

MC/24/2022

Date Received: 3 October 2024
Location: Land west of Hoo St Werburgh, Rochester, Kent
Proposal: Outline planning application (with all matters reserved except access) for the construction of up to 450 dwellings, commercial floorspace (up to 500sqm), community use building (up to 500sqm), associated public open space, landscaping, outdoor sports facilities, drainage and earthworks.
Applicant: Taylor Wimpey Strategic Land
C/O Agent
Agent: Stantec
Mr William Omoma
2 Kings Hill Avenue
Kings Hill
West Malling
ME19 4AQ
Ward: Strood Rural
Case Officer: Madeline Mead
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 8 April 2026.

Recommendation - Refusal

- 1 Although the principle of residential-led development on the site is supported, the proposal fails to provide a sufficient and effective landscape buffer capable of functioning as part of a strategic landscape corridor and would also adversely and unnecessarily exacerbate landscape and visual impacts as a result of developing this site. The proposal would result in the perceived coalescence of Hoo and Chattenden, and as a result would not successfully maintain the separate identity and character of those settlements. As such, the Development would conflict with the underlying objectives of Policy BNE25 of the adopted Local Plan; Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023-2040; Draft Policies SA8, and S4 of the Regulation 22 Medway Local Plan 2041.

It should be noted that the applicant has appealed to the Planning Inspectorate against the Council's non-determination of this application. Accordingly, this scheme is being considered at committee to enable the Council to confirm what would have been the decision had they been able to determine the application.

The application would have been recommended for refusal for the following reason:

Although the principle of residential-led development on the site is supported, the proposal fails to provide a sufficient and effective landscape buffer capable of functioning as part of a strategic landscape corridor and would also adversely and unnecessarily exacerbate landscape and visual impacts as a result of developing this site. The proposal would result in the perceived coalescence of Hoo and Chattenden, and as a result would not successfully maintain the separate identity and character of those settlements. As such, the Development would conflict with the underlying objectives of Policy BNE25 of the adopted Local Plan; Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023-2040; Draft Policies SA8, and S4 of the Regulation 22 Medway Local Plan 2041.

For the reasons for this recommendation for refusal please see Planning Appraisal Section and Conclusions at the end of this report.

Proposal

This is an outline planning application with some matters reserved (appearance, landscaping, layout and scale) for the construction of up to 450 dwellings, commercial floorspace (up to 500sqm), community use building (up to 500sqm), associated public open space, landscaping, outdoor sports facilities, drainage and earthworks.

The drawings identified below have been submitted with the application and are to be determined as part of the application:

Site Location Plan - 333100395 RG-M-06 Rev A
Parameter Plan - 333100395 LN-LP-11 Rev D
Proposed Site Access – Primary Access 333100395 001 Rev P02
Footway Improvements on Main Road - 333100395 002 Rev P02
Proposed Highways Mitigation at Peninsular Way / Main Road Roundabout - 333100395 003 Rev P03
Proposed Highways Mitigation at Four Elms Roundabout - 333100395 004 Rev P02
Proposed Access on Ratcliffe Highway - 333100395 005 Rev P02
Proposed Site Access Entry Path Radius - 333100395 006 Rev P03
Proposed Site Access Forward Visibility - 333100395 007 Rev P02
Proposed Site Access Refuse Swept Path Analysis - 333100395 008 Rev P02
Proposed Highways Mitigation at A228 Peninsula Way / Main Road Roundabout – Entry Path Radius - 333100395 010 Rev P02
Proposed Highways Mitigation at A228 Peninsula Way / Main Road Roundabout – Swept Path Analysis - 333100395 011 Rev P02

Illustrative plans have also been submitted with the application, however, these plans are not for determination as part of the application.

Hoo St Werburgh is a medium-sized settlement situated within the southern part of the Hoo Peninsula, approximately 1km to the north of the estuary of the River

Medway. Land use surrounding the settlement predominantly comprises agricultural fields, with occasional clusters of farm and residential properties. To the south west is the smaller settlement of Chattenden, which is split by the A228. The area of Chattenden to the north of the A228 leads into the MoD landholding at Lodge Hill, the built-up area of which is separated from Hoo St Werburgh by the A228 and the southern slopes of Deangate Ridge.

The site itself comprises approximately 31.12ha of greenfield land located at the south western edge of the settlement of Hoo and is currently in agricultural use.

The illustrative layout, drawing number CB_83_308_904, shows the development with the spine road leading off of the Main Road Hoo roundabout and going through the site to link into the future adjacent development site to the east. Another main road would come off of the spine road and provide access onto Ratcliffe Highway. Smaller roads would lead off of the main roads to serve the residential /commercial / community / sports areas.

The illustrative layout, shows entering from Main Road, would be residential development on either side of the road and a sports area with car parking to the southwestern most point of the site. Further north along the road would be the local centre which would provide up to 500sqm of commercial floorspace and up to 500sqm for a community use building, along with allotments at the edge of the local centre with Ratcliffe Highway. Following on from this area would be the remaining residential development.

The site rises in land level from south to north, being approx. 30m in height difference from the south to the north. The parameter plan submitted with the application shows the built form of development on the site being up to 3 storeys in height from the south to the north of the site with an area just before the adjacent development site to the east and the eastern most part of the site being 2 storeys in height. The heights are reflective of the land levels which run north to south across the site with the north being the highest level.

The illustrative layout shows how the dwellings could be laid out so that they would be fronting onto the main road and smaller roads to provide active frontages and to achieve 450 dwellings on the site.

The Design and Access statement outlines that the proposed development will provide approx. 16.60 hectares of open space across the site, including attenuation basins, play areas and informal and formal open space. Allotments are also proposed within this area.

Footpath linkages are proposed around the site and potentially linking into the future development site to the east of this site. Works are proposed to an existing footpath that would lead down to Main Road between the Hundred of Hoo Primary School and the Hundred of Hoo Academy, to make this pedestrian link more accessible.

Site Area/Density

Whole Site

Site Area: 31.12 hectares (76.89 acres)
Site Density: 14.46 dph (5.85 dpa)

Outline Residential Site ONLY (minus GI and open space)

Site Area: 11.19 hectares (17 acres)
Site Density: 40.2 dph (26.4 dpa)

Relevant Planning History

- MC/18/2612 Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - request for a Scoping Opinion as to the content of the Environmental Impact Assessment for an outline planning application (with all matters reserved, other than access) for the construction of up to 550 dwellings including affordable housing, a potential primary school extension and public open space, together with a new access, parking, infrastructure, landscaping, attenuation and earthworks.
Decision: EIA required
Decided: 12 November 2018
- MC/14/3405 Outline application with some matters reserved (appearance, landscaping, layout and scale) for the construction of up to 475 dwellings including affordable housing, commercial floorspace (Use Classes A1/A3/A5, up to 200sqm), sports pavilion (Use Class D2, up to 200sqm), associated public open space, multi-functional green infrastructure, outdoor sports facilities, access, parking, infrastructure, landscaping, attenuation and earthworks.
Decision: Refused
Decided: 2 April 2015
Appeal decision: Dismissed
Appeal decided: 6 September 2016
- MC/14/1391 Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2011 - request for a scoping opinion to inform an Environmental Statement to accompany an application for an outline application for the construction of up to 500 dwellings, including affordable housing, commercial floorspace (use classes A1/A3/A5 - up to 200sqm) associated public open space, multi functional green infrastructure, outdoor sports facilities and pavilion, access, parking, infrastructure, landscaping, attenuation and earthworks.
Decision: EIA required
Decided: 25 June 2014

NB: it may be relevant to understand approvals in the locality to this scheme. These are listed below:

MC/23/1934	<p>Land at Ratcliffe Highway, Hoo St Werburgh</p> <p>Outline planning application (all matters reserved except for access) for the erection of up to 240 residential dwellings, including 25% affordable housing, together with a new vehicular access point from Ratcliffe Highway, open space, landscaping and associated works.</p> <p>Decision: Pending</p>
MC/23/2597	<p>Land at Former Deangate Ridge Golf Club</p> <p>Change of use from former golf course to community park comprising works to existing access and car park, cycle parking, formation of footpaths, landscaping, tree/scrub planting, boundary treatments, site interpretation and benches with associated works.</p> <p>Decision: Approved with Conditions</p> <p>Date: 16 February 2024</p>

Representations

The application has been advertised on site, in the press and by individual neighbour notification to the owners and occupiers of neighbouring properties. Rochester Airport Limited, Health and Safety Executive, Active Travel England, Southern Water, National Highways, Lower Medway Drainage Board, Sports England, Active Travel England, KCC Biodiversity, KCC Archaeology, UK Power Networks, Southern Gas Networks, Environment Agency, Royal Society for Protection of Birds, Natural England, Kent Wildlife Trust, Woodland Trust, Kent Police and Hoo St Werburgh Parish Council have also been consulted.

63 letters of representations have been received with the following comments:

- Impact on healthcare services which are already stretched;
- Impact on education facilities which are at capacity;
- Impact on policing services and increase in crime;
- Impact on fire services;
- Poor public transport links including rail;
- Poor road conditions;
- Increase in congestion and parking difficulties;
- Link to highway network at the roundabout on Main Road Hoo at its intersection with Main Road Chattenden may cause congestion;
- Poor road safety for pedestrians on A228 near Chattenden School;
- Conflict between this application and MC/23/1934 in regard to Spine Road and if the road will be bus only or not;
- Diversion of buses away from the centre of Hoo;
- Increase in air pollution;
- Increase in noise pollution;
- Increase in light pollution;
- Risk of creating urban heat island;
- Loss of green space;
- Impact on biodiversity and wildlife;

- Loss of agricultural land (BMV land);
- Impact on birdlife;
- Loss of settlement separation and green corridor;
- Loss of green buffer;
- Lack of shops;
- No investment in current facilities such as Deangate running track and Hoo leisure centre;
- No consideration for commercial space or community space;
- Proposed facilities do not integrate with village or existing facilities well;
- The proposal risks creating a fragmented community rather than a cohesive one;
- Strain on water drainage, waste and flooding;
- Unsustainable location;
- Settlements will merge;
- Conflict with the Neighbourhood Plan;
- Overdevelopment of village;
- Housing is unaffordable;
- Cumulative effects of development across Hoo;
- Impact on neighbouring outlook;
- Damage to the character of the countryside;
- Diminish quality of life and community wellbeing for current and future residents;
- Scale and design out of character with the existing neighbourhood;
- Diversion of bus away from where current users live and travel.

Leigh Academies Trust have made the following comments:

- The proposed pedestrian walkway link will likely benefit parents and students by providing a safe and accessible route to school;
- Existing boundaries to Hundred of Hoo land along the east and west sides of the trackway should have a minimum of 2m high anti climb fencing along the full length on both sides to ensure security and safeguarding of children;
- The two existing locations where we cross the trackway (to access sports field and the Primary Academy) should have lockable gates controlled by LAT;
- The two existing rights of access across the trackway must be legally retained for the purposes of accessing the playing field and primary site;
- Responsibility for the ongoing maintenance of the trackway (upkeep lighting security etc.) should be clearly determined;
- The junction of the trackway and access to the primary academy will require a full redesign and alteration to ensure the security of site boundaries for both academies is retained;
- The car drop off facility provided by Medway Council as part of the two phases of construction of the primary site has proven ineffective, causes significant traffic delays on Main Road in Hoo, and does not work.

Councillor Pearce has made the following comments:

- Local primary schools are at capacity and will exceed capacity in the very near future, leading to residents using unsustainable modes of transport in order for primary school age children to attend school;
- The proposed pedestrian/cycling access running between the Hundred of Hoo primary and secondary academies is severed by security fencing and, therefore, this specific footpath/cycling access cannot be used to demonstrate sustainable modes of transport and permeability/access with the existing settlement of Hoo;
- 2014 Transport assessment (MC/14/3405 refused and dismissed at appeal) included Hoo to London coach service which has since been withdrawn. This drop in sustainability has not been reflected in the latest transport assessment;
- Transport assessment is too optimistic and does not include latest census data.

Southern Water have undertaken a desktop study of the impact from the additional foul sewerage flows from the proposed development will have on the existing public sewer network. 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.

National Highways have concerns 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, they recommended that a condition in respect to a Construction Environmental Management Plan (CEMP) be imposed and with this condition 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.

The Lower Medway Drainage Board have advised that the site is outside of their district but is within a river catchment that drains into their district. The Board welcomes that the design is adhering to a sequential approach with respect to building placement in the lowest flood risk areas, including no proposed built development encroaching into the surface water flood flow routes, except for the proposed bridge, which incorporates a raised soffit to maintain flood flow conveyance. The Board welcomes the proposed surface water attenuation and restricted discharge. The 2015 Non-statutory Technical Standards for Sustainable Drainage Systems have been superseded by the new National Standards for Sustainable Drainage Systems, which introduce updated requirements and expectations for the design and assessment of SuDS. The 2025 National Standards broaden this approach by treating SuDS as a multifunctional system that also delivers water quality, biodiversity, and placemaking benefits. The new standards move away from reliance on a single 1% AEP, 6-hour volume test and instead require a broader demonstration that runoff volumes are effectively managed across frequent, design, and extreme rainfall events. Restricting discharge to a fixed rate alone does not, in itself, provide this demonstration. At this stage, and notwithstanding the outline nature of the application, the overall runoff volume

response of the development will need to be appropriately managed. Further clarification is, therefore, required at the detailed design stage to confirm how runoff volumes will be managed in accordance with the National Standards, and the Board would suggest that this matter is addressed as part of the detailed surface water drainage scheme secured by condition.

In addition, the National Standards require that any part of the development area which may contribute runoff to the surface water drainage system during an extreme rainfall event is appropriately represented within the post-development runoff modelling, unless it can be demonstrated that runoff from such areas is fully intercepted or managed outside the system. Where runoff from these areas is restricted to the SWMP discharge rate, this directly informs the required attenuation storage volumes and system drawdown behaviour, which have not yet been reported and should, therefore, be confirmed at the detailed design stage. While surface water on-site storage is provided through attenuation basins, the standards place greater emphasis on interception and reuse of rainfall, which may not have been fully considered, given that the Flood Risk Assessment was prepared prior to the new standards. As such, there are likely to be further opportunities, and these will reduce reliance on the end-of-pipe drainage solution. With respect to the surface water drainage modelling, this should be updated to use the latest available FEH rainfall data (FEH22), rather than the earlier FEH13 dataset, to ensure that the assessment reflects current guidance and the most up-to-date understanding of rainfall characteristics. The Board welcomes the inclusion of a 10% allowance for urban creep; however, the submitted information could benefit from greater clarity in how this allowance has been applied. It would, therefore, be helpful for this to be clearly and consistently set out at the detailed design stage, noting that impermeable area assumptions influence runoff volumes and storage requirements. The proposed discharge of surface water from the development's new impermeable areas to the Hoo Stream, which ultimately drains into the Board's district, is subject to a land drainage consent in line with the Board's byelaws (specifically byelaw 3). They recommend conditions for surface water disposal, maintenance schedule, verification and construction surface water management plan.

Sports England object to the application on the grounds of lack of sporting infrastructure being provided either on and off-site in order to create a sustainable community. The occupiers of the development would generate demand for sporting provision. Therefore, in order to create a sustainable community, there should be either formal sports facilities created on site or provision needs to be made off site.

Active Travel England (ATE) advised that they are not currently in a position to support this application and requested further assessment, evidence and revisions as set out in their response. The applicant has submitted a variety of amendments to the ES chapters and ATE have been reconsulted on this information. To date ATE have not provided any further comments.

KCC Biodiversity advise that they are satisfied that sufficient ecological surveys have been provided with the latest walkover survey conducted May 24 and bird surveys March 25. Further updated species surveys would be required and conditions are recommended.

KCC Archaeology have advised that the Environmental Impact Assessment for Cultural Heritage was supported through the production of a desk-based assessment. The desk-based assessment provides a reasonable account of the archaeological potential of the proposed development. The exception is for the Palaeolithic period which is not adequately considered in the desk-based assessment. They advise that on balance the submitted information provides a fair assessment of the likely impacts arising from the scheme and recommends conditions for further details to be submitted. Subject to conditions they raise no objections.

The Environment Agency have no comments to make.

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. These works must be supervised by an SGN representative. They have also provided advice on building proximity distance, cable crossing, piling/boreholes, vehicle crossing and restrictions within document SGN/WI/SW/2.

The Health and Safety Executive (HSE) has advised that the proposed development site lies within the HSE consultation distance of two major accident hazard pipelines and their response has been considered using HSE's land use planning (LUP) methodology, taking account of the major accident hazard pipelines in order to determine HSE's advice. The HSE has carried out a quantified risk assessment on each of the pipelines, based on the information contained in the notifications submitted in accordance with the Pipelines Safety Regulations 1996 to establish a consultation distance (CD) around each pipeline.

They have advised that there is only landscaping proposed within the inner consultation zones for both pipelines and do not advise against landscaping within the inner zone as long as there are no facilities provided which would encourage people to congregate such as play areas and football pitches. Within the middle zone there are some residential dwellings proposed and would not advise against residential dwellings located within the middle zone as long as there were no more than 30 dwellings proposed in total and they had a housing density of less than 40 units per hectare. They also do not advise against any number of dwelling units proposed in the outer zone.

Overall, the HSE do not advise on safety grounds against the granting of planning permission as long as there are no more than 30 dwelling units and at a density of less than 40 units per hectare located within the middle consultation zones.

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).

The RSPB have advised that the site lies within close proximity to a national important area for Nightingales (Red listed Birds of Conservation Concern). While this site falls outside 400 metres of Chattenden Woods and Lodge Hill Site of Special

Scientific Interest (SSSI) where development is considered unmitigable, they consider that this proposed development still has the potential to have indirect impacts as a result of recreational pressure and suggest that the opportunity is taken to highlight walking routes that lead away from the site, towards less ecologically sensitive locations. They suggest that relevant green recreational infrastructure is provided within the development site which is attractive to dog walkers, to help reduce possible recreational impacts on the SSSI and its nationally important Nightingale population. They also advise of a potential opportunity to engage new residents about the sensitivity and importance of the nearby Nightingale population, for example through signage and suggest providing practical protection from similar recreational disturbance for any new Skylark plots, ponds, and other key habitat features.

Kent Wildlife Trust have concerns around the impact of domestic pets and recreational disturbance on the effectiveness of the proposed mitigation measures.

They advise the following:

The proposed development would likely result in a significant increase in cat ownership within the area. The site supports species which have suffered substantial population declines, including ground nesting birds such as snipe, woodcock, skylark and nightingale as well as mammals such as water vole. These species, already in a precarious situation, could be detrimentally impacted by cat predation. It is noted that additional planting is proposed alongside measures such as information packs and advice to use bell collars to reduce predation from cats. While the additional planting will provide some degree of protection there will be a period between residents moving to the site and this planting becoming established. In addition, the other measures are unenforceable and likely to be ineffective as well as difficult to monitor.

It is noted that the Applicants have suggested a monitoring regime and the inclusion of conditions to secure a Landscape and Ecological Management Plan (LEMP) and a Habitat Management and Monitoring Plan (HMMP). The monitoring regime would seek to assess the effectiveness of the proposed mitigation measures and provide recommendations on how they can be improved or amended. This should be secured through the LEMP or HMMP. It is advised that a compensation strategy should also be provided as part of the LEMP or HMMP which details what steps will be put in place to remediate the situation if it is found that the plots are not being utilised. At the point it becomes clear that the plots are not being used a significant area of suitable habitat for skylark and other ground nesting birds will have been permanently lost. We are, therefore, concerned that it will not be possible to implement an effective compensation strategy to address the plots not being utilised.

The impacts from dogs being walked off lead within the site remains a concern and further details should be provided on how this will be managed in a way that benefits wildlife and protects habitats within the wider site. Proposed measures such as the provision of signage and additional buffer planting are noted, however, KWT remain concerned about the impacts of dogs disturbing nesting birds as well as impacts on habitats such as the ponds which support great crested newts (GCN). It is recommended that the use of fencing to ponds is explored along with the creation of 'sacrificial' ponds away from those supporting GCN.

The British Horse Society have commented that the once quiet country lanes have become busier making unsafe environment for vulnerable road users such as pedestrians, cyclists and horse riders. Existing rights of ways, due to building projects, are impossible to access or the building ruining the condition of the paths.

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.

The Dickens Country Protection Society object to the application for the following reasons:

- Site is a prominent hillside between Chattenden and Hoo St Werburgh which contributes to the open character of the area;
- Chattenden has seen significant development, building in Chattenden Lane and south of Broadwood Road;
- Major expansion of Hoo St Werburgh already, development to the west should be resisted;
- Services may not be adequate to support further development.
- Loss of agricultural land;
- Coalescence of adjacent settlements.

Hoo St Werburgh and Chattenden Parish Council request a section 106 contribution of £1.3 million to help mitigate the significant community impact and support delivery of the new community facility project in the parish and object to the application for the following reasons:

- Development of a greenfield site;
- Previous application/appeal dismissed for several reasons;
- Does not meet the requirements of policies HOO4, HOO11, HOO8, HOO6, HOO2, HOO10 of the neighbourhood plan or paragraph 115 of the NPPF;
- Impact on congestion – A228 recognised as over capacity;
- Limited sustainable transport options;
- Capacity of utilities;
- Impact of landscape and biodiversity;
- Unsustainable development which is car dependent;
- Harm from the coalescence of Hoo and Chattenden;
- Loss of agricultural land and harm to rural economy;
- Conservation of protected species has not been addressed;
- Increase in air pollution.

The Independent Group (TIG) have submitted four rebuttals objecting to the application on the grounds of Transport and Access, Landscape and Settlement Separation, Environment and Ecology and Active Travel. A summary of those rebuttals are included below:

Transport and Access

This representation objects on transport and access grounds and provides a rebuttal to documents submitted by the applicant and concludes the following:

- The development would exacerbate an already constrained network that relies heavily on the A228 and critical junctions/roundabouts including Four Elms and A228 Peninsula Way/Main Road Hoo. The applicant's own ES Transport work identifies moderate adverse and significant effects at key junctions before mitigation.
- The previous scheme on the same site by the same applicant was refused and dismissed at appeal, with the Inspector finding the resulting high dependency on car travel to be a significant and enduring harm, rooted in Hoo's reliance on a single road connection and an overloaded Four Elms roundabout. Those core issues remain.
- National Highways maintain a position that (in summary) indicates unresolved concerns on the strategic network/impacts (as set out in their representations).
- Active Travel England issue a deferral: they are not currently able to support the application due to missing/insufficient evidence and requirements around active travel assessment and delivery. This matters because the applicant's "sustainable mode share" case is integral to whether impacts become "severe".
- The Hundred of Hoo Academy / Leigh Academies Trust raise material concerns about traffic, access and safety around the school context. These are directly relevant to access arrangements, trip timing, and local congestion and safety risk.
- The Council's own Strategic Transport Assessment (new Local Plan Regulation 19/22 evidence base) indicates at/over-capacity conditions at key locations (including A228/Main Road Hoo in the modelling outputs). This supports the objection that the network is already constrained and that additional growth materially worsens performance.
- The applicant's bus strategy/deliverability is undermined by (i) Arriva-related constraints noted within the applicant's own reporting and (ii) the acknowledged withdrawal of the £170m HIF project, which materially changes the assumed wider mitigation context.

Landscape and Settlement Separation

This representation objects on landscape and settlement separation grounds and provides a rebuttal to documents submitted by the applicant and concludes the following:

- The application conflicts with the Development Plan because it would cause material harm to the open character and function of the landscape gap between Hoo St Werburgh and Chattenden, contrary to the Hoo St Werburgh & Chattenden Neighbourhood Plan policy protecting the separation and the valued landscape of the Chattenden Valley.
- The applicant's own LVIA baseline acknowledges the very limited remaining separation (approx. 250m physical separation, limited perceptual separation, and no visual separation due to intervisibility). Developing the remaining open land within this "gap" would inevitably erode what little open countryside separation remains, undermining settlement identity and the landscape function of the valley.
- The applicant seeks to downplay coalescence by asserting "little perceived coalescence" and relying on the previous appeal Inspector's view that coalescence harm was "relatively minor". However, the current Development Plan position includes a made Neighbourhood Plan (Sept 2024) with explicit requirements for protecting landscape separation and the Chattenden Valley as a valued landscape. This policy context must be given full weight now.
- The applicant's own appended published landscape evidence identifies the relevant parcels as performing a "valuable anti-coalescent role" and specifically calls for a "substantial swathe of open countryside" to be retained as a strong green buffer between communities. The proposal does not deliver that strategic requirement at the scale needed to avoid harm.
- The LPA previously refused a proposal for the same site and applicant, and it was dismissed on appeal. Where the previous reasons relate to landscape character/appearance and the role of the countryside gap, the current outline scheme still fails to demonstrate that the fundamental harm has been overcome (particularly when judged against the now-adopted neighbourhood plan protections).

Environment and Ecology

This representation objects on environment and ecology grounds and provides a rebuttal to documents submitted by the applicant and concludes the following:

- The site supports ecologically important assemblages (including red-listed and Section 41 species) and is functionally linked to a wider ecological network on the Hoo Peninsula. The evidence base provided confirms the presence of multiple conservation-important species and habitats requiring a genuinely precautionary approach.
- Nightingales are a central constraint. Nightingale territories have been recorded and the site sits in close proximity to Chattenden Woods and Lodge Hill SSSI, a nationally important nightingale breeding area. Both the applicant's own material and consultees identify ongoing sensitivity, including disturbance and predation pathways that are not convincingly resolved at outline stage.

- Mitigation is overly reliant on future conditions, monitoring, and behavioural measures (e.g., resident information packs, signage), despite consultee warnings that key risks (cats/dogs, disturbance, stream integrity) may be unenforceable or ineffective and could lead to irreversible impacts before “adaptive management” can respond.
- Habitats Regulations issues are not “finished” by SAMMS alone. Natural England’s position is “no objection” subject to secured strategic mitigation for recreational pressure, but KCC’s ecological advice identifies a continuing need for additional site-specific mitigation to satisfy HRA requirements. The Council must be satisfied beyond reasonable scientific doubt that adverse effects on integrity are avoided.
- Water environment risk remains material: consultees raise issues about drainage standards, runoff volumes, modelling inputs, construction surface water management, and the sensitivity of the receiving environment (Hoo Stream) including water vole habitat. These are not minor details - they go to whether the development can avoid harm to sensitive ecological receptors.

Active Travel

This representation objects on active travel grounds and provides a rebuttal to documents submitted by the applicant and concludes the following:

- Active Travel England (ATE) has issued a formal “Deferral” and states it is not currently in a position to support the application, citing missing assessment/evidence and the need for revisions and further dialogue. This goes to the heart of whether the site can realistically achieve the level of walking/cycling uptake needed to prevent car-dependency.
- ATE’s key point is that all-day active travel movements are not quantified in the submitted Transport Assessment and Travel Plan; ATE expects multi-modal trip generation across all modes throughout the day, not just peak hours. Without this, there is no robust foundation for “healthy/inclusive” active travel planning.
- ATE also requires clarity and commitment at outline stage on the design and security of key walking/cycling links, including LTN 1/20-compliant design (width/surface/lighting), segregated provision along the spine road (shared-use is not acceptable for a development of this scale), and redesign of the access roundabout to be safe for active travel (potentially a Dutch-style roundabout).
- The applicant’s “sustainable transport” case relies heavily on diverting the Arriva 191 bus service through the new development. This approach risks harming existing users in Hoo village centre by moving one of the core services away from where demand is concentrated and undermines the viability/reliability of the route. These concerns are set out in Cllr. Pearce’s letter (Appendix 1) to Arriva’s Head of Commercial (15 Feb 2026).

- The applicant's own documents contain evidence of Arriva viability and deliverability concerns, including funding uncertainty, the possibility of reduced frequency, potential loss of the Grain extension, and the difficulty of creating amended timetables - plus little slack in the existing timetable (meaning a longer route could require an extra bus).
- As submitted, the application, therefore, fails to demonstrate deliverable active travel infrastructure and deliverable bus improvements that do not disadvantage current users. The proposal conflicts with Neighbourhood Plan Policy HOO11 (Sustainable Transport and Active Travel).

Development Plan

The Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan) and the Hoo St Werburgh and Chattenden Neighbourhood 2023-2040 (NHP). As the NHP was adopted in September 2024 it is, therefore, the most-up-date Development Plan document. The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework 2024 (the NPPF) and are generally considered to conform. Where non-conformity exists, this will be highlighted and addressed in the appraisal section below.

Emerging Local Plan

In addition, the Final draft (Regulation 22) Local Plan - Medway Local Plan 2041 (Emerging Local Plan) 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. This is of particular relevance to this application because the appeal site is included as an allocation for up to 450 homes and supporting commercial (Site HHH8) as part of draft Policy SA8 which includes all proposed site allocations at Hoo St Werburgh and Chattenden. Development of the Appeal Site is identified as Years 1-5, 6-10 of the Plan period.

Planning Appraisal

Screening for Environmental Impact Assessment (EIA)

The EIA Regulations set out which types of development may require an Environmental Impact Assessment ("EIA"). Whilst development types listed in Schedule 1 of the Regulations always require EIA, types listed in Schedule 2 could potentially require EIA where the site is in a "sensitive area" or exceeds one of the relevant criteria or thresholds set out in Schedule 2 and has the potential to result in likely significant environmental effects.

In this case, it is considered that the location, scale and nature of the proposed development, notwithstanding the selection criteria in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, may have the potential to give rise to significant effects on the environment. The proposed development falls within Schedule 2, part 10(b) of the EIA Regulations and is

considered to be an Environmental Impact Assessment (EIA) development, as defined by the EIA Regulations. The planning application is, therefore, accompanied by an Environmental Statement (ES), prepared in accordance with the EIA Regulations.

The accompanying ES has been produced in accordance with the EIA Regulations and best practice guidance produced by the Government and other organisations including the Institute of Environmental Management and Assessment (IEMA). It has been prepared by the agents for this application along with their Consultant Team using information gathered during a formal EIA of the Proposed Development in September 2018 (Reference MC/18/2612), which was for up to 550 dwellings, a potential primary school extension and associated works.

The proposed development to which this application relates is for a scheme of a similar nature, scale and function. As such, the ES submitted in support of the current application covers the environmental topic areas agreed as part of the EIA scoping exercise for the previous application.

The ES submitted in support of the application confirms that no unacceptable environmental effects would arise from the construction and operation of the proposed development either alone or in combination with other developments.

The relevant ES chapters are addressed under separate headings within this report.

Background

Previous application

An outline application with some matters reserved (appearance, landscaping, layout and scale) for the construction of up to 475 dwellings including affordable housing, commercial floorspace (Use Classes A1/A3/A5, up to 200sqm), sports pavilion (Use Class D2, up to 200sqm), associated public open space, multi-functional green infrastructure, outdoor sports facilities, access, parking, infrastructure, landscaping, attenuation and earthworks was submitted in 2014. The application was refused in 2015 for the following reasons:

1. The application is an unsustainable form of development which would be poorly related to the settlement of Hoo and overly reliant on the private car, and would fail to meet social, environmental and economic objectives. The presumption in favour of sustainable development as set out in the NPPF, therefore, does not apply and benefits arising from the delivery of housing would not be sufficient to outweigh this. The proposal would be contrary to the policies and principles set out at paragraphs 7, 8, 14, 17, 34 and 70 of the NPPF.
2. The application would cause significant harm to the local landscape, and cause coalescence between the settlements of Hoo St Werburgh and Chattenden. It would, therefore, be contrary to the provisions of Policies BNE34 and BNE1 of the Medway Local Plan 2003, the Medway Landscape

Character Assessment 2011, and to the policies and principles set out at paragraphs 17 and 109 of the NPPF.

The decision was appealed to the Inspectorate and the appeal dismissed on the 6 September 2016.

Chronology of Scheme

The original application was submitted and was validated in October 2024.

In December 2024 a biodiversity net gain (BNG) metric was submitted.

In February 2025 an initial consultee discussion meeting was held to discuss consultation comments received in relation to Landscape, Transport and Ecology. In February 2025 the first planning performance agreement (PPA) meeting was held with the applicant/agent and Local Planning Authority (LPA) officers. This meeting focused on reviewing consultee feedback, technical responses, and programme alignment under the PPA.

In July 2025 ecology reports/updates were submitted.

In September 2025 the second PPA meeting was held with the applicant/agent and Local Planning Authority (LPA) officers. This meeting focused on reviewing the updated technical submissions and consultee responses in relation to highways and transport, landscape and the Chattenden– Hoo Gap, parameter plans, and procedural next steps under the Environmental Statement (ES) Addendum.

In October 2025 a further meeting was held with the applicant/agent and LPA to discuss the additional landscape information.

In October 2025 a meeting was held between Stantec Transport (on behalf of Taylor Wimpey) and Project Centre (representing LPA Highways) to discuss the updated transport evidence base for the application and to agree the technical approach moving forward.

In October 2025 a meeting was held with the applicant/agent and LPA. The LPA advised on their current position in relation to the acceptability of the scheme in relation to the strategic green corridor, developable area and heights as shown on the parameter plan. The LPA advised that they considered that up to 450 dwellings could still be achieved on the site if the developable areas of the site were reconsidered, which would provide a meaningful strategic green corridor.

In November 2025 the LPA carried out a Design Review Panel on the development.

In December 2025 amendments were submitted in relation to a wide range of topics but also included an amended parameters plan.

In January 2026 amendments to ES chapters and addendums were submitted (flood risk assessment, addendum preamble, ES addendum volume 1 and 2, water

resources and flood risk, site and development description, introduction, non-technical summary addendum).

Design Review Panel

After the LPA set out its position to the agent and applicant regarding their current position on the acceptability of the scheme in relation to the green corridor, developable area and heights as shown on the parameter plan, the LPA considered it necessary to have a design review of the scheme. The LPA invited the applicant/agent to be part of this review, but they declined the opportunity to attend and present to the DRP.

This application was reviewed in the report of the Medway Design Review Panel (DRP), dated 3rd December 2025. DRP considered the application submissions as at that date.

The DRP report concluded that whilst the principle of development was supported, the parameter plans are not acceptable. The DRP are concerned that the proposals do not relate or reflect, inter alia, the local landscape character, there is a lack of connectivity to the neighbouring settlements, there is limited high-quality landscape space and that the height and massing of the built form is appropriate.

The DRP's key recommendations for the 'local authority' include that it should:

“Clearly define the purpose and intention for the “green gap” between the settlements of Hoo and Chattenden. This could be a positive landscape space that provides separation and reinforces local character, while also being a landscape resource of benefit to nature and the local community.”

For the applicant the DRP recommends that they should:

“Clarify the purpose of the Green Gap and reconsider whether it is in the best location to achieve that purpose.”

The detailed comments of the DRP have a clear focus on the “Green Gap”, as they refer to it, and that the understanding of this is the starting point for the design. The DRP goes on to state that “Preventing coalescence of the settlements of Chattenden and Hoo must be considered in physical, visual and perceptual terms, which as such addressing it both in the context of the proposed development and other developments and allocated sites coming forward in the area” and that “this space should be considered in terms of its potential to be a positive feature in the landscape, offering benefits for nature and for the community, marking a transition between places.”

The DRP is critical of the application, stating that the area between the south-west edge of the development and Chattenden is unsuccessful and “The physical gap is minimal and unlikely to achieve a meaningful separation between the places, while accommodating a poorly located cricket pitch and isolated parcel of residential development”.

This review has also had regard to the 2016 appeal (APP/A2280/W/15/3132141) for a similar application site and for a scheme that challenged similar issues of coalescence and effects on character and appearance. This appeal was dismissed. The Inspector concluded that the existing fields between Chattenden and Hoo that form the narrowest part of the existing gap “provide a clear degree of separation between the two settlements” and that a combination of sports field development within the gap and housing to the north-west of Hoo would “give an impression of continuous urbanisation from the summit of Chattenden as far as Sundown and Coronation Bungalow on the Deangate Ridge. So, it follows that if the appeal proposal were to proceed, the sense of separation between Hoo and Chattenden would be lost”.

Paragraph 64 and 65 of the appeal decision states “in contrast to Hoo, Chattenden originated on top of the saddle of land which connects the Deangate and Cockham Farm ridges. It has since spread down towards the valley bottom but, when seen from Cockham Farm ridge or from the A228 (Mr Chard’s appeal site context photographs 10 and 15), fields F2 and F1 still provide a clear degree of separation between the two settlements. Notwithstanding the suggestion that most of field F1 be laid out as a sports ground, that would still give an impression of urbanisation, as do the floodlit playing fields of the Hundred of Hoo school. The existing landscaped bund on the south side of Main Road and the additional landscaping on the north side suggested in this appeal would provide severance rather than true separation.

The landscaping of field F3 would provide a pleasant setting for the A228 but driving along it would still give an impression of continuous urbanisation from the summit of the hill at Chattenden as far as Sundown and Coronation Bungalow on the Deangate Ridge. So, it follows that if the appeal proposal were to proceed, the sense of separation between Hoo and Chattenden would be lost.”

The DRP forms a broadly similar conclusion to the Inspector at paragraphs 64 and 65 of the appeal decision, in that the existing gap between the settlements provides clear separation and that built development within it and that also some form of recreational uses within it could erode the meaningful sense of separation that exists. This review seeks to identify appropriate boundaries of the Strategic Green Corridor, in this context, and to establish some landscape principles for the treatment of these boundaries and for the open uses that may be appropriate within it. These are ‘in-principle’ findings that address the spatial requirements for a successful gap and set the scene for the more detailed analysis identified by the DRP as to the nature of the gap as a landscape resource and in linking the communities.

Since the DRP report date, the applicant considered the Council’s general feedback and consultee comments and made amendments to the Overall Parameter Plan (for which approval is sought, drawing number 333100395 LN-LP-11 Rev D) and supporting illustrative material including the Illustrative Landscape Masterplan. Amendments and updates were also made to supporting assessments. The amended Overall Parameter Plan, alongside updated and new assessments, were submitted to the Council on 11 December 2025. This included an Environmental Statement Addendum addressing the EIA regulation 25 requests and relevant consultee comments. These amendments were not made directly as a result of the DRP report as the Applicant had declined to take part in this process.

Principle

Section 38(6) of the Planning and Compulsory Purchase Act 2004, together with section 70(2) of the Town and Country Planning Act 1990, 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 Hoo St Werburgh as defined in the proposal maps to the adopted Local Plan (and see also the Hoo St Werburgh and Chattenden Neighbourhood Plan). It, 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 which seeks 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 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; namely that it is on a site allocated for that use; the development essentially demands a rural location, or it would involve the re-use or adaptation of an existing built-up area.

As the proposal does not fall within one of the identified exceptions in Policy BNE25, it is in conflict with that policy as a matter of principle. However, it is acknowledged that the Local Plan is of some age, being adopted in 2003, and the Council does not currently have a five-year housing land supply (paragraph 78 of the NPPF).

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 Hoo St Werburgh. 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.

The NPPF is a material consideration. Paragraph 11(d) states that where there are no relevant Development Plan policies or the policies are out of date, to grant planning permission unless the policies in the NPPF provides a strong reason for refusing or where the adverse impacts of doing would outweigh the benefits. In relation to whether the policies in the Development Plan are out of date, Footnote 8 of the NPPF states that for applications involving the provision of housing, this would include where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 72), or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. The Council cannot currently demonstrate a 5 year supply of housing.

Furthermore, the latest Housing delivery test results show the Council has provided 72% of its housing need and thus the presumption in favour of sustainable development applies. There is, therefore, a significant need for new housing in the Medway Area.

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.

The Hoo St Werburgh and Chattenden Neighbourhood Plan (NHP) was adopted in September 2024, and it is, therefore, the most-up-date Development Plan document. The NHP states that “future development needs to have cohesion and connectivity to ensure there is a sense of place throughout the village, with the village centre at the heart of our community.” (para 5.2.4). The NHP does not allocate sites for housing or employment outside of the existing village boundary. However, Policy HOO1 supports employment development subject to sites having adequate and safe access to a highway with sufficient capacity and there being no adverse impacts. Similarly, policies HOO4 and HOO5 of the NHP are supportive of new housing development coming forward on sites provided that they do not significantly affect the amenities of existing residents, the historic environment (in line with Policy H007), the landscape and natural environment (in line with Policy H008) and delivers a range of housing such as affordable housing and older peoples housing in order to meet local needs.

Regulation 22 Medway Local Plan 2041

In determining whether the principle of this proposal is acceptable, it is important to have regard to material considerations, in particular, the emerging Local Plan. The Local Planning Authority is progressing the Medway Local Plan 2041 to replace the Medway Local Plan 2003.

The Regulation 19 version of the emerging Plan was approved for publication at a full Medway Council meeting on Thursday 26 June 2025. A 6-week consultation period ran from Monday 30 June until Monday 11 August 2025. A pre-examination checklist was submitted in November 2025 to the Planning Inspectorate and their response confirmed that, subject to addressing some relatively narrow questions, the emerging Plan was ready for examination. The Regulation 22 Local Plan was submitted for examination on 18th December 2025 and examining inspectors have been appointed. The expectation, as set out within the Local Development Scheme, is that the plan will be adopted in December 2026.

The Regulation 22 Local Plan 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 meets 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 also 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. Outside of the urban regeneration areas, the expansion of identified suburban neighbourhoods and villages will be supported, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided. 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.

Hoo is one of the settlements identified for growth and the site in question is allocated for up to 450 homes and supporting commercial (SiteHHH8) as part of draft Policy SA8 which includes all proposed site allocations at Hoo St Werburgh and Chattenden within the (Regulation 22) Medway Local Plan 2041 which could accommodate a large extension to the existing village of Hoo St Werburgh. Policy SA8 sets out the objectives and criteria for this and requires that any development would be aligned with improvements in transport, community services and facilities, retail and new job opportunities, be landscape led, responding sensitively to the

natural surroundings and the area's heritage, securing a strategic landscape corridor to maintain the separation of Hoo and Chattenden as distinct settlements. It is envisaged that development will come forward in accordance with a strategic masterplan for Hoo and Chattenden, providing a framework for design, landscape and green infrastructure, heritage, services, employment, transport, infrastructure and defining distinctive neighbourhoods and centres. The policy also requires that future development respond to local housing need, provides for key local services, supports improvement to public transport and contributes to delivering appropriate highways mitigation for extent of growth anticipated. Policy SA8, for this site, sets a yield of up to 450 new homes, with land uses comprising residential and supporting commercial uses. With delivery expected in phases across the plan period, years 1-10.

The proposal is in conflict with the policies of the existing Local Plan and NHP concerning the principle of growth. However, subject to the concerns raised below in respect of the provision of a strategic gap as is required by Policy SA8, the proposal is consistent with the overarching spatial strategy in the emerging Local Plan. It should also be recognised that there is a significant need for housing, which can only be accommodated by developing appropriate sites outside of existing settlement boundaries.

On balance and in circumstances where there is no 5yr Housing Land Supply, it is considered that greater weight should be given to the strategy and allocations in the emerging Local Plan which will meet the area's housing need.

Taking into consideration the proposed development for up to 450 dwellings, commercial and community use along with the associated public open space and landscaping, it is considered that as a matter of principle development of the site would align with the growth envisaged within Hoo St Werburgh and I, therefore, it is considered that the location of the proposed development is acceptable in principle.

Policy SA8 Hoo St Werburgh and Chattenden Policy Allocation

When looking at this particular site (HHH8), it is important to understand why this location has been selected as an allocation within the emerging Local Plan.

The spatial strategy, broad locations and preferred site allocations were informed by iterative Sustainability Appraisal and Land Availability Assessment to identify an appropriate development strategy for the emerging Local Plan.

This site forms part of a wider planned expansion of Hoo St Werburgh, which is a key component of the emerging Local Plan's spatial strategy. This provides for a range of development needs and complements the council's regeneration programme. It supports improved services to the rural communities of the Hoo Peninsula, through strengthening the role of this large village as a rural service centre.

This site is considered as part of the planned extension of Hoo Village which will benefit from planned investment in infrastructure. It is also conveniently located adjacent to the existing village boundary. Hoo is considered to be an existing

significant settlement, of over 12,000 residents, and planned expansion will provide targeted investment in specified areas.

This collaboration supports the strategic objectives of the emerging Local Plan for developing transport networks, and strengthening communities. Transport improvements are specific criteria in the proposed strategic site allocation policy for Hoo and Chattenden. The existing public transport network with Hoo provides regular bus links into Chatham with multiple buses an hour which extend into late evening. This will be further improved through planned development, and a sustainable transport strategy for the Hoo Peninsula, with Hoo providing a hub for enhanced bus services, such as a bus interchange, with links across the wider peninsula and improving and providing priority to public transport links to urban Medway for higher level services and employment.

Scheme Impacts

Having addressed whether the proposal is acceptable in principle, it is necessary to consider whether the impacts of this particular proposal are acceptable. 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, 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. These matters are considered below in the balance as set out at the end of this report.

Site and surroundings

The application site measures approximately 31.12 hectares and comprises mostly agricultural fields with grassland margins, ruderal vegetation, scrub and broadleaved woodland as well as native hedgerow and tree lines. A group of trees which have a tree preservation orders (TPO) on them, are located on the eastern boundary. Hoo Stream flows west to east through a wooded riparian corridor. The site is bounded by Ratcliffe Highway to the north, beyond which is the A228 Peninsula Way. The settlement edge of Hoo St Werburgh lies to the east. The Grade II Listed Mill House is located to the northern boundary of the site and the City Way Health (former Windmill Public House) is located north east of the site off Ratcliffe Highway and is considered a non-designated heritage asset.

The furthest eastern portion of the site would abut Knights Road/Aveling Close, to the south the Hundred of Hoo Academy School site, which contains a primary and

secondary school and up to the boundary with Main Road and to the north eastern/north Ratcliffe Highway and some sporadic residential dwellings, which includes the listed Mill House.

The site is not subject to any statutory national or international designations for landscape or nature conservation.

The application site is situated adjacent to the village of Hoo St Werburgh, approximately 1.5km east of Chattenden and 3.5km north of Gillingham on the Medway estuary.

Much of Hoo consists of post war, mid-20th Century, residential development. The village core itself is much older with St Werburgh Church thought to date back to the 12th century. Development has spread to the northwest, between Main Road and Bell's Lane. In more recent years, significant development has also occurred to the east of Bell's Lane and on Stoke Road.

Existing development is of a medium density. Properties adjacent to the site are mainly two storey in height.

The village core has a number of shops and other services with shops being located round the Main Road, Bell's Lane junction. Facilities in this area also include Pubs, Pharmacy and Restaurants and Take Aways. These extend along Church Road with St Werburgh Church located to the south. More modern housing is also located to the south of the church.

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. 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 two soil types present within

the site, classified as a mix of grades 3a and 3b and the areas (hectares) of each grade are presented in the table below.

Grade	Description	Area	Percentage
3a	Good quality	6.8	22
3b	Moderate quality	21.5	69
NA	Non-agricultural	2.8	9
Total		31.1	100

The proposed development would, therefore, result in the loss of approximately 28.3 hectares of agricultural land, which is largely classified as Subgrade 3b with a proportion of Subgrade 3a. 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.

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. The nearest statutory designation is Tower Hill to Cockham Wood (SSSI), located approximately 480m south to the south of the site.

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 emerging 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 objectives in the emerging Policy SA8 of the (Regulation 22) Medway Local Plan 2041 include that:

1. By 2041 Hoo St Werburgh will have strengthened its role in serving local residents and wider villages across the Hoo Peninsula. Sustainable development will provide around 4,700 new homes, aligned with improvements in transport, community services and facilities, retail, and new job opportunities. Growth in Chattenden will provide for 600 new homes and new and enhanced services.
2. Development will be landscape led, responding sensitively to the natural surroundings and the area's heritage.
3. The separation of Hoo and Chattenden as distinct settlements will be secured through a strategic landscape corridor.
4. Development will provide for distinctive neighbourhoods, with strong connections to the existing and new settlements.

The policy then goes on to set out detailed criteria:

The supporting text in emerging Policy SA8 of the (Regulation 22) Medway Local Plan 2041, paragraph 14.9.8 emphasises that "it is important to ensure the distinct identities of Hoo and Chattenden. Development must retain the separation of the historic villages of Hoo and Chattenden and avoid coalescence. A landscape buffer is a key part of the strategic planning, providing for views over open landscape". Figure 14: Concept Plan identifies a proposed 'Strategic Green Corridor' between the two settlements and the proposed development allocations. This policy defines two of the four objectives of the policy to be that development will be landscape led, "responding sensitively to the natural surroundings" and that the separation of the two settlements will be secured through a strategic landscape corridor.

The strategic gap is addressed in further detail below:

Emerging Policy S4 of the (Regulation 22) Medway Local Plan 2041 attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, the role of the river and estuaries in Medway's identity, and the intrinsic character and beauty of the countryside, in containing urban sprawl and retaining the separation of settlements.

Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan states that development should enhance and avoid causing significant harm to the area's landscape character, flora and fauna, and habitats, and seek to achieve overall biodiversity net gain and should avoid causing loss or harm to biodiversity, or where habitat loss or damage cannot be avoided, it should be minimised and as a last resort, habitat loss or damage should be compensated. Policy H008 states that the open character of the landscape separation between Hoo and Chattenden is of significant local value and this characteristic should be retained. The impact of development in this vicinity must be examined and mitigated with a Landscape and Visual Impact Assessment.

The site is also identified as being part of the Landscape Character Area G3 - Hoo St Werburgh in the Medway Landscape Character Assessment 2024. The MLCA describes the characteristics of this character area as gently undulating landscape that transitions from the marshes in the south east to the Chattenden Ridge to the north, relatively open landscape composed of large scale arable fields bounded by fragmented hedgerows and occasional hedgerow trees, development is limited to that along Broad Street/Main Road and farmsteads on Ratcliffe Highway, the edges of Hoo St Werburgh and Chattenden are visible and open, exposed landscape with far reaching views especially south across the Medway estuary and framing views of Hoo St Werburgh.

The openness of the landscape, the long views and presence of the settlements of Hoo St Werburgh and Chattenden are all key features. Within the section on 'Cultural Influences' within the MLCA, it identifies that the large villages of Hoo St Werburgh in the east and Chattenden to the west are not well-integrated into the landscape, and their settlement edges are highly visible and that the A228 dual carriageway passes through the centre of the landscape, and creates barriers to access. The large roundabouts are out of keeping with the rural character. Ratcliffe Highway and Broad Street are the other roads through the area. The section on Perceptual Influences highlights that this is a large, open landscape with little sense of enclosure; field boundaries are often sparse and poorly managed. This produces a weak landscape structure with a lack of distinctiveness and that modern influences on the landscape include the poorly integrated edges to Chattenden and Hoo St Werburgh and the busy A228. The adjacent settlements, industry and roads are highly visible from the landscape.

The key sensitivities and values for this character are gently undulating arable landscape, contrasting with the adjacent wooded ridges and marshland, rural landscape with limited development, an open buffer helping prevent the coalescence of Hoo St Werburgh and Chattenden and maintaining their distinctive identities; ribbon development along Broad Street/Main Road to the south threatens this, open exposed landscape with far reaching views across the Medway Provides a sense of place and provides a rural backdrop to Hoo St Werburgh.

The section on 'Issues and Changes' cites suburbanisation on the edges of the settlements, poorly integrated settlement edges especially to Hoo St Werburgh, and the "threat of further expansion" into the landscape and "impact of future development". The Development Management strategy includes the following principles:

- Retain the remaining open areas between Chattenden and Hoo St Werburgh to prevent their physical and perceived coalescence;
- Encourage the integration of existing and new development into the landscape through the use of native shelter belts, hedgerows and woodlands to reflect and reinforce rural character, and strengthen settlement edges.

As illustrated on Figure 7.4: Site Appraisal Plan, the site consists of six fields extending to 31.12 hectares (ha). From Main Road Hoo, on the southern boundary of the site, the landform within field F1 falls gently from 30m AOD towards the stream corridor at 23m AOD and is locally enclosed by the Ratcliffe Highway. From the

stream corridor the landform rises across fields F2, F4 and F5 to 65m AOD at the northern corner of field F4. Fields F3 and F6 are located to the west of the Ratcliffe Highway, with the landform rising northwards from 30m AOD in the southern part of field F3 to 50m AOD in the northern part of field F6.

The landscape and visual chapter within the ES identifies a range of landscape features present on the site and gives their condition and contribution to the landscape, as noted in the context of the landscape character areas, their sensitivity to the type of development proposed is noted as follows:

Trees – where present, these are a part of the field boundary pattern and form prominent structural elements within the landscape, as well as a strong positive landscape feature including some along the eastern boundary that are subject to a TPO, representing a high value. They would take considerable time to replace and form part of the vegetated character across rising landform, and, therefore, their susceptibility is high. Their sensitivity to the type of development proposed is high due to the combination of high value and high susceptibility.

Hedgerows – although limited on Site, these contribute positively to the Site and would be replaceable over time. Therefore, their susceptibility and value are medium, and their sensitivity to the type of development proposed is medium.

Waterbodies – the stream corridor is considered to make a positive contribution to the landscape character and would be replaceable over time. Therefore, the susceptibility is medium. The stream corridor is considered to be valued locally, and, therefore, of medium value. The combination of the medium susceptibility and medium value result in a medium sensitivity to the type of development proposed.

Agricultural fields – whilst these reflect the surrounding land use and are a commonplace feature their susceptibility is high due to the time required to replace in relation to the introduction of new built form. Their value is considered to be low, as they do not provide for recreation. Therefore, the balance between the high susceptibility and low value is results in a medium sensitivity to the type of development proposed; and

Road infrastructure – this includes lighting and signage along the roads, which do not provide a positive contribution to the landscape character, are of low value and low susceptibility; therefore, their sensitivity to the type of development proposed is low.

The ES chapter advises that the visual appraisal has been undertaken through a combination of desk-based study with the generation of a ZTV (Zone of Theoretical Visibility) and extensive field work. The ZTV and visual appraisal demonstrate that in relation to near and mid-distance receptors the Site is predominantly contained and enclosed due its location on the southern slope of the Deangate Ridge and its relative proximity to the Cockham Farm Ridge. The exception is the northern part of the Site, which is visible in longer distance views to the south of the Site, due to its elevation above the level of the Cockham Farm Ridge.

From near and mid-distance locations, views of the site are available from the Ratcliffe Highway and Main Road Hoo; existing residential properties adjacent to the Ratcliffe Highway and Main Road Hoo; bordering the Site within Vidgeon Avenue on the western edge of Hoo St. Werburgh; and PRoW to the north and south of the Site, including the Saxon Shore Way. Within these views the extent of the Site that is visible varies due to the localised variations in the landform, the orientation of residential properties and the extent of intervening vegetation and built form. The Site is viewed in the urban context of the surrounding road infrastructure and residential properties along Main Road Hoo, the Ratcliffe Highway and Hoo St. Werburgh. Notable characteristics within these views are the linear form to the western edge of Hoo St. Werburgh, the sky-lining of existing residential properties along the Deangate Ridge and the visual connection between residential properties along Main Road Hoo and within Chattenden. Within the longer distance views, identified as extending to the River Medway, the northern part of the Site is visible, although it forms a very minor component within the wider view, and is seen in the context of existing residential properties within Hoo St. Werburgh.

This ES chapter concludes that “while the development will result in some significant adverse landscape, visual and night-time effects, the majority of these are related to effects assessed before secondary mitigation measures are factored in”.

The overall parameters plan show the heights of built development for most parcels up to a maximum of 12.6m (+/- 2m) above the highest existing ground level for each parcel, and to a maximum of 9.3m (+/- 2m) above the highest existing ground level in the most elevated portion of the Site (toward the centre/north). For the parcel in the western extents of the site which includes the mixed-use local centre, the building heights would be limited to a maximum of 15.7m (+/- 2m) above the highest existing ground level within that parcel.

In considering the latest revised overall parameters plan (drawing number 333100395 LN-LP-11 Rev D), the three westernmost development parcels, two of which are shown split by the route of the access road in combination with the three-storey residential development and the mixed use local centre on these three parcels would have a substantial landscape and visual impact on the landscape character setting of both Hoo St Werburgh and Chattenden, as perceived from views north across the application site from the proposed vehicular access on Main Road towards the Deangate Community Parkland and south from Ratcliffe Highway, next to Coronation Bungalow, towards Chattenden and the Chattenden Ridge, as well as a wider range of other views in the local landscape context.

The separation of Hoo and Chattenden

The value of protecting of the separate identities of Hoo and Chattenden has been recognised through various landscape character assessments and the considerations of other schemes in the same area. It is a central objective of Policy SA8 in the emerging Local Plan, and is all the more important given the spatial strategy seeks an expansion of Hoo and, albeit to a lesser extent, Chattenden

Although the MCLA (2011) was not intended as a policy making document in itself, it was one of its “General Themes and Policies” to resist the threat of coalescence and

openness between rural settlements. This aspect underlies Policy BNE25 of the adopted Local Plan, as acknowledged in the 2016 Appeal Decision (at DL/62). The area in relation to the appeal site acts as a green corridor between the settlements of Chattenden and Hoo, and this was acknowledged by the Local Plan Inspector, and by the Inspector in the 2016 Appeal Decision (see DL/63-66).

The emerging Local Plan imposes a policy requirement to ensure that Hoo and Chattenden retain separate identities.

Objective 3 of Draft Policy SA8 provides that the separation of Hoo and Chattenden as distinct settlements will be secured through a strategic landscape corridor.

Under the detailed criteria set out for development under Draft Policy SA8, it is said that “16. Development will be landscape led. Growth will be directed within a strategic environmental framework that will define the outward development of Hoo and Chattenden. This will provide an effective buffer to sensitive habitats and connect people to the countryside and coast. The strategy will provide opportunities for sustainable drainage measures to enhance the place-making and character of new development, and provide an integrated approach to the delivery of BNG and strategic mitigation.”

Whilst the supporting text to Draft Policy SA8 acknowledges that the level of development planned for Hoo and Chattenden will involve “significant change” (§14.9.7), it is said that growth will be planned at a strategic level across the parish, and delivered through “distinct, but connected neighbourhoods and villages”. It is emphasised that “it is important to ensure the distinct identities of Hoo and Chattenden”, and “development must retain the separation of the historic villages of Hoo and Chattenden, and avoid coalescence”. Accordingly, “a landscape buffer is a key part of the strategic planning, providing for views over open landscape” (§14.9.8).

Figure 14 of the emerging Local Plan, ‘Hoo St Werburgh and Chattenden Concept Plan’, illustrates the importance of a strategic green corridor between the two settlements.

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 suburban 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. Whilst a degree of landscape and visual harm would inevitably follow from any significant proposal for development on the allocated site and is, therefore, not necessarily unacceptable, development of the three westernmost parcels, with three-storey development and the local centre are more harmful and their inclusion unnecessarily exacerbates the landscape and visual harms. The principle of development of the northernmost parcel is more acceptable in landscape terms, enclosed to the south by the existing settlement and contained by the high ground to the north, as well as being set back from the core part of the required gap.

Furthermore, the development would effectively close the gap, between the settlements of Hoo St Werburgh and Chattenden, to such an extent that in most views these settlements would have essentially coalesced and their separate identity lost. The relatively narrow but essential landscape gap between the two settlements would be lost in the long, elevated views from the north and south. The provision of the playing pitches in the south-western corner would be an open use, but it would be too small and in any case is relatively discreet in the landscape, being hidden behind existing vegetation, to make a significant contribution to the perception of a gap.

The proposed developable area along with the heights as shown on the parameters plan would effectively close the gap, between the settlements of Hoo St Werburgh and Chattenden, to such an extent that in most views these settlements would have essentially coalesced and their separate identity lost and, therefore, the development would conflict with the underlying objectives of Policy BNE25 of the adopted Local Plan; Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040; Draft Policies SA8, and S4 of the Regulation 22 Medway Local Plan 2041.

As set out elsewhere in this report, it is considered that with more efficient and effective design the development area can be more contained than the parameters plan provides for whilst still delivering the magnitude of development envisaged in the emerging local plan. This would enable a sufficient and effective landscape buffer to be delivered, capable of functioning as part of a strategic landscape corridor, and so that development on the appeal site secured the separation of Hoo and Chattenden, and successfully maintained the separate identity and character of those settlements.

The Design Review Panel's feedback raised concerns in relation to these matters. In summary, the DRP said: "Whilst we support the principle of the residential-led development and consider the quantum of development achievable for the site, the parameter plans are not acceptable as proposed. We are concerned that the site layout and illustrative masterplan do not relate to or reflect the local/landscape character, there is a lack connectivity to neighbouring settlements and local amenities, there is limited high-quality landscape space, and we are not convinced that the mix of uses, building typologies or height and massing are appropriate."

The DRP advised that the local authority should "clearly define the purpose and intention for the "green gap" between the settlements of Hoo and Chattenden. This could be a positive landscape space that provides separation and reinforces local character, while also being a landscape resource of benefit to nature and the local community."

In particular, the DRP advised that the Applicant should "reconfigure the masterplan to create a more coherent layout with characterful residential clusters linked by meaningful landscape spaces. Clarify the purpose of the Green Gap and reconsider whether it is in the best location to achieve that purpose"; and "fully analyse the culture, character, heritage and identity, and the historic urban grain of Hoo and Chattenden, to inform the fundamental design principles, including the identity of the development and its relationship to surrounding settlements."

Officers consider that with more efficient design, the development area can be more contained than the parameters plan indicates, such that it is possible to achieve the level of development envisaged in the draft policy (i.e., up to 450 homes and a local centre), whilst retaining a significant green gap capable of serving as part of a strategic landscape corridor, as envisioned by Objective 3 of the Draft Policy SA8.

It is considered that the proposal (by virtue of the parameter plans and the location of developable areas) is inconsistent with Draft Policy SA8 of the emerging Local Plan. Accordingly, although the principle of residential-led development on the site is supported, the proposal fails to provide a sufficient and effective landscape buffer capable of functioning as part of a strategic landscape corridor and would also adversely and unnecessarily exacerbate landscape and visual impacts as a result of developing this allocated site. The proposal would result in the perceived coalescence of Hoo and Chattenden, and as a result would not successfully maintain the separate identity and character of those settlements. As such, the Development would conflict with the underlying objectives of Policy BNE25 of the adopted Local Plan; Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040; Draft Policies SA8, and S4 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 SA8 of the (Regulation 22) Medway Local Plan 2041 also requires that development would come forward in accordance with a strategic masterplan providing a framework for design.

Policy H006 of the NHP also states that all new housing design should respect the historic and rural character of the NHP area having appropriate regard to their design guidelines. Policy H002 states that new community facilities will be supported in existing built settlements or in other sustainable and accessible locations. Policy H004 states that support for housing will be subject to there being no significant adverse impact and references Policies H007 (historic environment) and Policy H008 (landscape and natural environment). The policy (H004) also expects housing to meet a range of local needs including housing suitable for older people, people with limited mobility and other specialist housing needs. Affordable homes should also be an integral part of the scheme and be tenure blind. Policy H001 supports employment development that has safe and adequate access and there being no adverse impact on amenity.

Given that this application is outline and the design and appearance of the proposed residential units have not been submitted for consideration, the design of the scheme

cannot be fully assessed at this stage. This would be considered as part of the reserved matters applications if the application were to be considered acceptable.

The development framework illustrates the parameters of the development and identifies the following:

- The application boundary;
- The means of vehicular access into the site;
- The location and extent of proposed land uses;
- The amount of built development (Net Developable Area).

The development (11.19ha) will provide up to 450 new homes at an average net density of 40.2 dwellings per hectare (dph). The development could provide for a broad range of dwellings and house types offering a mix of market housing from first time homes to larger family homes. Approximately, 16.60ha would provide for open space that would include attenuation basins, play areas and informal and formal open space.

An Illustrative Masterplan Framework along with supporting text and illustrations is located within the Design and Access Statement. This shows the development residential development parcels, mixed use area and the play areas, open space, allotments, attenuation and main road through the site.

The Illustrative Landscape Masterplan provides an indication of densities across the site and provides one iteration of how the site could be developed to accommodate up to 450 residential dwellings, commercial and associated infrastructure.

Overall, it is considered that up to 450 residential dwellings could be adequately accommodated on this site, however, as highlighted within the landscape section of this report the developable areas as shown within the parameters plan would not be acceptable. It is considered that with some efficient design the development area can be more contained than the parameters plan indicates and a significant green gap could be delivered, to retain a sufficient and effective landscape buffer capable of functioning as part of a strategic landscape corridor, and so that development on the appeal site secured the separation of Hoo and Chattenden, and successfully maintained the separate identity and character of those settlements.

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 Hoo St Werburgh and Chattenden. A financial contribution of £1,499,135.63 towards enhancement of open space facilities in the vicinity of the development as well as outdoor sport is also sought.

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.

It is considered that a proposal for up to 450 residential dwellings could adequately be accommodated on the site in a manner that is in accordance with Policy BNE1 of the Local Plan, emerging Policies SA8 and T1 of the (Regulation 22) Medway Local Plan 2041, and paragraphs 131 and 135 of the NPPF and Policy H008 of the NHP.

Amenity

Paragraph 135f of the NPPF states that achieving well-designed places should include creating a high standard of amenity for existing and future users. Policy BNE2 of the Local Plan expects all development to secure the amenities of its future occupants and protect those amenities enjoyed by neighbouring properties. The design of the development should have regard to privacy, daylight and sunlight, noise, vibration, light, heat, smell and airborne emissions and activity levels and traffic generation and emerging Policy T1 of the (Regulation 22) Medway Local Plan 2041. Policy H005 of the HCNP states that residential development should be well designed to be flexible to meet residents changing needs.

There are two main amenity considerations, firstly the impact of the proposed dwelling on neighbouring amenity and secondly the living conditions which would be created for the potential occupants of the development itself.

Neighbouring Residential Amenity

The closest neighbouring residents to this site are in Aveling Close and Main Road. The overall parameters plan shows that residential development would back onto the properties that sit on the western side Aveling Close. The build zone on the parameters plan shows that there would be a gap of approx. 11m from the build zone to the rear gardens of Aveling Close and, therefore, it is considered that sufficient back to back distances could be maintained.

The parameters plan shows that the closest property to the development on Main Road would have a distance of approx. 12m to the side/rear boundary of 256 Main Road, however, this would not be a back to back relationship and the proposed development would be in line with the rear boundary fence of this property and, therefore, it is considered the sufficient distances could be maintained to avoid any detrimental impact on this neighbour.

There is potential disturbance from noise and dust as a result of construction activity and consequently if the application were recommended for approval a condition requiring a Construction Environmental Management Plan (CEMP) would be recommended.

Overall, it is considered that, in principle, the relationship to neighbours would be acceptable and whilst it is acknowledged that outlook from some of these existing properties would be forever altered, it will not cause detrimental harm.

Amenity of Future Occupiers

In terms of the amenity of future occupants it is expected that proposals submitted as part of reserved matters applications would show dwellings that meet the Nationally Described Space Standard for internal floorspace and the garden depths and/or additional internal space for flats to meet the Medway Housing Design Standards (MHDS) where applicable.

The proposal is considered acceptable with regard to the residential development element of the proposal both in considering the impact on existing and future occupiers. The proposal is in accordance with Policy BNE2 of the Local Plan, emerging 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 and vibration impacts.

The ES identifies the principal sources of noise affecting the site would be road traffic using the A228 Peninsula Way and Ratcliffe Highway to the north and Main Road Hoo to the south, coupled with any contributions from the neighbouring Hundred of Hoo Academy, in particular the Artificial Grass Pitch (AGP) located adjacent to the south eastern boundary, and auto-renovations workshop located to the northeast.

For the residential uses, based on the modelled sound levels from the environmental sound survey data, the Site boundaries adjacent to Ratcliffe Highway / Peninsula Way and Main Road Hoo fall within the ProPG risk category of 'Medium' during both the day and night-time, for which the guidance requires that the Development should follow a good acoustic design process which confirms how the adverse impacts of noise will be mitigated and minimised. Future 2032 Annual Average Weekday Traffic (AAWT). Based on the modelled sound levels from the 2032 future traffic flow scenario data, the noise exposure increases slightly, with the Site boundary adjacent to Ratcliffe Highway / Peninsula Way changing to a 'High' risk category during the daytime, for which the guidance requires that a good acoustic design process is followed, which is demonstrated in a detailed Acoustic Design Statement (ADS).

BS 8233 – internal acoustic criteria, the most exposed dwellings overlooking Peninsula Way/Ratcliffe Highway (Plots 77 – 85), Main Road Hoo (Plots 10 – 18), the Hundred of Hoo Academy's AGP (Plot 34), and the proposed sports pitches (Plots 72 – 73). For these most exposed dwellings, the results show that a sound reduction of up to 286 dB will be required to achieve all internal LAeq,T and LAFmax criteria. The reductions for the most exposed dwellings could be accommodated through the use of standard thermal double glazing and acoustic trickle vents.

Noise from the commercial and community element of the development and the sports pitches could also impact on the nearest proposed residential dwellings.

The performance of mitigation measures to protect the new dwellings against these sources has been provided, and includes acoustic barriers/fencing, glazing and ventilation and if the application were to be considered acceptable conditions would be recommended.

Construction noise has also been considered within the information submitted with the application. If the application were to be considered acceptable conditions would be recommended to control this.

Subject to conditions, 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 nitrogen dioxide, dust and particulate matter during construction from the proposed development and road traffic emissions associated with the operational phase.

The effect of the construction phase of the proposed development has been assessed with mitigation in place, in accordance with the guidance. There would be the potential for some temporary effects due to dust emissions during the initial construction phases, most particularly for the few dwellings located adjacent to Main Road, the eastern boundary, and the two isolated dwellings to the north of the Site, but such effects would be mitigated through recommended conditions and be limited to minor adverse effects.

Annual mean NO₂ concentrations are predicted to remain below the annual mean objective at all assessed receptor locations, and the development's impact on local concentrations is defined as 'Negligible' for all assessed receptors, with none of the changes exceed 13% of the AQAL.

Annual mean PM₁₀ concentrations are also expected to remain below the annual mean objective at all assessed receptor locations, and the development's impact on local concentrations is defined as 'Negligible' for all assessed receptors, with none of the changes exceed 1% of the AQAL.

Similarly, annual mean PM_{2.5} concentrations are also expected to remain below the interim target level at all assessed receptor locations, and the development's impact on local concentrations is defined as 'Negligible' for all assessed receptors, with none of the changes exceed 1% of the AQAL.

For the Designated Sites, only Chattenden Woods SSSI experiences an impact from the Site. Nevertheless, the road traffic N Deposition contributions from the Site of 0.01 kg N ha⁻¹ yr⁻¹ are low and would not have a significant effect on any local habitat.

In accordance with Medway Air Quality Planning Guidance, a damage cost appraisal has been undertaken to provide a basis for quantifying the financial commitment required for offsetting potential development-generated emissions. Taking into account potential mitigation strategies, the residual effect is unchanged. 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, emerging Policy DM3 of the (Regulation 22) Medway Local Plan 2041, Policy HOO10 of the Hoo St Werburgh and Chattenden Neighbourhood 2023-2040 and paragraphs 187 and 199 of the NPPF.

Contamination

The applicant has submitted a chapter within the Environmental Statement (ES) addressing land contamination and assesses the potential effects from the disturbance of ground and contamination on human health and the environment during the proposed construction works. The ES chapter also assesses the effects of potentially contaminated ground or groundwater and ground instability on the Development.

The applicant undertook a desk-based ground conditions assessment to identify potential land contamination, sources, instability hazards and sensitive receptors within the study area and a preliminary conceptual model was developed identifying where sources and receptors may interact through pathways (also known as a contaminant linkage).

The desk-based study identified that potential sources of contamination are limited to agrichemicals (residual and point of use, not storage) within the agricultural land that across the whole of the Site, with a limited number of localised potential sources (an historical light railway and filter beds, an area of burnt ground and vegetation, and a fuel pipeline) also present. As described in the desk-based study, limited ground investigation has been undertaken at the Site, with 18No. environmental soil samples subjected to laboratory testing and exceedances of the adopted threshold criteria for beryllium and lead recorded within the natural ground at shallow depth in one area of the Site. It is noted that the available data is considered not to address all the sources of potential contamination and/or contaminants identified in the desk-based study.

If the application were to be considered acceptable full land contamination conditions would be recommended.

A preliminary Unexploded Ordnance (UXO) identification indicated that the site is located in an area where the regional World War Two (WWII) bombing density was Moderate, which is defined as “Areas indicated as having a bombing density of 15 to 49 bombs per 1000acre”.

A Detailed UXO Risk Assessment was commissioned which concluded “there is a Low-Medium Risk that items of unexploded German aerial-delivered ordnance could have fallen unrecorded within the site boundary” and “there is a Low Risk that items of unexploded Allied ordnance could be present unrecorded within the site boundary”. The recommendations made in the UXO report inform the mitigation measures to be adopted.

Subject to the aforementioned contamination conditions and a condition requiring a UXO Risk Management Plan that outlines the mitigation measures to be adopted the development would comply with Policy BNE23 of the Local Plan, emerging 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) has been prepared in support of the application. The FRA investigates flood risk on the site and the surrounding area. The FRA considers the flood risk to the proposed development from various sources, such as fluvial, surface water, groundwater, reservoirs and historical flooding.

The development area falls entirely within Flood Zone 1, meaning it is at the lowest risk of fluvial or tidal flooding. Although a small strip of land providing a foot and cycle link lies within Flood Zones 2 and 3, no built development is proposed in this area, and the overall layout as shown on the parameter plan avoids all fluvial flood risk. The Hoo Stream has been modelled using conservative climate change allowances, and no built structures other than a clear-span bridge will interact with the floodplain. The bridge has been designed with abutments set back from the watercourse and with adequate freeboard above the 1 in 100-year plus 62% climate change event, ensuring no detrimental impact on floodplain storage or flow routes.

The Environment Agency’s surface water flood mapping shows that the majority of the site is at very low risk of surface water flooding, with isolated medium and high-risk areas located around the Hoo Stream and along two natural overland flow paths. The proposed masterplan appropriately avoids placing any buildings within these higher-risk areas. Groundwater flood susceptibility mapping presents a variable risk picture; however, the evidence collectively suggests that the site is generally at low risk, with higher susceptibility confined to the immediate Hoo Stream corridor. There are no records of historical flooding within the site boundary.

The drainage strategy is based on attenuation and controlled discharge to the Hoo Stream, as infiltration is not viable due to the underlying London Clay. The site has been divided into five drainage sub-catchments, each served by an attenuation basin designed to manage runoff from the 1 in 100-year storm event including a 45% climate change allowance. Discharge from the site would be restricted to the greenfield QMED rate of 2.66 l/s/ha, thereby ensuring no increase in downstream

flood risk. The strategy also addresses the existing ditch to the north-east, which currently discharges poorly due to a blocked pipe. This ditch will be regraded and diverted into the proposed drainage network, preventing the current issue of overland flows towards the neighbouring school and ensuring that runoff is safely conveyed into the Hoo Stream.

The surface water drainage strategy has been designed in line with national SuDS standards, incorporating basins, wetland areas, and vegetated conveyance to provide robust water quality treatment consistent with the Simple Index Approach. All basins have been integrated with the landscape strategy to deliver biodiversity and amenity benefits while maintaining functional performance. The proposed foul drainage strategy conveys wastewater to the existing Southern Water network via gravity systems and, where necessary, a proposed pumping station, with final connections situated to the south and northeast of the site.

In light of recent changes to national policy and updated technical guidance, further information would be required at detailed design stage for all developments proposing to discharge surface water to the Hoo Stream or its tributaries.

Recent updates to the National Planning Policy Framework (NPPF) and the 2025 National SuDS Standards require that drainage strategies are supported by robust evidence of runoff volume control, updated hydrological data, and clear demonstration that flood risk is not increased on- or off-site. These requirements are particularly important within the Hoo Catchment, which displays a flashy hydrological nature, due to limited channel capacity, rapid onset of flood conditions during storm events. A precautionary and resilience-led approach is, therefore, necessary.

Given the flashy nature of the Hoo Catchment, designs must prioritise reduction of runoff volume, enhancement of local storage and interception, and improvement of overall system resilience. These measures are required to ensure that new development does not increase flood risk elsewhere and aligns with current national SuDS policy expectations. If the application were to be considered acceptable a condition would be recommended to secure further details are submitted prior to the detailed design stage.

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, if the application were considered acceptable, requiring the submission of further details prior to the detailed design stage and with regards 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, emerging Policy DM1 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 181 and 182 of the NPPF.

Heritage

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides: In considering whether to grant planning permission or permission in

principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Policy BNE20 of the Local Plan relates to development affecting the setting of Listed Buildings. Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. Paragraph 208 of the NPPF states that local authorities, when considering proposals that affect a heritage asset, should seek to avoid, or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. Paragraph 203 is concerned with plan-making strategies, and says the strategy should take into account, among other things, the desirability of new development making a positive contribution to local character and distinctiveness. H007 of the NPH states Development should take opportunities to enhance and avoid significant harm to the character and significance of Hoo's military and war heritage, as well as take opportunities to enhance and avoid significant harm to non-designated heritage including the Windmill former pub (Ratcliffe Highway).

An assessment of built heritage and historic landscape has been undertaken as part of the ES. The assessment considers designated heritage assets within a 1km radius of the site and evaluates the extent to which the proposal affects their significance and settings.

The ES chapter considers the following:

The site contains no heritage assets (either designated or non-designated).

The Grade II listed Mill House is located immediately north of the Site. This is a designated heritage asset, of medium sensitivity. Due to its proximity, the Grade II listed Mill House is potentially sensitive to adverse effects as a result of the development.

The Grade I listed Church of St Werburgh is located c. 950m south-east of the Site. This is a designated heritage asset of high sensitivity. From within the Site there are distant views to the spire of the Grade I listed Church of St Werburgh, located beyond intervening built form. Views towards the Site from the vicinity of the church are screened by intervening built form. Views from the Site towards the Church are distant and are not key views. A reduction of these views as a result of the development would not result in a negative change, as such the Grade I listed Church of St Werburgh is not considered potentially sensitive to adverse effects as a result of the development and it is not considered in any further detail.

Other designated heritage assets within Hoo St Werburgh include Grade II listed buildings of medium sensitivity, located c. 670-980m south-east of the site. These include Meadow House, Ivy House, The Chequer's Public House, and Hoo St Werburgh War Memorial. The site visit did not identify any intervisibility with these designated heritage assets, which are located beyond intervening, modern residential built form. These Grade II listed buildings are not considered to be sensitive to adverse effects as a result of the development and have not been considered further.

Other designated heritage assets in the wider area have also been considered within this ES chapter, however, it is considered that the development would not result in any adverse effects to these designated heritage assets.

This ES chapter has considered potential significant effects upon Cultural Heritage, including built heritage and historic landscape and including both potential physical effects and effects resulting from alteration to setting.

The agricultural landscape of the site, comprising large fields typical of post-war agriculture, is not of any notable heritage interest and is considered to be of negligible sensitivity

The development would alter agricultural land comprising large fields typical of post-war agriculture, of negligible significance, to residential development and open space. Mitigation embedded in the design includes the retention of historic field boundaries. The moderate adverse magnitude of impact would result in a negligible significance of effect which is not considered significant. Cumulative effects as a result of the proposed residential development at Land at Ratcliffe Highway would also be negligible.

The Grade II listed Mill House is located immediately north of the site and is considered to be a designated heritage asset of less than the highest significance, as defined by the NPPF. While the Site is adjacent to Mill House, there is no identified historic functional relationship. The elevated topographic location of Mill House can be seen as a reflection of the functional requirements of the adjacent Mill, rather than as part of the design principles of the House. Adjacent agricultural land with the site forms part of the historic agricultural setting of Mill House but is not key to its significance. The parameter and illustrative design plans have taken into account the proximity of Mill House and includes for open space in the adjacent part of the application site. New built form would be offset, downslope to the south. In the absence of a key historic functional association between Mill House and the adjacent agricultural land, with this design measure in place it is anticipated that harm would be less than substantial, at the lowermost end of this harm spectrum. Cumulative effects as a result of the proposed development at Land at Ratcliffe Highway would also be less than substantial.

Under paragraph 215 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Although not considered within the ES chapter, the Windmill former public house is a non designated heritage asset and is located c. 100m north east of the application site. The proposed development within the site would result in the construction of modern built form to the south west of The Windmill, and the character of the land will be altered from agricultural to residential, however, due to the distance from proposed built form to The Windmill, it is considered that this alteration would result in minor harm to the significance of the non-designated heritage asset, with regards to setting.

Under paragraph 216 of the NPPF, the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The low level of less than substantial harm to designated heritage assets should be given considerable importance and weight in the decision making process.

However, the balancing exercise in paragraph 215 of the NPPF, and the assessment in paragraph 216 of the NPPF, have been carried out. It is considered that the public benefits of the scheme include the significant provision of housing (including affordable), accessible open space and play provision, allotments, enhanced footpath links to main road, ecological benefits and the provision of retail and community use to serve the future occupants and existing occupants of Hoo St. Werburgh and Chattenden. It is considered that these public benefits are considered to outweigh the heritage harm identified.

The development is considered to comply with Policies BNE1 and BNE18 of the Local Plan 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 supported by a Heritage Desk-Based Assessment.

The desk-based assessment provides a reasonable account of the archaeological potential of the proposed development. The exception is for the Palaeolithic period which is not adequately considered in the desk-based assessment. It is also considered that the potential for archaeology to be present, may be slightly greater than the ES suggests. On balance, it is considered that the submitted information provides a fair assessment of the likely impacts arising from the scheme. There are deficiencies in respect of the assessment of Palaeolithic archaeology, but it is suggested that these could be addressed by means of a condition should the application be considered acceptable. As such the submitted information meets the requirements of paragraph 207 on the NPPF.

The ES indicates that impacts on archaeological remains could be addressed by "an appropriate programme of archaeological works, secured by way of a condition attached to any planning permission granted. Archaeological works are expected to include geophysical survey followed by trial trench evaluation. Further works, such as archaeological excavation, would be informed by the results of the trial trench evaluation" (ES para 9.72). This approach would be considered acceptable, but in addition to the work outlined, the programme of archaeological work requirement must include assessment and field evaluation of Quaternary deposits and Palaeolithic potential.

Subject to conditions the proposal is considered to accord with Policy BNE21 of the Local Plan, emerging 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 Tower Hill to Cockham Wood (SSSI), located approximately 480m south to the south of the site.

The site is in close proximity to Medway Estuary and Marshes SPA, Ramsar and associated wetlands and is considered as local to county level importance for wintering birds. No bird species associated with the protected area designation are present on site.

The application is accompanied with an ES, this includes a chapter and appendices on Ecology. It is considered that sufficient ecological surveys have been provided with the latest walkover survey conducted May 2024 and bird surveys March 2025. Further updated species surveys would be required if the application were to be considered acceptable.

Breeding Birds

A range of bird surveys were completed in 2014, 2018, 2022 and 2025 recording a total of 61 species overall with 50 considered breeding. This included 13 Red-listed and 18 Amber-listed bird species, of which 12 are S41 species under Natural Environment and Rural Communities (NERC) Act 2006 and five are Schedule 1 species under the Wildlife and Countryside Act 1981.

No species associated with the Medway Estuary and Marshes SPA were recorded for this site in the breeding bird surveys.

Domestic pets such as cats, associated with new residents of the proposed dwellings would be detrimental and impacts to the wildlife population will be expected, especially for nightingales as they are ground nesting birds.

Up to 4 nightingale territories were recorded, and this site is in close proximity of Chattenden Woods and Lodge Hill SSSI which has a nationally important breeding site for nightingale. The proposed development site is considered of local to county importance for nightingale.

It was previously noted that the nightingale habitat had a road break and a footpath break, in an area of vegetation where three nightingale records were made, the section with most nightingale records. We note that Fig 3.2A, Illustrative Masterplan Rev E has rerouted the footpath, and the footpath no longer dissects the above habitat and interpretive signage is proposed. Scrub and tree planting is proposed in this location which will bolster the existing habitat in the area used most by nightingales, and provide added measures to reduce predation, from domestic pets. Management of the overall site will need to focus on the retained, enhanced and proposed habitats to ensure the measures are in place to protect ground nesting birds from predation. If the application were to be considered acceptable a condition

would be recommended for a habitat management and monitoring plan and biodiversity enhancement plan.

Notable numbers of chaffinch were recorded linked to an arable set aside of sunflower and millet, providing food resources. The site is considered of county importance and it is recommended that the management of the site includes continuing use of a seed mix which will continue to support foraging chaffinch. The information provided has shown this would be provided within the Skylark Mitigation area ensuring a regime is in place to continue to benefit birds.

The ecological surveys have recorded up to 10 skylark territories present. The breeding bird mitigation provided further information, with calculations and plans, to assess the skylark mitigation. A precautionary approach of 10 territories lost was used and this would equate to 2.5ha and three fields are proposed for skylark plot mitigation, measuring 3.64ha of proposed habitat for the skylark plots and this is considered to be sufficient compensation of skylark habitat to mitigate for the territories lost.

The skylark plots are spaced within the provided mitigation areas away from field margins. The proposed fields have some tree boundaries but these are either already established or the open space provides sufficient landing access to provide suitability, with existing use noted. Restricting public access has been proposed with fencing required for field F4 and additional scrub planting and this is considered acceptable, but the management plan must require fence checking to ensure residents are not accessing the mitigation areas and management measures for these areas have been outlined. The embankment and tree line by the Ratcliffe highway adjacent to the skylark mitigation areas provide a barrier to skylarks being impacted. The information provided for the skylark mitigation is considered acceptable.

Wintering Birds

Wintering bird surveys have been completed 2018/2019, 2021/2022 and 2024/2025 providing details of 57 species, including five Schedule 1 bird species, 11 S41 species, 12 Red-listed and 18 Amber-listed Species. No species associated with the Medway Estuary and Marshes SPA were recorded within the site.

The ecologist has noted the increase from 55 to 57 species in the latest report and has questioned the relevance of the inclusion for 2 species. At 55 species the site can be noted of county level importance, however, the ecologist states that the number of species is 'either low in number or frequency, with only a few notable exceptions (snipe, woodcock, skylark, wood pigeon, rook, black headed gull)' and it is agreed that none of these are qualifying species of the citation for the Medway Estuary and Marshes SPA/RAMSAR site.

The retention of hedgerow and scrub, with the enhancements above and the SuDS basins, new habitats for birds will be created and further unrecorded wintering species may be attracted to the new habitats and open spaces.

Badgers

A disused badger sett and sign of foraging and commuting was reported on the site October 2021, with a habitat walkover May 2024. The 2021 survey information is still sufficient to inform the outline mitigation strategy and the subsequent 2024 walkover survey would have flagged further badger activity. The surveys are considered sufficient and no further surveys are required at this stage.

If the development would result in damage, destruction or disturbance of any badger setts then a licence to carry out the works may be required from Natural England.

As suitable habitat is present and disused burrows were found. There is a risk that a badger sett may be present on the site or within the surrounding vegetation which could be impacted during construction works. If the application were to be considered acceptable then no more than one month prior to site clearance, a precautionary walkover of the site and a 30m radius around the site should be undertaken, by a suitably qualified ecologist, to search for badger setts. If a badger sett is discovered on site, or within 30m of site, a suitably experienced ecologist will need to provide advice on any necessary mitigations for badgers. This should include whether a badger mitigation licence from Natural England is required prior to the commencement of any works on site. This would be secured by condition.

If the application were to be considered acceptable the Ecological Mitigation and Enhancement Strategy (EMES) will need to be reviewed and, where necessary, updated following pre commencement surveys and be included in a Construction Environment Management Plan (CEMP). This would be secured by condition.

Bats

Up to 9 species of bats were recorded using the site from the bat surveys in 2021, focused on the hedgerow and wooded corridors to the boundaries, with a site walkover habitat survey also conducted in May 2024. Low activity of foraging and commuting behaviour was noted. It is considered that sufficient survey effort has been completed.

Minimal loss of trees and a section of 30m of hedgerow removal is proposed and the EMES states that no trees with potential roost potential are intended to be affected. If this changes, there will need to be potential roost assessment done for any trees to be removed and this could be secured by condition, if the application were to be considered acceptable. The survey data will need to be reviewed by an ecologist to consider if it is still current before any construction commences. The mitigation measures for bats are included in the EMES and the consideration of current survey data and updated information for any tree removals must be included in a CEMP.

Bats will be affected by both the lighting during construction and by the post development street, sport area and footpath lighting, as well as external lighting for buildings. A sensitive lighting strategy is proposed, and if the application were to be considered acceptable a condition would be recommended to secure this, the details would require lighting plans to be submitted showing plans with vertical and horizontal light spill, in lux levels and associated nearby vegetation/habitat and mitigation areas shown.

Bat box enhancement measures have been provided for boundary trees and it is recommended that integrated bat features into buildings is also a measure in the final biodiversity enhancement plan. If the application were to be considered acceptable a condition would be recommended to secure this.

Great Crested Newts (GCN)

Ponds providing suitable habitat are located near or adjacent to the site with suitable connecting vegetation in the field margins and hedgerows and low populations of GCN are expected to be foraging and commuting within suitable habitat within the site. Habitat suitability assessments for GCN have been completed for 10 nearby ponds and suitability is ranked as 2 with excellent, 3 with good, 2 with average and 3 below average. The applicant has submitted a countersigned DLL impact assessment and conservation payment certificate (IACPC) for the GCN District level licensing (DLL) approach.

Evidence of the full conservation payment would be recommended by condition, if the application were to be considered acceptable.

Reptiles

Four species of reptile were recorded on the site, slow worm, common lizard, grass snake and adder. Retained habitat and scrub will be present for reptiles and enhancement areas of new grassland and scrub would provide additional habitat resource.

Mitigation is proposed, that includes habitat manipulation March to October and works will be overseen by an ecologist. The principle is considered acceptable, however, the approach would have to be reviewed as part of the CEMP and this could be secured by condition. Post development monitoring has been outlined in the EMES that would provide post development monitoring to inform and provide long term benefits.

Water Voles

The presence of water voles is noted in the ecological surveys for ditch D1 (Hoo Stream) and off site in D5 and likely in connected D6. Ditch D1, listed as W1 on the habitat map, will have a road crossing and it is noted that this would have a clear span bridge, which will have a lower disturbance to water voles than other more habitat intrusive, engineered bridge solutions. A water vole displacement exercise has been proposed as mitigation, that would be undertaken under a class licence by a registered person. Vegetation clearance and pre and post surveys have been listed as part of the methodology with other protective measures during construction. These measures are considered acceptable and are in line with guidelines. It is that all works required in this area are completed together to reduce the frequency of disturbance to water voles.

A buffer is proposed of 'a minimum' 5m from the bank, along either side of the ditch (D1) and this is required for the post development habitat buffer that would be needed, to prevent recreational disturbance to water voles. This is especially important as it is located within the proposed Gateway Park with a community, multi-functional recreational space, including sports area and footpaths located to the south of the ditch. The EMES states the woodland/scrub buffer zone is shown on

the Parameters Plan, however, this is unclear on the plan due to shading overlaps but it is noted the detail within the EMES clearly states a minimum of 5m and any increases in this width is encouraged.

If the application were to be considered acceptable a condition would be recommended that this buffer is clearly shown on any updated plans and detailed within mitigation documents to ensure that it will be implemented for a sufficient depth of buffer.

The proposed mitigation will also need to be included in the construction environment management plan with a detailed mitigation statement for water voles to include measures to prevent pollution to water courses, from run off during and post construction. Reference to the date of that last survey, and when updated or additional surveys are needed with timelines. The sensitive lighting strategy will need to ensure the areas suitable for water voles are not subject to lighting affects and this should include consideration of any lighting from sports pitches. If the application were considered acceptable this could be secured by condition.

Ecological Enhancements and Biodiversity Net Gain (BNG)

A BNG metric has been provided with the application. The metric shows that there is a baseline of habitat units 87.51, Hedgerow units 31.03 and watercourse units of 6.15 and this is considered to be representative.

The information submitted has shown that the mitigation has contributed to no net loss, but the additional units created from the creation and enhancement of habitats has then achieved over a 10% net gain and, therefore, it is considered that the metric has been correctly used, with the appropriate consideration of the skylark mitigation areas in the metric. The 10% net gain is still achievable in habitat, hedgerow and watercourse units.

The following net change is reported:

Habitat Units 10.55%

Hedgerow Units 18.28%

Watercourse units 20.79%

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan.

Using the national and local guidance regarding significance, it is considered that the on-site biodiversity net gain (excluding private gardens) it may well be treated as significant and would require securing for 30-years. This would be fully established through any detailed layout that would be forthcoming at a later date if this application were to be considered acceptable.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted.

Natural England's recommendation is that a separate accounting line is used, to ensure transparency and a clear audit trail in terms of evidencing the uplift in biodiversity unit value, and this has been applied. The mitigation measures and the habitat delivering BNG is accounted for separately in the metric and should also be separate in any reporting.

Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

It is considered that there is the creation of medium distinctiveness other neutral grassland, willow scrub, mixed scrub, urban trees and species rich native hedgerows to constitute significant on-site gains. Government Guidance states: The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage. As above, if this application were to progress to a detailed stage, then it may result in significant onsite gains which would be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. Monitoring fees should always be secured for significant on-site gains as these will be subject to 30 years of monitoring reports which will need to be reviewed by the LPA at their own cost.

Habitat management and monitoring plan (HMMP)

The scheme must set out the actions needed to create and enhance habitat on-site as well as maintain it for 30 years from the "completion of development" (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990).

Neither the statutory definition of the biodiversity gain plan nor the current DEFRA biodiversity gain plan template requires management and maintenance measures to be specified. As a result, the statutory condition does not on its own secure compliance with the approved biodiversity gain plan (including the implementation of any habitat creation and enhancement works or their maintenance for a 30-year period). The delivery of the gain envisaged by the HMMP would need to be secured by condition.

Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the NPPF, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, if the application were to be considered acceptable a condition would be recommended for an enhancement plan to be provided that includes the actions proposed in the EMES and the ownership and responsibilities for future management of the communal areas.

Conclusions on Ecology

If the application were to be considered acceptable, 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. With the agreed mitigation strategies in place, 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 and BNE39 of the Local Plan, emerging Policies S1, S2 and T1 of the of the (Regulation 22) Medway Local Plan 2041 and paragraphs 187 and 193 of the NPPF.

Habitat Regulation Assessment

A Report to Inform a Habitats Regulations Assessment (HRA) (Ref: CSA/3529/15, dated September 2024) 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:

- Disturbance to key species/deterioration of supporting habitats, beyond the European site;
- Atmospheric pollution/air quality;
- Hydrological regime change;
- Pollution of surface/ground water.

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 the proposed development has the potential to result in likely significant effects on four of the eight European sites when considered alone, and four (comprising the Medway Estuary and Marches SPA / Ramsar and the Thames Estuary and Marches SPA / Ramsar sites) of eight may be subject to in-combination effects. As such, further Appropriate Assessment is required, including consideration of proposed measures intended to avoid or reduce harmful effects, in order that it may be ascertained whether the scheme will have any adverse effect on the integrity of the above European sites.

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.

Air quality

The HRA concludes for air quality that no additional adverse effects to the designated sites would be anticipated from the proposed development alone or in-combination (i.e. no additional exceedance in NO_x or N deposition has been modelled with zero additional deposition on roads within 200m of the designations calculated). Therefore, no adverse effects on the Medway and Thames Estuary and Marshes SPA/Ramsar site are anticipated from the proposed development alone or in-combination with other committed development.

Water quality (surface water)

The assessment identifies a potential pathway for polluted surface water from the proposed development to enter the Medway Estuary and Marshes SPA/Ramsar site via fluvial connectivity, with possible contaminants including hydrocarbons, oils, salts, garden chemicals and household detergents, which may cause significant negative effects on the habitats and species associated with these designations, such as eutrophication. To address this, a detailed Drainage Strategy and Construction Environmental Management Plan (CEMP) secured by planning condition would be required.

The proposed drainage strategy would capture surface water and store within detention basins before discharging it at a controlled rate into the Hoo Stream, resulting in reduced peak flows compared with existing greenfield runoff and delivering improvements in fluvial and surface water flood risk. Open SuDS features, such as basins and swales, will provide water-quality benefits by removing pollutants and can be lined if necessary to avoid groundwater contamination. These measures

are expected to ensure no adverse effects on the integrity of downstream European sites from the development alone. Furthermore, the HRA for the emerging Medway Local Plan 2041 concludes that no in-combination adverse effects on designated sites are anticipated. Overall, pollution-prevention measures during construction and the implementation of a robust SuDS strategy will safeguard water quality at the Medway Estuary and Marshes and the Thames Estuary and Marshes SPA/Ramsar sites.

Overall, the Appropriate Assessment has concluded that, with implementation of the proposed measures to avoid or reduce adverse effects, it can be concluded that the proposed development will have no adverse effect on the integrity of the Medway Estuary and Marshes SPA/Ramsar site or Thames Estuary and Marshes SPA/Ramsar site. Natural England have advised that they concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given.

Trees

An Arboricultural Impact Assessment accompanies the application, including a tree survey, and forms part of the ES.

There is no designated Ancient Woodland covering any part of the site, and no trees on or adjacent to the site are listed on the Ancient Tree Inventory.

Tree Preservation Order (TPO) M230/2015 'Medway Council (Land at rear of Knights Road & Aveling Close (west of Hoo St Werburgh)) 2015' was confirmed in August 2015 and protects 13 individual oak trees and two groups of a total of 17 further oak trees growing along the east boundary of the south-eastern field, to the rear of the dwellings of Knights Road and Aveling Close. These trees translate as English Oak trees T12, T13, T14, T15 and G17 within this survey. The only trees within G17 that are specified as being protected within the TPO document are the oak trees.

It is considered that considerate and careful design, in consultation with the arboriculturist, has resulted in a development that could be accommodated on the site with no material harm to these existing trees.

The scheme would require the removal of the following:

- Four sections of groups of trees and 4 groups of low-quality trees. These removals are shown in the Tree Retention and Removal Plan in Section 3;
- Four sections of groups are required to be removed for the new central spine road connecting the existing roundabout on Main Road to the south with the site and adjacent proposed development land to the northeast. The affected groups are G10 (B2), G14 (C2), G21 and G25 (B2).

It is considered that the removal of these sections can be mitigated by detailed landscape design with new tree and shrub planting which can deliver a net gain in tree species diversity and canopy cover at the site. Overall, the development can be brought forward with negligible impact upon the trees.

A new sewer connection, proposed between the Site and main road, running along the western part of the shared access track that runs between the primary and academy school land, will require the removal of groups of mostly young to semi-mature common ash *Fraxinus excelsior*, suffering from ash dieback disease. Overall, these trees are not considered a significant constraint to the sewer installation and can be removed.

Substantial new tree planting will be achieved on the site, which is currently deficient in trees due to its agricultural use. A diversity of planting styles would be available including formal arrangements, semi-formal planting, small copses and linear features, such as hedges that provide connectivity.

In offering a new age cohort of diverse trees, including many more forms of tree, both in terms of species and of provenance, the contribution to the overall quality of tree stock in the area is substantial, resulting in a gain of biodiversity within the tree population and of the biodiversity supported by the trees. Diversity within the tree population provides resilience in the face of current, and future, pressures and ensures continuity of attributable ecosystem services.

The scheme of planting, that could include both native and non-native species that are large at maturity, would represent a contribution to the amenity of the area, that has seen little new tree planting in recent years.

If the application were to be considered acceptable conditions would be recommended for the protection of the trees through the construction stage of the development along with replacement planting subject to a detailed landscape design. Overall, it is considered that no objections are raised with respect to Policies BNE41 and BNE43 of the Local Plan, emerging Policies S1, T1 of the (Regulation 22) Medway Local Plan 2041 and paragraph 136 of the NPPF.

Highways

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 SA8 of the (Regulation 22) Medway Local Plan 2041 requires that the development shall be designed to ensure strong integration and permeability for pedestrians, cyclists and provision for improved public transport to the surrounding residential neighbourhoods and villages by providing high quality and maintained active travel routes.

The policy further requires that development should also support the improvement of bus services to provide effective sustainable transport links for Hoo and surrounding

villages, with consideration of expansion of fast-track bus services linked to the urban area. Land will be safeguarded to the east of Hoo for a future potential use of the freight line for passenger traffic.

In addition, Policy SA8 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 NHP has one highway related policies relevant to this proposal Policy HOO11 – Sustainable Travel and Active Travel. Policy HOO11 relates better to detailed plans and reserved matters applications as it requires the provision of secure cycle storage and EVCPs, as well as adequate parking and the provision of quality pedestrian links. All of these matters will be detailed in a reserved matters application and are not covered within an outline application.

The Illustrative Masterplan responds to these policies through the provision of walking and cycling infrastructure on the Site that connects to the external network. The on-site provision will include a 20.75m wide spine road corridor, which will include a 6.75m carriageway, 3m verges on either side of the carriageway, a 2m footway on the west side of the carriageway and 4m footway/cycleway on the east side of the carriageway. See Transport Assessment, para. 3.1.9.

It is noted and acknowledged that this spine road only works in conjunction with the adjacent Gladman site. Ensuring that this is secured up to the boundary with this adjacent site is considered acceptable at this point, given that the adjacent site is also now making headway with submissions for development. Collaboration with the Gladman Site will, therefore, be required to demonstrate the continuation of the proposed cycleway and footway to the same or similar specification. It is fundamental to understand that both sites will be coming forward as part of the emerging Local Plan and are allocated sites. Access and road up to the boundary with the adjacent site would need to be detailed and secured to be provided through the S106 as part of non-financial obligations.

Paragraph 6.4.8 of the Transport Assessment includes the proposal that the spine road “would not be a ‘through route’ for all traffic, and only buses, pedestrians and cycles would be permitted to cross between the two sites”. The paragraph goes on to say “this could be enforced with either a bus gate or cameras. The reason for making

it bus, pedestrian and cycle only is to prevent rat-running through the Proposed Development and to encourage bus priority". Medway Council are supportive of the use of bus gates (which can be camera controlled, not necessarily physical gates), particularly in this context.

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.

Pedestrian and Cycling Infrastructure

National Cycle Network Route (NCNR) 179 runs directly past the proposed access to the site at the Main Road Hoo, Main Road, Main Road Chattenden roundabout and loops around the Hoo Peninsula. NCNR 179 connects to National Cycle Network Route 1, which is a long-distance cycle route connecting Dover and the Shetland Islands.

Public Right of Way (PRoW) route RS104 is located approximately 200m from the site entrance and can be accessed directly from Main Road. This connects to several other PRoWs along the south coast of the Hoo Peninsula.

Pedestrian footways currently exist alongside the carriageways within the built-up area of Hoo St Werburgh, including along Main Road and Ratcliffe Highway. The application proposes two vehicle accesses into the site, with the main access being from Main Road and the secondary access from Ratcliffe Highway. It is envisioned that the main spine road through the site would link through to the Gladman development to the north east of the site. This link is proposed to be for buses, pedestrians and cyclists only. All three of these access points would have pedestrian access alongside them, with the main access via the Main Road/Main Road Hoo roundabout having both pedestrian and cycle access. There are a number of additional pedestrian access points around the site to ensure the site is permeable for pedestrians.

There would be pedestrian and cycle facilities on either side of the primary access road, which would connect to the existing infrastructure on Main Road and Main Road Hoo. On the east side of the access road there would be a 4m shared footway/cycleway, separated from the carriageway by a 3m verge. On the west side of the carriageway there would initially be a 3m shared footway/cycleway, this would then narrow down to a 2m footway, and cyclists will be prompted to cross the road using the pedestrian/cycle refuge island which would be located approximately 30m into the site.

A proposed footway/cycleway using an existing farm track which runs between the Hundred of Hoo Primary School and the Hundred of Hoo Academy. and would include upgrading the existing farm track to provide a more direct walking route to the schools and the wider village of Hoo from the northeastern end of the Site.

As part of the development proposals, improvements to the footway provision on Main Road are proposed. Improvements are proposed on both sides of the road and include:

- A signalised pedestrian crossing located approximately 30m from the Site access roundabout;
- Re-aligning the carriageway to the south outside Broad Street Cottages to accommodate a footway. This pinches to 1.2m for a short distance;

- A new 2m footway on the south side of Main Road.

Public Transport

The existing bus services that serves the village of Hoo St Werburgh offers a reasonable level of service given the current size of the settlement. There are currently a pair of bus stops located approximately 75m (1 minute walk) from the site access adjacent to the Main Road Hoo/Main Road/Main Road Chattenden roundabout. The Arriva operated service 191 is a regular service between the Peninsula and the Medway Towns, with multiple buses per hour. These bus stops are also served by several school buses, including the 601, 602, 671 and 673 which serve the Hundred of Hoo Academy, and the 692 which serves the Rochester Grammar School. Overall, it is considered that the existing public transport provides a suitable bus service during the week and at weekends to serve the future residents of the proposed site to access education, retail and employment destinations. Additional to this, the Sustainable Transport Strategy developed as part of the emerging Local Plan secures strategic level investment for the wider planned growth of Hoo which in turn will include better opportunity to further improve and invest in bus services.

Paragraph 6.6.2 of the Transport Assessment Addendum (Appendix 10.1A of the ES) refers to Taylor Wimpey in collaboration with Gladman having undertaken initial discussions with Arriva, the main operator in the area, about potential enhancements to the 191 bus service. The applicants proposed that at least one of the three 191 bus services per hour is diverted through the application site and Gladman site, using the new spine road (referred to above). If this was successfully negotiated it would allow the majority of future residents to be within 400m of a bus service and it is proposed for this to be implemented in phases. It is recognised that the Council are not in a position to secure a bus service improvement currently. However, the existing bus service through Hoo (Arriva Bus 191 – Grain to Chatham) is a reasonably good level of service with multiple buses per hour. On balance, it is considered that this current situation would provide a reasonable bus service to serve the future residents of the proposal site.

Importantly, the Sustainable Transport Strategy developed as part of the emerging Local Plan, will secure strategic-level investment for the wider planned growth of Hoo which in turn will include opportunity to improve and invest in bus services. Consistent with this vision, the proposed development will provide an access route through the site that will connect to the adjacent Gladman site to the east and once fully operational, this would create a spine road between both sites. The spine road would have a 6.75m wide carriageway in order to accommodate buses. A 2m wide cycleway and a separate 2m wide footway would be provided on the southern side of the spine road with a 2m wide footway on the northern side. The intention is that the spine road, once fully operational, could facilitate improved bus services which is generally supported by Arriva, the main bus operator in the area (see Appendix G to the Transport Assessment Addendum). It is proposed that at least one of the three 191 bus services per hour is diverted through the Taylor Wimpey and Gladman sites using the new spine road. Such bus service improvements would have potential the further improve the sustainability of the site.

Further details of the progress of these discussions and collaboration with Gladman on introducing a service would be welcomed. A strategy and timeline for introducing service in line with the development of both sites, and a joint commitment to provide any necessary funding to ensure early bus access at occupation would greatly support the sustainable mode share objectives.

The proposals should demonstrate clear compatibility with Medway's Bus Service Improvement Plan (BSIP) by ensuring the site layout, highway design, and phasing strategy actively support higher bus mode share. In addition (potentially through a condition) swept paths for bus movements and evidence of how parking restrictions will keep bus routes clear would help evidence the potential benefits for operators using this route.

Going forward, the applicant would need to provide location and design details for all proposed bus stops, if they are to be included at a later date. The bus stops should provide sufficient facilities to encourage bus use, including real-time information (RTI) screens and other infrastructure to promote use.

Access to facilities

Emerging Policy SA8 Criteria 8 and 11 and Policy DM12 refer to a network of small retail and community centres across Hoo with uses to meet daily needs of residents. Local retail and community provision is seen as reducing the need to travel and increasing the chance of residents walking and cycling for "top up shopping, community uses, services [and generally] provide convenience for local communities (allowing various activities to be undertaken)".

Emerging Policy T26 requires developers to describe how residential properties fall within a 15-minute walk of schools, places to socialise, and places to exercise. The site sits between the villages of Hoo St Werburgh and Chattenden. Hoo St Werburgh is located to the east of the site and Chattenden is located to the south. The amenities in Chattenden are limited to a primary school and a petrol station, but there are a wide range of local amenities in Hoo St Werburgh. This includes two primary schools and a secondary school, a medical practice, a dentist, two pharmacies, a co-op, sports, leisure and recreation grounds, and multiple places to eat and drink. The primary schools and secondary school are within a 5 to 15 minute walking distance, depending on where you are on the site, while the rest of the existing amenities are walkable within approximately 25 minutes and cyclable within approximately 5 minutes.

The proposed development would provide up to 500m² of commercial floorspace and it is envisaged that this would be operated as a convenience store, where future occupiers and existing occupiers, could purchase top up shopping. Up to 500m² of community use floorspace is also proposed, which again would serve future occupiers of the development and existing residents of Chattenden and Hoo St Werburgh. These proposed facilities within the development, would increase the chance of residents walking and cycling to them and provide convenience for local communities, in line with emerging Policies SA8 and DM12. However, these facilities may not be considered necessary for this development, due to the existing facilities as mentioned within the paragraph above and that Figure 14: Hoo St Werburgh and

Chattenden Concept Plan of the emerging Local Plan identifies allocation HHH12, which is opposite the application site for proposed retail/community service and community facilities.

Access into and through the site

The main vehicular access would form the fourth arm of the existing Main Road Hoo/Main Road/Main Road Chattenden roundabout. The spine road through the site would have a 6.75m to 7.3m wide carriageway. This would allow buses to route through this site and the Gladman site to the north east. It is envisioned that the spine road through the site would pass through both land boundaries before connecting to Ratcliffe Highway to the north east. However, it is proposed that this would not be a 'through route' for all traffic and only buses, pedestrians and cycles would be permitted to cross between the two sites. It is proposed that this could be enforced with either a bus gate or cameras. The reason for this link only being for bus, pedestrian and cycle access is to prevent rat-running through the proposed development, if there is congestion on A228 Peninsula Way, and this in turn would encourage bus priority.

A secondary vehicle access is proposed with Ratcliffe Highway. This would be a simple priority T-junction. The bellmouth would have a width of 5.5m and 9.7m radii. A proposed drop kerb pedestrian crossing to both sides of the Ratcliffe Highway would be provided to allow pedestrian movement to the north side of Ratcliffe Highway to the existing pedestrian footpath. As well as a secondary access, this access point would also allow buses to route through the site during the early phases of development before the link to the adjacent site is complete.

Access and highway safety

The development would be served by two new vehicular access points, one creating the fourth arm off the Main Road Roundabout and the other access from Ratcliffe Highway. 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 are provided below.

Main Road

As part of the development proposals, improvements to the footway provision on Main Road are proposed. Improvements are proposed on both sides of the road and include:

- A signalised pedestrian crossing located approximately 30m from the Site access roundabout;
- Re-aligning the carriageway to the south outside Broad Street Cottages to accommodate a footway. This pinches to 1.2m for a short distance;
- A new 2m footway on the south side of Main Road.

Proposed highway mitigation at Four Elms roundabout

- Increasing the entry width on the Four Elms Hill arm from 9.4m to 10m;
- Increasing the flare length on the A289 Wulfere Way arm from 34m to 40m;
- Increasing the entry width of B2108 Hoo Road from 11m to 12m.

Proposed highways mitigation at A228 Peninsula Way/Main Road roundabout

- Adding a third lane as a flare to the nearside lane (flare length of 25m) of the Peninsula Way (NE) arm of the roundabout;
- Lengthening of the flare to 56m on the Main Road Hoo arm of the roundabout;
- Adding spiral markings to the roundabout to help guide vehicles around the roundabout.

Five years worth of Personal Injury Collision (PIC) data obtained from Medway Council for a five-year period (2017–2022). This data covered a large area including Four Elms Hill, Peninsula Way, Ratcliffe Highway, Main Road and Main Road Hoo. Within the study area there were a total of 74 collisions recorded in the time period, of which 62 were slight, 9 were severe, and 3 fatal.

For the severe and fatal accidents, the location and analysis of the collision data can be seen below:

Four Elms Roundabout

Three of the severe collisions were between a car and motorbike and the fourth was between a pedal cycle and a car. All three of the collisions involving a motorcycle were the result of the car cutting off the motorcycle. The collision between the car and pedal cycle was the result of the car hitting the pedal cyclist as they crossed the slip road between Four Elms Hill and Wulfere Way.

Pedestrian Crossing on A228 Four Elms Hill adjacent to Chattenden Lane

The fatal collision happened when a pedestrian crossing the road was hit by a car.

A228 Peninsula Way / Main Road Roundabout

The fatal collision happened when a motorcycle with a passenger failed to negotiate the roundabout, mounted the central island, and collided with furniture on the roundabout.

The serious collision happened when a motorcycle failed to navigate the roundabout, mounted the central island and collided with a signpost.

Peninsula Way / Ropers Lane Roundabout

The series collision happened when a motorcyclists misjudged its speed and the alignment of the road and collided with the roundabout kerb, causing them to come off their vehicle.

In considering the collision data and volume of traffic that use these links each year and it is not considered that the development would lead to a worsening of the current road safety situation. The proposed development would also deliver new pedestrian facilities along Main Road and mitigation to Four Elms and A228 Peninsula Way/Main Road roundabout.

Travel Demand

The transport assessment (TA) sets out the proposed trip generation for the site based on a 'Business as Usual' (BaU) scenario and a 'Vision' scenario.

The BaU scenario is based on current trends in available data and what would be predicted to happen without interventions. The person trip generation for the BaU scenario have been derived from the TRICS database. It is forecast that the proposed development would generate a total of 443 person trips in the AM peak hour and 361 person trips in the PM peak hour.

National Travel Survey data determines trends relating to personal travel in the peak hours. The data indicates that between 2013 and 2023 (the most recent 10-year period for which data is available), trips per person in both the AM and PM peak hours have reduced, by 3% and 11% respectively and in the broader peak period of 0700–1000 and 1600–1900, trips per person have also reduced.

The TA anticipates that this trip reduction is likely to continue as more people work from home and shop online. The person trip generation rate of the proposed development, which is expected to be completed in 2032, is, therefore, likely to be lower than those included within the TRICS database. It is considered, given the reduction of 3% in the AM peak hour and 11% in the PM peak hour that has been seen over the last ten years, that a further reduction in trips of 50% of the reduction seen previously is reasonable based on the recorded trend. This means a total discount of 1% has been applied in the AM peak hour and 6% in the PM peak hour and would lead to an approximation of 437 two-way person movements in the AM peak hour and 341 two-way person movements in the PM peak hour.

The TA acknowledges that a large proportion of education escort trips, shopping and personal business trips and recreation trips are likely to be linked trips with journeys to work in the peak hours. Therefore, to ensure a robust BaU assessment, in accordance with Census 2011 data, 73% driver mode share has been applied to the person trip generation for these journey purposes. The TA considered that education trips are most likely to comprise children who are not able to drive a vehicle. The proposed development is located within walking distance of two primary schools and a secondary school. There are also good school bus services to other secondary schools in Strood, Chatham and Rochester. Education trips will include trips for further and higher education purposes and these students may be able to drive. Therefore, a reasonable driver mode share of 20% has been applied to education trips and demonstrates a total of 57 in-bound trips and 198 out-bound trips in the AM peak hour and 166 in-bound trips and 79 out-bound trips in the PM peak hour. This equates to a total trip rate of 0.567 in the AM peak hour and a total trip rate of 0.542 in the PM peak hour.

Residential Trip Generation – Vision

The development trip generation set out below presents the proposed trip generation for the Site for a “Vision” scenario. This uses the person trip generation set out in Section 6.2 of the Transport Assessment Addendum but rather than basing mode share assumptions on existing trends, these are instead based on the vision for the site which is set out in Chapter 2 of the Transport Assessment Addendum.

The vision for the site aims to encourage walking and cycling between the site and the village of Hoo St Werburgh, particular trips to primary and secondary education. The vision also aims to encourage bus use for trips to the Medway Towns. The 191 bus service already passes the site on its southern boundary with Main Road three times per hour. It is proposed that at least one of these services per hour is diverted through the site to provide all residents with access to at least one bus per hour which is accessible within a 400m walk, however, at this stage this has not been secured.

The “Vision” scenario focuses on reducing vehicle trip generation and increasing trips made by walking, cycling and public transport. Census 2011 data for the Hoo Peninsula showed that the private car mode share for journeys to work is 73% and this is what has been applied to trips for all journey purposes (other than education) to derive a reasonable worst case or “business as usual” scenario. However, the vision for the site is for a much lower percentage of trips to be made by private car. It is believed that a shift to 55% of trips being made by private car is achievable with trips shifting proportionally to either bus, walking or cycling.

The TA assumes that trip generation associated with the community use would mostly come from residents living at the Proposed Development and if it does generate trips externally, these are likely to be outside the peak hours. Therefore, for the purpose of this assessment it is assumed the community use will generate 0 vehicle trips in the AM and PM peak hours. It is also assumed that the commercial space proposed at the Site will be used for a small retail unit such as a convenience store. To understand the potential trip generation for a small retail unit, the TRICS database has been utilised to derive appropriate vehicle trip rates.

The TA assumes all trips associated with the proposed commercial space in the AM and PM peak hours would be linked or diverted trips and, therefore, it is considered that there would be no ‘new’ trips associated with the retail use but there would be diversion of existing trips.

The distribution of vehicle trips for residential, work and employers, education and education escort, shopping and personal business, recreation and total vehicle distribution for all purposes combined are set out within the TA.

Junction Impact Assessment

Junction modelling – site access roundabout

The Transport Assessment considers the operation of the proposed site access roundabout, which would introduce a new fourth arm to the existing Main Road /

Main Road Hoo / Main Road Chattenden junction to facilitate vehicular access into the development site. Traffic surveys undertaken on 4 June 2025 form the basis of the assessment, with traffic growth, committed developments and proposed development flows added. Modelling of 2032 baseline plus development traffic for both the BaU and vision scenarios demonstrates that the redesigned roundabout, incorporating the new site access arm, is forecast to operate well within capacity in all tested peak periods.

Junction Modelling - Main Road Hoo / Ratcliffe Highways

The Transport Assessment outlines junction modelling for the Main Road Hoo / Ratcliffe Highway roundabout, noting that Ratcliffe Highway—formerly part of the A228 prior to the opening of Peninsula Way—runs alongside the proposed development and is expected to provide a secondary vehicular access. A 2025 base year model was developed in PICADY (Junctions 11) using geometry measured from satellite imagery and traffic count data collected on 4 June 2025. Results indicate that the junction currently operates well within capacity during both AM and PM peak periods. Future modelling applying 2032 baseline flows to the existing junction layout shows that, under both the BaU and vision development scenarios, the junction is forecast to continue operating well within capacity in both peak hours.

Junction Modelling - A228 Peninsula Way / Main Road Hoo Roundabout

The Transport Assessment evaluates the A228 Peninsula Way / Main Road Hoo roundabout, a key four-arm junction serving both the Hoo Peninsula and the village of Hoo St Werburgh, and notes its identification for mitigation within the Regulation 19 Medway Local Plan. A 2025 ARCADY model based on satellite-derived geometry and June 2025 traffic surveys shows the junction currently operates within capacity, although Main Road Hoo is nearing capacity in the AM peak. Forecasting to 2032, the existing layout is shown to be over capacity on most arms before development traffic is applied. Modelling incorporating the consented MedwayOne mitigation scheme—comprising a third-lane flare on the A228 Peninsula Way (south-west arm) and an extended flare on Main Road Hoo—demonstrates a substantial improvement, with all arms operating within capacity in the AM peak and only the A228 Peninsula Way North arm exceeding capacity in the PM peak. When 2032 baseline plus development flows are applied, the junction remains broadly within capacity under the BaU scenario, though the A228 Peninsula Way North arm experiences additional PM peak pressure. Under the Vision scenario, slight capacity improvements occur relative to BaU, but overall performance remains below the 2032 baseline, with the greatest impact again at the A228 Peninsula Way North arm in the PM peak, indicating that further mitigation may still be necessary.

Proposed Mitigation Scheme

A mitigation scheme is proposed at the A228 Peninsula Way / Main Road Hoo roundabout to achieve a 'nil-detriment' impact when factoring in 2032 baseline and development traffic. The mitigation scheme comprises the introduction of a 25-metre nearside flare to create a third lane on the Peninsula Way (north-east) arm, an extension of the flare on Main Road Hoo to 56 metres, and the addition of spiral road markings to improve vehicle circulation. Modelling of the Business-as-Usual and

Vision scenarios demonstrates that this mitigation strategy is forecast to offset the impacts of the proposed development, maintaining junction performance at levels comparable to the 2032 baseline with the MedwayOne scheme in place.

Regulation 19 Local Plan

The TA advised that as part of the Strategic Transport Assessment supporting the Regulation 19 emerging Local Plan, a mitigation scheme is proposed to upgrade the A228 Peninsula Way / Main Road Hoo roundabout, with further details set out in the “Strategic Transport Assessment – Junction Modelling and Mitigation Report.” The current proposal is to replace the existing roundabout with a four-arm signal-controlled junction. Should the Regulation 19 Local Plan be adopted and its mitigation scheme progressed, the applicant confirms they would accept an obligation to contribute proportionally towards the wider strategic scheme rather than delivering a standalone mitigation scheme.

Junction Modelling - Four Elms Roundabout

The Transport Assessment considers the operation of the Four Elms Roundabout in Wainscott, a four-arm priority junction linking the A289 and A228, and notes that it is also referenced for mitigation within the Regulation 19 Medway Local Plan. A 2025 ARCADY model, informed by satellite-derived geometry and June 2025 traffic surveys, shows existing conditions and forms the basis for future assessment. When 2032 baseline flows are applied, the junction is forecast to operate over capacity on most arms, even before development traffic is added. Modelling incorporating the committed MedwayOne mitigation scheme—comprising a segregated left-turn lane, widening of the circulatory to three lanes on two sides, additional flaring on the A289 Wulfere Way arm, and a staggered signalised pedestrian crossing—demonstrates an improvement, with three out of four arms operating within capacity and only A289 Wulfere Way remaining over capacity. With 2032 baseline plus development flows, the Business-as-Usual scenario shows further deterioration, though capacity issues are already present without the development. The proposed development is assessed to have only a minor overall impact, but additional mitigation may still be required to achieve a nil-detriment outcome. Under the Vision scenario, slight improvements occur compared to BaU; however, performance remains poorer than the 2032 baseline, again indicating the likely need for further mitigation.

Proposed Mitigation Scheme

A mitigation scheme is proposed for Four Elms Roundabout to achieve a ‘nil-detriment’ impact, comprising increased entry widths on the Four Elms Hill and B2108 Hoo Road arms, along with an extended flare on the A289 Wulfere Way arm. Since the original Transport Assessment, a Stage 1 Road Safety Audit has been undertaken and the design updated accordingly. Modelling of 2032 baseline plus development flows shows that, while the mitigation does not fully achieve nil-detriment under the Business-as-Usual scenario, it provides meaningful improvements in queue lengths and delay, and the TA considers the development’s impact remains well below the National Planning Policy Framework’s threshold for a ‘severe’ impact. Under the Vision scenario, the mitigation achieves nil-detriment in the AM peak but not in the PM peak, though overall impacts remain minor. The

Regulation 19 Local Plan proposes a more extensive strategic scheme—introducing signalisation on three approaches, dedicated left-turn filter lanes, and a reconfigured Hoo Road arm.

Strategic Road Network – M2 Junction 1

The Transport Assessment Addendum considers the impact of the proposed development on the Strategic Road Network at M2 Junction 1. While most trips from the site are expected to travel to destinations within the Medway Towns, a smaller proportion—primarily work and leisure trips—would route via M2 Junction 1. Based on the distribution analysis, the junction is forecast to experience only a very small increase in vehicle movements from the development. Under the Business-as-Usual scenario, the uplift equates to fewer than one additional vehicle in the AM peak hour and approximately one additional vehicle every 30 seconds in the PM peak hour. In the vision scenario, this impact is marginally lower, with fewer than one additional vehicle in the AM peak and around one additional vehicle every 50 seconds in the PM peak. Overall, the development's impact at M2 Junction 1 is assessed as imperceptible.

Transport Vision

The Transport Assessment Addendum sets out the transport vision for the development, reflecting the latest National Planning Policy. The vision is underpinned by principles focused on reducing the need to travel, prioritising sustainable transport choices, and delivering high-quality walking, cycling and public transport provision both within the site and between the site and Hoo St Werburgh. Key elements include promoting active travel through comprehensive walking and cycling networks, diverting Arriva bus service 191 through the development to provide frequent and accessible public transport, supporting shared mobility via an on-site car club, and integrating community and open spaces to encourage social wellbeing. Retail and community space will be provided on-site to supplement existing amenities in the village of Hoo St Werburgh. This will help to reduce the need for residents to travel off the Peninsula and allow a proportion of daily activities to be undertaken by active travel (walking and cycling). A new footpath, connecting the site to Main Road will ensure access to the local primary and secondary school is easily achievable by walking and cycling, meaning a large proportion of school trips can be made by active travel. These interventions will also provide benefits to physical and mental wellbeing. The vision anticipates that most residents will live within 400 metres of a regular bus service and benefit from excellent connections to local schools and amenities, helping reduce reliance on private car travel. Two mode share scenarios underpin the assessment: a Business-as-Usual scenario, with a forecast vehicle mode share of 73%, and a Vision scenario, targeting a reduced vehicle mode share of 55% through increased use of active and sustainable modes.

Framework Travel Plan

The Framework Travel Plan outlines a comprehensive package of measures designed to reduce private car use and promote sustainable travel for residents of the development. Central to this is the provision of Travel Information Packs for all new residents, supported by ongoing travel awareness campaigns and regular

communication of sustainable travel options. The plan promotes active travel through high-quality walking and cycling connections, on-site cycle parking, cycle forums, a Bicycle User Group, and potential discounts for bicycle purchases. Public transport use is encouraged through the proposed diversion of bus service 191 through the site, high-quality bus stops, up-to-date service information and discount initiatives. Car sharing is supported through promotion of existing schemes, while messages on the environmental and health impacts of car use aim to encourage behavioural change. Electric vehicle uptake is enabled through EV-ready infrastructure in line with Building Regulations. The plan also seeks to reduce the need to travel by supporting home working through broadband provision and community workspaces, providing on-site retail and community facilities, and encouraging home shopping services. Collectively, these measures aim to foster long-term sustainable travel habits and minimise traffic impacts, with the Travel Plan Coordinator responsible for implementation over a five-year period post-first occupation.

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 includes access improvements, upgraded footway and cycle links. Mitigation measures are proposed to the A228 Peninsula Way/Main Road Hoo and Four Elms Roundabout which are also identified in the Strategic modelling for mitigation, embedded within the Local Plan transport strategy, with proportionate S106 contributions from the development secured to help fund these improvements.

Overall, if the development were to be considered acceptable 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, emerging Policies SA8, 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 not been submitted with a Climate Change and Energy Efficiency Statement, however, the design and access statement has a sustainability strategy. Due to the fact that this application is outline only with only access detailed it is considered that the details of the final climate change and energy strategy will be determined at the reserved matters stage, if the application were to be considered acceptable. Despite this, there are a number of measures and opportunities that have been set out within the design and access statement that could be utilised within the dwellings. These measures will also contribute to reducing the energy demand and emissions of the dwellings.

Such measures include:

Taylor Wimpey – 2025 Future Homes standard home:

- Photovoltaic panels;
- Wastewater heat recovery;
- Thermal brick lintel;
- Well insulated walls;
- Smart heating controls;
- Underfloor heating;
- Air source heat pump;
- Triple glazing;
- Airtightness;
- Electric vehicle charging point;
- Use of high quality materials.

Further details of these measures would be requested as a condition, if the application were to be considered acceptable and, therefore, the development would be in accordance with emerging Policy DM6 of the (Regulation 22) Medway Local Plan 2041 and paragraphs 161 and 164 of the NPPF.

Bird Mitigation

As the application site is within 6km of the North Kent Marshes SPA/Ramsar Sites. As 550 dwellings are proposed for this development, it is considered that recreational impacts would occur in the protected areas, but it is agreed that this is not functionally linked land for ecological impacts. Functionally linked land is land outside the designated sites but supports species/features that the site has been designated for. The 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 at the time of submission, 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 would need 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, emerging Policy S3 of the (Regulation 22) Medway Local Plan 2041 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.

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 (December) 2025:

NON-FINANCIAL

- Min 30 % affordable homes
 - 62% affordable rent
 - 38% shared ownership
- Provision of a road link with no ransom strip up to the boundary with the adjacent Land West of Hoo site that will provide pedestrian, cycle and bus linkages through the site going forward.
- Implementation programme and delivery of off site highway works.

FINANCIAL

- Up to £102,141.00 towards improvements to facilities and equipment to Hoo library and/or the community mobile library serving the Hoo Peninsula (£226.98 per unit x 450 units).
- Up to £113,328.00 towards community facilities in Hoo including but not limited to a new community centre in Pottery Road and a new community hub (£251.84 per unit x 450 units).

- Up to £48,438.00 towards youth development across the Hoo Peninsula including but not limited to development of new youth facilities and enhancements of existing provision ensuring access to essential equipment and materials, and engagement of trained instructors (£107.64 per unit x 450 units).
- Up to £1,578,037.50 towards improvements and expansion of open space and outdoor sports facilities at Deangate Community Park and/or Cockham Wood Parkland and/or Hoo Wetlands and/or Hoo Common and/or Kingshill Recreation Ground, Hoo (£3,506.75 per unit x 450 units).
- Up to £33,750.00 towards improvements and enhancements to Public Rights of Way (PRoWs) RS104, RS105 and RS100 including signage, drainage, wayfinding and access improvements, lighting surfacing and vegetation management if required. (£75 per unit x 450 units).
- Up to £166,414.50 towards improved civic space and gateways including greening, street furniture, paving, lighting and signage in the Parish of Hoo and Chattenden (including greening, street furniture, paving, lighting, signage etc (£369.81 per unit x 450 units).
- Up to £150,583.50 towards improvements to Hoo Sports Centre including but not limited to the development of gender-neutral changing area including improved shower facilities with increased accessibility for families, schools and disability users which enable the help and supervision of carers and development of a yoga studio to support mental well-being of residents. (£334.63 per unit x 450 units).
- Up to £107,028.00 towards waste containment facilities the maintenance and improvement of local bring centres and waste education and promotion. (£237.84 per unit x 450 units).
- Up to £129,204.00 towards social care services to meet the needs of the increased, aging population within 3 miles of the development including but not limited to community equipment provision, day care and activity services, personal care assistants, carer support services, home care provision and technology-enabled care solutions. (£287.12 per unit x 450 units).
- Up to £900,000.00 toward Health – Primary Care towards a new healthy living centre in the Parish of Hoo and Chattenden to provide appropriate level of enhancement to accommodate increase in patient numbers. (£2,000 per unit x 450 units).
- Education
 - a. Up to £1,365,705.00 towards the provision of nursery education within a new two-form entry or three-form entry primary school in Hoo;
 - b. Up to £3,352,185.00 towards the provision of primary education within a new two-form entry or three-form entry primary school in Hoo;

- c. Up to £2,694,451.89 towards the provision of secondary education within a new six-form entry secondary school in Hoo;
 - d. Up to £429,737.14 towards the provision of sixth form education within a new six-form entry secondary school in Hoo.
- Up to £4,296,600.00 towards a package of transport mitigations including but not limited to Four Elms roundabout, Sans Pareil roundabout, local roundabouts in Hoo and sustainable transport improvement on the Hoo Peninsula (£9,548 per unit x 450 units).
 - Up to £756,769.50 towards a strategic environmental programme on the Hoo Peninsula to protect designated sites and areas of significant flood risk, either now or in the future. To include conservation and enhancement of Lodge Hill SSSI, the Medway Estuary and Marshes SPA, Ramsar site and SSSI. (£1,681.71 per unit x 450 units).
 - Up to £151,870.50 for Bird Disturbance Mitigation (SAMMs) to make financial contribution to take mitigating measures to protect wintering birds habitat areas from the additional footfall/visitors that will result from the development. (£337.49 per unit x 450 units).

These requests above have been made in accordance with the Medway Developer Contribution and Obligations Guide (December 2025) which forms part of the evidence base for the emerging Local Plan. These have been assessed in terms of the tests as set out in paragraph 58 of the NPPF and Regulation 122 the Community and Infrastructure Levy Regulations 2010.

Since it is considered that these contributions are necessary to make the development acceptable in planning terms, a failure to secure these contributions would result in planning harm. It is assumed for the purposes of this report that the appropriate s106 agreement will be entered into. A failure to enter into a s106 agreement so as to secure these contributions may give rise to a further reason for refusal.

Planning Balance

Section 38(6) of the Planning and Compulsory Purchase Act 2004, together with section 70(2) of the Town and Country Planning Act 1990 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 Hoo. As such, and as recognised above, it conflicts with the spatial strategy of the adopted Medway Local Plan (2003), including Policy BNE25, 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. It is also in conflict with spatial policies in the NHP. Taken together, the identified policy conflict means that the development conflicts with the adopted Development Plan when read as a whole.

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 important policies for determining the application are deemed to be 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.

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. 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 450 new dwellings towards housing land supply, of which 25% would be affordable contributing to the identified need in the Medway area at a time when delivery is well below the annual requirement. It is anticipated that the development would be delivered over approximately a 10 year (years 1-5 and 6-10 over the plan period of the emerging Local Plan) build-out programme. The proposal would, therefore, contribute significantly to the number of dwellings delivered in Medway in the next ten years. 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 emerging Local Plan) to the supply of housing in the forms identified and help address the existing shortfalls. Given the quantum of development involved, and the fact that the delivery of that housing is in accordance

with the strategy in the emerging Local Plan, very substantial positive weight is attached to the provision of market and affordable housing.

The application would also provide 500m² of commercial space and 500m² of community space, providing existing and proposed occupants with convenience top up shopping and community space for people to meet and carry out activities. Positive weight is attached to this provision.

Upgrades to an existing farm track that runs between the Hundred of Hoo Primary School and the Hundred of Hoo Academy would provide a footway/cycle route to allow a direct walking route to the schools and wider village of Hoo. The primary access road through the site would have pedestrian and cycle facilities. Further upgrades are proposed for footpath provision on Main Road. This would 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.

At a reserved matters stage, dwellings should be provided generous sized plots and for the majority of house types, the internal layout should also allow home working to be facilitated. This would contribute 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 contribute financially, through the section 106 agreement, to enable the provision of mainstream education within a new school (within a radius of 2 miles from the development site for Nursery and Primary provision) and/or SEND education within Medway, allowing for the development to be mitigated satisfactorily.

By financially contributing to allow for the needs of new residents to be met, and supporting sustainable patterns of growth, the financial contribution for education represents a valuable benefit.

Environmental

The proposed development will incorporate a high level of energy efficiency, using Taylor Wimpey – 2025 Future Homes standard home approach and all dwellings would be equipped with electric vehicle charging points. Ideally the measures that have been set out would achieve a reduction from 2021 Part L baseline. While a large variety of 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.

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, emerging Policy S2 of the Regulation 22 Medway Local Plan 2041 requires development to achieve a minimum 10% BNG, consistent with national legislation.

The submitted information indicates that proposals are anticipated to result in a Biodiversity Net Gain of over 10% net gain. Commitment to a quantitative biodiversity net gain on site would be secured by condition, underpinned through planning policy for this application. The projections exceed emerging policy requirements and would contribute 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 16.60 hectares of open space, including play areas, SuDS features, informal and formal open space and allotments, all of which would be accessible to the wider community through enhanced connections to the surrounding area. This would provide meaningful benefits for health, wellbeing and community cohesion. 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 scheme also conflicts with paragraph 187 of the NPPF, by resulting in the loss of open countryside and approximately 6.8ha of grade 3a Best and Most Versatile (BMV) agricultural land and 21.5ha of grade 3b (albeit not of the highest quality, with no Grade 1 or Grade 2 BMV being lost). Given the quality and extent of BMV lost, and the fact that 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, limited negative weight is given the loss of BMV.

It is also noted that the proposed upgrades to pedestrian links, especially when viewed in conjunction with the spine road link through the adjacent site (Gladmans), would enhance wider opportunities for walking and cycling beyond the site boundary. The site is served by nearby bus services, and the primary route through the development has been designed to accommodate potential future bus provision, thereby supporting a further 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. The proposal is considered to support objectives of Section 9 of the NPPF (promoting sustainable transport) and emerging Policies SA8 and T26 of the Regulation 22 Medway Local Plan 2041. 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 HHH8) 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. This site is considered as part of the planned extension of Hoo Village which would benefit from planned investment in infrastructure. It is also conveniently located adjacent to the existing village boundary. Hoo is considered to be an existing significant settlement, of over 12,000 residents, and planned expansion will provide targeted investment in specified areas.

However, whilst the supporting text to emerging Policy SA8 acknowledges that the level of development planned for Hoo and Chattenden will involve “significant change” (14.9.7), it is said that growth will be planned at a strategic level across the parish, and delivered through “distinct, but connected neighbourhoods and villages”. It is emphasised that “it is important to ensure the distinct identities of Hoo and Chattenden”, and “development must retain the separation of the historic villages of Hoo and Chattenden and avoid coalescence”. Accordingly, “a landscape buffer is a key part of the strategic planning, providing for views over open landscape” (14.9.8). Figure 14 of the emerging Local Plan, ‘Hoo St Werburgh and Chattenden Concept Plan’, illustrates the importance of a strategic green corridor between the two settlements and the proposed development (by virtue of the parameter plans and the location of developable areas) would be inconsistent with emerging Policy SA8 of the Regulation 22 Medway Local Plan 2041 and Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023-2040. This harm is given significant weight.

Conclusion on Planning Balance and Reason for Refusal

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. Whilst the proposal would conflict with the spatial strategy of the adopted Local Plan, including Policies BNE25 and H11, it would be consistent with the spatial strategy of the emerging local plan, and delivery would help the Council meet its identified housing need.

The less than substantial levels of harm to heritage assets is outweighed by the public benefits. There is considered to be no unacceptable harm 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.

Overall, the proposal would give rise to a number of benefits, as well as identified harms. When applying the tilted balance under paragraph 11(d) of the NPPF, in

consideration to the significant harmful impacts the development would have in terms of the proposed location of the built form and heights as shown on the submitted parameter plan, that would erode the distinct identities of Hoo and Chattenden by coalescence and that the development would not provide a meaningful landscape buffer that would provide for views over open landscape and prevent the coalescence of these two villages, as shown within figure 14 of the emerging Local Plan 'Hoo St Werburgh and Chattenden Concept Plan.

Although the principle of residential-led development on the site is supported, the proposal fails to provide a sufficient and effective landscape buffer capable of functioning as part of a strategic landscape corridor and would also adversely and unnecessarily exacerbate landscape and visual impacts as a result of developing this site. The proposal would result in the perceived coalescence of Hoo and Chattenden, and as a result would not successfully maintain the separate identity and character of those settlements. As such, the Development would conflict with the underlying objectives of Policy BNE25 of the adopted Local Plan; Policy H008 of the Hoo St Werburgh and Chattenden Neighbourhood Plan 2023–2040; Draft Policies SA8, and S4 of the Regulation 22 Medway Local Plan 2041. It is considered that the adverse impacts significantly and demonstrably outweigh the scheme's benefits when assessed against the policies of the NPPF taken as a whole.

This is a judgment reached without taking into account the harm caused if the section 106 to provide all of the planning obligations were not to be agreed. A failure to secure the obligations sought in a section 106 agreement would give rise to a potential further reason for refusal.

The application is being referred for Committee determination due to the extent of representations received and due to the proposal being a major development. It should be noted that the applicant has submitted an appeal against the non-determination by the Council of the application and, therefore, the Council is no longer in a position to determine it. Accordingly, this committee meeting is to decide what the Council's decision would have been if it had been able to determine the application.

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/>