



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

MEDWAY LOCAL PLAN 2041 EXAMINATION IN PUBLIC

Matter 2 Hearing Statement – Vision, Spatial Development Strategy and Strategic Objectives

Iceni Projects Limited on behalf of Barratt David Wilson Kent (“BDW”) (Representor ID: 915)

Introduction

1. This Hearing Statement has been prepared on behalf of Barratt David Wilson Kent (“BDW”) in respect of the Matters, Issues and Questions (Document ref. MLP/ED15) published as part of the Examination in Public (“EiP”) into the emerging Medway Local Plan 2041, prepared by Medway Council (“the Council”).
2. BDW is part of Barratt Redrow, the largest housebuilder in the country, delivering over 17,000 homes annually across the UK. BDW is one of the largest and most prolific developers in Kent with a proven track record of delivering significant new residential communities within the area’s most prominent and high profile key strategic locations. BDW, therefore, has unrivalled experience in delivering residential development in the Kent area.
3. BDW controls a key 16Ha landholding known as “Land north of Rede Court” (Site ref. SNF1), which forms part of the draft allocation Land west of Strood under Policy SA6. Land west of Strood is, one of the Local Plan’s most important and strategic locations upon which the spatial strategy is predicated. Based on BDW’s desire to submit an application on its landholding shortly, we believe that the Site can come forward as the first phase of development on Land west of Strood.
4. **BDW is supportive in principle of the draft Local Plan.** In this regard, BDW considers Land at Strood to be a key component of what it considers to be the only realistic spatial strategy capable of meeting Medway’s housing needs in full. BDW’s position on key questions posed by the Local Plan Inspectors is outlined in this submission.

Matter 2: Vision, Spatial Development Strategy and Strategic Objectives

Spatial Development Strategy

Q2.4: What are the key factors that informed and shaped the selection of the spatial development strategy of the Plan over other reasonable approaches?

5. BDW considers that the spatial development strategy chosen by the Council of a “Blended Strategy” over other reasonable approaches is sound. There are a number of key factors which have informed and shaped the selection of the spatial strategy which we expand upon below.

6. The NPPF (2024), which this Plan is being examined under, requires local authorities at paragraph 61 to significantly boost the supply of homes, with a sufficient amount and variety of land to come forward where it is needed. In line with paragraph 11b), plans should *as a minimum*, meet the objectively assessed need for housing and other uses, allocating sufficient sites to deliver the strategic priorities of the area, as required under paragraph 23. As such, meeting the housing need in full, is a key factor in determining what the preferred spatial strategy should be. The Blended Strategy would meet housing needs in full, recognising that reliance on brownfield and regeneration sites alone will not deliver the scale of housing required.
7. The Council is also required to demonstrate a realistic, deliverable trajectory and a five-year supply of deliverable sites, in accordance with paragraphs 72 and 78 of the NPPF 2024 and the Planning Practice Guidance¹ (“PPG”). BDW’s position throughout the plan process has been that a strategy over-reliant on brownfield/urban regeneration sites creates a systemic risk of under-delivery and would be highly unlikely to deliver anything close to a five-year supply in the first five years, even with a stepped trajectory.
8. A greater spatial balance across the administrative area, reducing reliance on urban sites and the Hoo Peninsula in favour of a strategy that could utilise better connected Green Belt land adjoining Strood has the ability to deliver sustained growth throughout the plan period, as well as higher levels of affordable housing and other enhanced societal benefits.
9. Under paragraphs 124 and 125 of the NPPF 2024, the Council is required to make effective use of land. The Council has adopted the required sequential approach of utilising suitable brownfield sites, but acknowledge that this land alone is not sufficient to meet housing needs.
10. Where an authority cannot meet its needs through other means, exceptional circumstances may justify boundary alterations (in line with paragraphs 145–147 of the NPPF 2024), with a sequential approach favouring previously developed land, then grey belt, then other Green Belt land (paragraph 148). Through being identified as grey belt land via the Council’s Green Belt Assessment (June 2025) (please see response to Q2.5 below), Land West of Strood is sequentially preferable in ensuring that housing needs are met in full across the Plan area. The need to release land from the Green Belt is therefore a critical factor in the Council’s development of the preferred spatial strategy.
11. Finally, cross-boundary considerations are an important factor in determining Medway’s spatial strategy. Medway Council and Gravesham Borough Council (“GBC”) are closely intertwined, as evidenced through the confirmation from the Devolution Priority Programme that Medway and Gravesham will combine with Dartford to create the new North Kent unitary authority from April 2028. As such, the spatial strategy chosen reflects this close relationship, with Land West of

¹ Paragraph: 002 Reference ID: 68-002-20241212 <https://www.gov.uk/guidance/housing-supply-and-delivery>

Strood offering a unique opportunity for a comprehensive urban expansion which is still able to come forward through smaller landholdings to deliver both at scale and in the short term.

12. Taken together, these factors lead logically to a strategy of greater spatial balance across urban regeneration, suburban growth and strategic growth locations i.e. a “Blended Strategy”. BDW supports the resulting distribution, which avoids over-reliance on any single source of supply and is both balanced and realistic, ensuring the Plan is positively prepared, justified and in accordance with national policy.

Q2.5: How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?

13. BDW considers that the Plan and its supporting evidence set out an adequate and proportionate justification for the preferred strategy, consistent with paragraphs 32 and 36 of the NPPF 2024.
14. The approach to the spatial strategy is set out at section 3.1 of the Medway Local Plan 2041 Regulation 19 version. It confirms how the strategy reflects the strategic objectives of the Plan, applying a “brownfield first” approach to deliver around 40% of housing needs alongside 30% directed towards sustainable urban extensions, such as Land West of Strood and 30% towards larger villages.
15. The Sustainability Appraisal (“SA”) has evolved from the Regulation 19 consultation stage, which now responds to the deliverability limitations of the alternatives tested at Regulation 18. The Regulation 18 consultation tested a more brownfield-dependent, blended approach that precluded Green Belt development over-relied on (a) brownfield sites unlikely to be deliverable in full within the plan period, and (b) greenfield locations (notably parts of the Hoo Peninsula) whose infrastructure requirements cast serious doubt on delivery within the plan period. The iterative approach to the SA shows the Council’s recognition that the evidence clearly demonstrated the need to pivot in the blended approach, away from a more brownfield dependent strategy towards a more balanced strategy, which could maximise the housing and employment societal benefits.
16. The SA recognises the positive contribution of the Land West of Strood (including SNF1) to the spatial strategy. BDW considers the SA now provides a robust assessment of the spatial growth options that justifies the chosen Blended Strategy, in accordance with paragraph 33 of the NPPF 2024.
17. As confirmed through the Green Belt Review (June 2025), there are parts of the Green Belt in the Plan area which are better-connected (i.e. land adjoining Strood), which has been identified as grey belt land, not strongly performing against Green Belt purposes (a), (b) and (d). These areas offer the potential for sustained early delivery, higher levels of affordable housing (consistent with the Golden Rules at paragraphs 67 and 156–157 of the NPPF 2024) and enhanced societal benefits.

Q2.6: How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

18. The strategy responds to Medway's principal constraints and opportunities as follows, with the response reflected in the relevant strategic and site allocation policies.

Constraints

19. **Green Belt.** The spatial strategy directs growth first to non-Green Belt and previously developed land and only releases Green Belt land where exceptional circumstances are demonstrated, prioritising grey belt, in accordance with paragraphs 145-148 and 155 of the NPPF 2024. This is reflected in Policy S7 (Green Belt) and the identification of Land West of Strood as grey belt within Policy SA6.
20. **International and national environmental designations.** The North Kent Estuary and Marshes SPA/Ramsar sites and SSSIs constrain development on and around the Hoo Peninsula and estuary; this is reflected in the HRA-informed policies (Policies S2 and S3) and the balance struck within the distribution of growth.
21. **Flood risk.** A sequential, risk-based approach steers development away from areas of highest flood risk (in line with paragraphs 170–175 of the NPPF 2024), which supports the direction of a substantial proportion of growth to well-located, lower-risk suburban land such as Land West of Strood (which lies within Flood Zone 1).
22. **Heritage.** The strategy conserves and enhances the historic environment, including designated and non-designated heritage assets and their settings, in a manner appropriate to their significance (as required under paragraphs 203 and 212 of the NPPF), with this reflected in the design, place-making and heritage requirements attached to the allocation policies, including that of Land West of Strood.

Opportunities

23. **Urban regeneration and effective use of land.** The spatial strategy maximises brownfield and under-utilised land in the urban areas, whilst acknowledging that this is not sufficient to meet housing needs in full, nor does it deliver an appropriate mix of housing types for the community in accordance with paragraph 61 of the NPPF 2024.
24. **Sustainable, well-connected suburban extensions.** Therefore, the strategy takes the opportunity to allocate extensions that are well related to existing services and public transport, consistent with paragraphs 110 and 115 of the NPPF 2024 on directing significant development to sustainable locations. Land West of Strood, approximately 1.5km from Strood town centre and served by rail and bus, exemplifies this.
25. **Grey belt.** The strategy takes the opportunity presented by grey belt land that does not strongly contribute to Green Belt purposes, reflected in Policy SA6 to allocate a sustainable, cross-boundary site capable of delivering consistently across the Plan period.

26. **Larger-scale strategic growth.** The strategy takes the opportunity for well-planned larger-scale growth (including Land West of Strood), recognising that the supply of large numbers of new homes can often best be achieved through planning for larger scale development, in accordance with paragraph 77 of the NPPF 2024, supported by necessary infrastructure.

27. The spatial strategy clearly responds to the constraints and opportunities of Medway and provides a justified and positively prepared approach to delivering development.

Strategic Objectives

Q2.8: How do the strategic objectives support the spatial development strategy and the policies set out in the Plan?

28. BDW supports the Plan's Strategic Objectives, which are structured around four themes. BDW considers that these objectives directly support, and are mutually reinforcing with, the spatial development strategy and the Plan's policies in the following ways:

Strategic Objective	How the spatial strategy supports the strategic objectives
Prepared for a sustainable and green future Climate resilience and net zero; sustainable travel choices; conserving the natural and historic environment; effective use of natural resources.	• Directs a substantial tranche of growth to Land West of Strood, a well-connected suburban location (circa 1–1.5km / 20-minute walk from Strood town centre, served by frequent bus routes and Strood rail station), reducing the need to travel and enabling genuine modal choice. • Land West of Strood will deliver a landscape-led, masterplanned extension that lies wholly within Flood Zone 1, avoiding the highest flood risk and the most sensitive estuarine designations, while securing Biodiversity Net Gain and green/blue infrastructure. • Delivery of new homes, meeting needs in full, built to high sustainability and energy-efficiency standards, contributing to the net zero pathway.
Supporting people to lead healthy lives and strengthening communities Homes of all types, including affordable and specialist housing; reducing health inequalities; strengthening centres and services.	• Land north of Rede Court will, as part of Land West of Strood, provide circa 360 homes within the wider 3,190 dwelling allocation, including policy-compliant affordable housing and a genuine mix of sizes and tenures – notably family housing not deliverable on largely flatted urban regeneration sites. • Land north of Rede Court will comprise early delivery in the first part of the plan period widens housing choice quickly and helps address affordability and health inequalities.

	• A set out with policy, Land West of Strood will deliver landscape-led design with accessible green infrastructure, walking and cycling links and supporting community/education facilities within the wider Policy SA6 masterplan, supporting healthier, connected lifestyles.
Securing jobs and developing skills for a competitive economy Boosting the local economy and inward investment; higher-value jobs and skills; infrastructure for business growth.	• Land West of Strood will generate significant short-term construction employment and supply-chain activity, and long-term expenditure supporting local businesses and services. • If forms part of a cross-boundary allocation that includes employment, education and a local centre, contributing to a competitive economy and reducing out-commuting. • Helps attract and retain workforce by delivering the range and affordability of homes Medway needs to support economic growth.
Boost pride in Medway through quality and resilient development Meeting needs in full with phased infrastructure; respecting local identity; directing growth to the most suitable locations; making best use of brownfield; high design quality.	• As a key component of the spatial strategy, Land West of Strood enables housing and economic needs to be met in full, with appropriately phased infrastructure secured through the PolicySA6 masterplan, supply that a brownfield-only strategy could not deliver, particularly in the first five years of the Plan. • Delivered on grey belt land identified in the Green Belt Review as not strongly performing against Green Belt purposes, providing a robust, defensible boundary and directing growth to a suitable, sustainable location. • Landscape-led masterplan and design coding respond to local character and deliver a high-quality, resilient new neighbourhood.

29. BDW considers that, insofar as they relate to Land West of Strood, the strategic objectives and the spatial strategy are aligned, and that the objectives provide a clear framework that the policies are then designed to deliver.

Q2.10: The Plan sets out that the spatial distribution of new development within Medway is circa. 40% urban regeneration; circa 30% suburban and circa 30% rural (mainly on the Hoo Peninsula). Please could the Council explain, with reference to the evidence submitted, how and why this spatial distribution is the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.

30. Whilst this question is for the Council to answer, BDW would add that, as set out in our response to Q2.6, the spatial strategy responds to Medway's principal constraints and opportunities, which has resulted in a sustainable, deliverable and appropriate approach to the delivery of new development.

Sustainability

31. The circa 40% urban regeneration component prioritises previously developed and under-utilised land and optimises density in the most accessible locations, consistent with the effective use of land policies at Framework paragraphs 124–125 and 129–130, and with the environmental objective of sustainable development.
32. However, as recognised by the Council, this is not sufficient to meet housing needs. As such, approximately 30% of growth is directed to well-connected extensions that are sustainable locations in transport terms, such as Land West of Strood. As noted within Policy SA6, development in this location will prioritise active travel and support an integrated public transport system, providing sustainable linkages through to Strood Town Centre whilst also delivering infrastructure on-site to reduce car dependency.

Deliverability

33. A balanced distribution across three sources avoids over-reliance on any single source of supply and provides the variety of sites required by paragraphs 61 and 72 of the NPPF.
34. Critically, it addresses deliverability in the early part of the plan period. An over-reliance on urban regeneration/brownfield alone would be unlikely to deliver a five-year supply in the first five years, even with a stepped trajectory. The suburban strategic growth component (which includes Land north of Rede Court as part of the Land West of Strood allocation, is available now and can deliver early in the plan period, within the first five years) provides the front-loaded supply needed to demonstrate a deliverable five-year supply at the point of adoption, as required under paragraph 78 of the NPPF 2024.
35. Land north of Rede Court is able to come forward quickly as a first phase of development at Land West of Strood, as part of a wider masterplan, with a planning application currently being prepared.
36. The distribution allows brownfield sites (with longer and less certain lead-in times) and larger-scale rural growth (with significant infrastructure lead-in) to be balanced against readily deliverable suburban sites, producing a more robust and realistic overall trajectory.

Appropriateness

37. The distribution of development has been tested against reasonable alternatives through the iterative SA process and has been demonstrated to be the most appropriate strategy, in accordance with paragraphs 33 and 36(b) of the NPPF 2024. The pivot towards a more balanced distribution was necessary because the evidence showed the more brownfield-dependent alternatives to be undeliverable.

38. It is therefore positively prepared (as it meets needs in full), justified (it is the most appropriate strategy based on the evidence), effective (it is deliverable and supported by cross-boundary working), and consistent with national policy, thereby satisfying all four tests of soundness at paragraph 36 of the NPPF.
39. For these reasons, BDW supports the circa spatial distribution of growth as the most sustainable, deliverable and appropriate approach to delivering new development during the plan period.