prematurity is one the LPA

should consider in determining submitted applications of scale which are both in accordance with the emerging Local Plan and not in accordance with the emerging Local Plan.

Having regard to the above paragraphs in the NPPF the factor which indicates less weight to emerging Local Plan policy SA9 is that the examination process of the Local Plan is at an early stage and Policy SA9 is subject to unresolved objections. Conversely, the factor that indicates greater weight should be given to the emerging Plan and policy, is that it makes provision for Local Housing need consistent with the NPPF.

Paragraph 50 sets out the 2 circumstances which BOTH must apply for an application to be considered premature. The second is that the emerging plan is at an advanced stage but not yet formally part of the Development Plan. This is correct.

However, the first part states that “the development is so substantial that to grant permission would undermine the plan making process by predetermining decisions about scale, location or phasing of new development that are central to an emerging plan.” In this respect the scale of the development at up to 760 dwellings with associated facilities must be considered in the context of a housing requirement of 24,540 over the Plan period. In this context the proposal cannot be considered as substantial.

Conclusion on Planning Balance and Reasons for Approval

The planning system should be genuinely plan-led. The development plan directs development to suitable locations to enable strategic growth and development to help meet the objectively assessed needs of the Council by providing for the development of housing, employment, retail and other necessary development. The adopted Local Plan is of significant age, and for the reasons outlined earlier within the report, its spatial strategy is not keeping pace with the housing needs of the district. Indeed, the proposal would conflict with the spatial strategy of the adopted Local Plan, including Policies BNE25 and H11, which collectively seek to restrict development in the countryside. Further, in developing the land for housing, the proposal would result in the loss of countryside and BMV even though the site is part of a proposed allocation in the Regulation 22 Medway Local Plan 2041.

There would be no unacceptable harm to designated heritage assets or in respect of flood risk. Furthermore, with the implementation of the proposed mitigation measures, the development would not give rise to any unacceptable impacts on habitat sites or Sites of Special Scientific Interest (SSSIs). In addition, the proposal would deliver a range of much-needed homes in an accessible location where safe and suitable access can be achieved for all, with appropriate mitigation secured to address its highway impacts. Furthermore, the development is capable of responding appropriately to local character through its layout, form, density, scale and appearance, achieving a well-designed place that incorporates appropriate landscaping, connections and green corridors while making effective use of land.

Overall, the proposal gives rise to a number of benefits, as well as identified harms. Taken together, those harms mean that the development conflicts with the adopted

Development Plan when read as a whole. However, when applying the tilted balance under paragraph 11(d) of the NPPF, the adverse impacts of granting permission would not significantly and demonstrably outweigh the scheme's benefits when assessed against the policies of the NPPF taken as a whole. Material considerations, therefore, indicate that planning permission should be granted other than in accordance with the Development Plan, and accordingly, planning permission should be approved.

The application would normally be determined under delegated powers but is being referred for Committee determination due to the significance of the proposal and the number of objections received contrary to this recommendation.

Background Papers

The relevant background papers relating to the individual applications comprise: the applications and all supporting documentation submitted therewith; and items identified in any Relevant History and Representations section within the report.

Any information referred to is available for inspection in the Planning Offices of Medway Council at Gun Wharf, Dock Road, Chatham ME4 4TR and here <http://publicaccess1.medway.gov.uk/online-applications/>