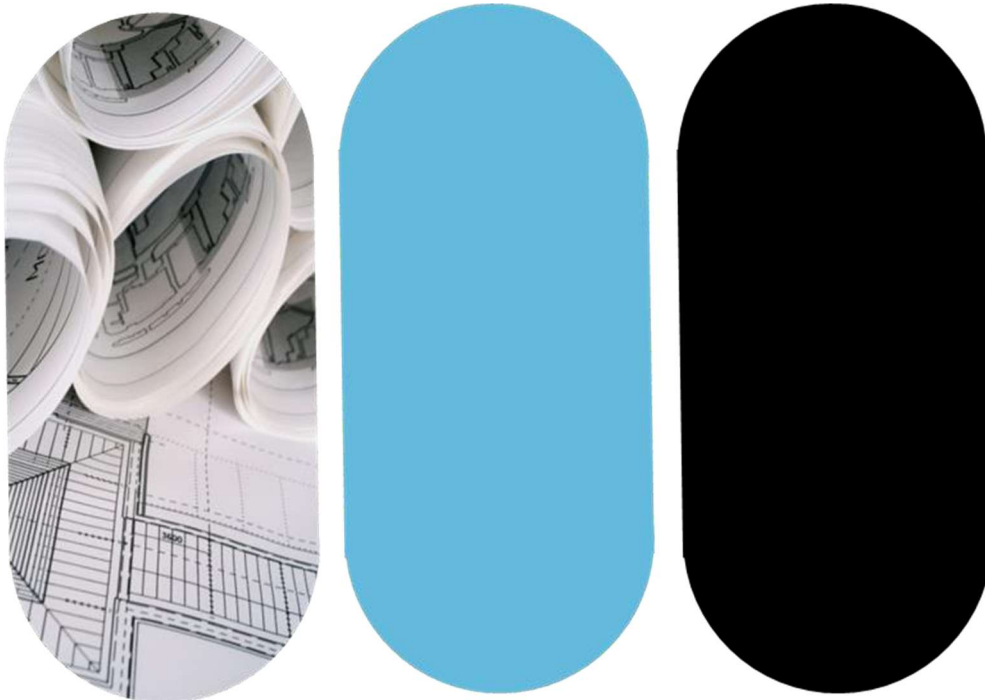




MEDWAY LOCAL PLAN EXAMINATION MATTER 1 HEARING STATEMENT

PREPARED ON BEHALF OF GLEESON LAND

August 2026





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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Gleeson Land in respect of Matter 1 relating to the procedural and legal requirements of Medway Council's (MC) Local Plan.
- 1.2 Gleeson Land has interests in the authority area at Land south of Higham Road and east of Buckland Road, Cliffe (LAA Site ID SR6). The site is not identified as an allocation in the Local Plan but is subject to a recent planning application (ref. MC/26/0194) for up to 100 residential dwellings.
- 1.3 Detail relating to the omission site at Cliffe is provided in our Regulation 19 consultation response (August 2025) and not repeated here. However, it should be noted the reasons identified by the Council for not allocating the site have been fully addressed in the current planning application such that the justification for not allocating it has been shown to be not sound. This includes proximity to the SSSI (no objection from relevant consultees), coalescence between settlements (no objection on this basis from the Council's appointed landscape consultant) and proximity to public transport services (no objection from the Council's appointed highways consultant). It should therefore be considered positively should additional sites be required.
- 1.4 This Matter Statement responds to the Inspectors' questions and have been considered in the context of the tests of 'Soundness' as set out at Para 36 of the NPPF (December 2024). These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.



2. MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS

Q.1.6 How has the Plan been based on a sound process of SA and how has the SA, as set out in supporting evidence, provided an adequate and appropriate consideration and testing of reasonable alternatives to the development strategy approach presented in the submitted Plan?

- 2.1 As set out in our Regulation 19 response, we are concerned the Council has not appropriately assessed reasonable alternatives which consider a housing requirement at a level higher than that of minimum housing needs.
- 2.2 The Sustainability Appraisal (SA, June 2025) section 5.3 sets out how the Council has appraised growth options through the preparation of the Plan. Both at Reg 18 and 19 stages 2no. scenarios were considered, the first (in both cases) being meeting minimum housing needs and the second being minimum housing needs + unmet needs (2,000 homes) from Gravesham.
- 2.3 The second scenarios stem from a long-standing formal request from Gravesham Borough Council (GBC) for Medway to accommodate 2,000 additional homes to assist Gravesham in addressing their unmet needs.
- 2.4 The SA provides a brief overview of the conclusions of the appraisal noting that the minimum growth options perform better on environmental sustainability objectives and the higher growth options better on housing objectives, albeit concluding the options do not perform significantly differently against the SA methodology.
- 2.5 Nevertheless, the option to address unmet need is dismissed outright on the basis that “Medway Council has not received an assessment of land availability from Gravesham Borough Council”. The Council concludes the higher growth options are therefore not justified.
- 2.6 GBC is one of the worst performing (in terms of housing and affordable housing delivery) authorities in England. This is partly a consequence of a lack of plan-making (latest Plan adopted in 2014) and the restriction of the Green Belt which covers most undeveloped areas of the Borough.
- 2.7 GBC has been undertaking a Local Plan Partial Review since before 2018 including Reg 18 consultations in April – June 2018 and October – December 2020. GBC undertook its Reg 19 consultation in April 2026, concluding on 18 August 2026 following extensions due to missing evidence base documents. Whilst it is not for this Examination to consider whether the Gravesham Local Plan will be “sound”, this remains a risk. The Plan includes a heavily reliance on strategic regeneration sites which have experienced viability and delivery issues in recent



- years. Added to this is the recent Secretary of State dismissal of the redevelopment at Northfleet Harbourside (ref. APP/K2230/V/25/3360355) which the Plan relies on for circa. 3,500 dwellings.
- 2.8 There is, in our view, a significant risk that the Gravesham Plan cannot progress as drafted. If it does, it could include a substantial gap between minimum housing needs and housing requirement / supply on the basis of the above. Unmet needs are likely to arise on this basis.
- 2.9 We consider further work is needed to adequately test a reasonable alternative of addressing unmet needs from Gravesham, noting a formal request has been made, and these unmet needs are likely to arise.
- 2.10 Further, there is no justification provided as to why the Council has not considered alternative scenarios which seek to set a growth option at a level higher than minimum housing needs, regardless of the unmet need position of Gravesham (or others). The SA approach pre-determines the Council's strategy of meeting minimum housing needs only, without consideration as to whether more should or can be done.
- 2.11 We do not consider the SA has adequately considered whether an additional level of growth can be accommodated, before dismissing the higher growth option. Further, on the basis of the options which could achieve this, how this performs against the relevant SA objectives.
- 2.12 It is our view that there remain additional opportunities for sustainable development in Medway, such as that at Cliffe, which should form part of the package of sites assessed through this additional reasonable alternative. This would be likely, in our view, to perform similarly against the environmental objectives of the SA, whilst performing positively against housing and associated objectives including addressing the regionally important matter of unmet housing needs.