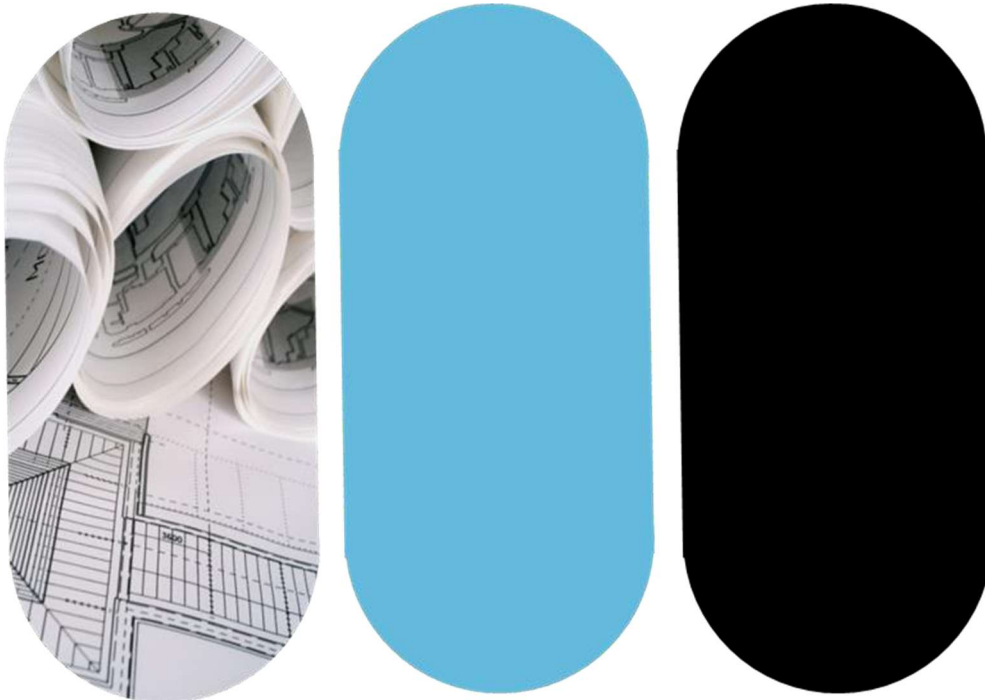




MEDWAY LOCAL PLAN EXAMINATION MATTER 2 HEARING STATEMENT

PREPARED ON BEHALF OF GLEESON LAND

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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Gleeson Land in respect of Matter 2 relating to the Vision, Spatial Development Strategy and Strategic Objectives 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 2: VISION, SPATIAL DEVELOPMENT STRATEGY AND STRATEGIC OBJECTIVES

Spatial Development Strategy

Q.2.4 What are the key factors that informed and shaped the selection of the spatial development strategy of the Plan over other reasonable approaches?

Q.2.5 How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?

- 2.1 The Sustainability Appraisal of the Medway Local Plan (June 2025) provides a useful overview of how the preferred spatial development strategy has been developed with Figure 5.2 setting out a “quick guide” to reasonable alternatives. This has been an iterative process over the course of various Local Plan consultations and associated evidence base documents.
- 2.2 As detailed in Figure 5.2, the broad consideration for “where” growth should be directed were assessed through the Regulation 18 Interim Sustainability Appraisal (June 2024). This was a 2-step process first considering 12no. broad Spatial Delivery Options (SDO) before then identifying more focused options (3no.) through the Spatial Growth Options (SGO)
- 2.3 The various options have been scored against the Sustainability Appraisal objectives as summarised in the impact matrix at Table 5.4 and Table 5.6 of the Reg 19 SA. This shows strengths and weaknesses across all options, which reflects how different approaches will yield different results. Albeit, in the main the SA identifies development would lead to negative effects on environmental objectives and positive effects on housing, economic and employment objectives.
- 2.4 Whilst we consider the methodology is a logical approach, it is unclear how the SA moved from identifying the SDO to the chosen sites for SGO. Para 5.5.3 of the SA 2025 identifies this has drawn on information gathered through Call for Sites exercises and the Interim LAA but does not identify how the Council has chosen which sites are included or not included in each SGO. For instance, Option 2 (Dispersed Growth) includes the site at Land south of Higham Road and east of Buckland Road, Cliffe but this is not included in Option 3 (Blended Strategy).
- 2.5 On balance, the SA concludes the blended strategy is the preferred SGO as it is the best performing option across a number of SA objectives. We agree that of the SGO this is the option which is likely the best option for meeting housing and other needs across Medway.



- 2.6 However, the selection of sites which make up the Blended Strategy SGO may result in some sites being dropped from the preferred option. Again, no reason is given as to how that package of sites has been chosen.
- 2.7 Conversely, the “Comment from the Council” following Table 5.6 of the SA 2025 notes changes between the 2024 and 2025 consultations have led to additional sites from the ‘Dispersed Growth’ option being included in the preferred SGO.
- 2.8 The Spatial Development Strategy within the Plan reflects this Blended Strategy, albeit with a clear focus on brownfield first. The supporting text nevertheless makes clear that brownfield alone will not meet the needs of Medway, in terms of timescales and typology of housing which could be delivered.
- 2.9 We therefore consider the choice of preferred spatial development strategy is sound, however remain concerned there is an insufficient audit trail between the LAA, the SA and how the ‘package’ of sites which form the SGO have been chosen. Notably, this includes Green Belt land which we comment on in more detail in our Matter 5 statement.
- 2.10 We consider there are other suitable opportunities, which formed part of the Dispersed Growth option, which have been discounted from the Blended Strategy SGO without justification, i.e. Land south of Higham Road and east of Buckland Road, Cliffe (LAA Site ID SR6).

Q.2.6 How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

- 2.11 Whilst it is for the Council to justify its chosen strategy and sites selected for allocation, we are concerned the strategy does not reflect national policy requirements, in respect of Green Belt release, and will not meet housing needs in full, especially in the short to medium term. These matters are addressed in full in our Matter 3 and 5 statements but in summary:
- The housing requirement of the Plan is not clear, nor is it considered to be justified;
 - The Plan proposes only a marginal surplus against minimum housing needs, this is likely to result in needs not being met across the Plan period;
 - The Plan currently will not achieve a 5-year housing land supply on adoption;
 - The trajectory of the Plan is unrealistic and would result in a Plan which is not effective;
 - Additional non-strategic sites are needed to increase supply in the first 5-years of the Plan post-adoption;



- In respect of Green Belt release, the Council cannot rely on the Gravesham Local Plan which may or may not be submitted and/or found sound; and
- There remain large areas of Medway outside of the Green Belt within which opportunities for growth remain. These need to be fully considered before Green Belt release could be justified.

2.12 As discussed throughout our representations and hearing statements there remain opportunities for further development in sustainable non-Green Belt locations which can deliver early in the Plan period. Such an example is Land south of Higham Road and east of Buckland Road, Cliffe which we do not consider the Council has considered adequately through its site assessment process, including considering responses submitted by the Promoters at Regulation 18 and 19 stage.

2.13 We remain willing to work with the Council to agree a suitable allocation for the site which could be included as part of modifications to the Plan to address our current soundness concerns.

Strategic Objectives

Q.2.8 How do the strategic objectives support the spatial development strategy and the policies set out in the Plan?

Q.2.9 How does the Plan ensure that the strategic objectives are capable of being delivered within the Plan period?

2.14 We are supportive of the Strategic Objectives of the Plan which set a positive framework for how needs should be achieved across the Plan period. These objectives are unpinned by a mantra of good growth, recognising that meeting needs can be done in a way which delivers a range of benefits to existing and future residents and the environment.

2.15 As set out in our representations and hearing statements we remain concerned the needs of Medway will not be met by the Plan in its current form, especially in the short to medium term.

2.16 Whilst we are supportive of the principle of strategic sites and believe these could result in significant benefits in the medium to long term, any strategy which relies on these needs to be unpinned by a strong supply of non-strategic sites which can deliver early in the Plan period. This enables the Plan to make positive progress against its objectives in the short-term.

2.17 As it stands, we do not consider the Council achieves this. As detailed in our Matter 3 statement, the trajectory of the Plan needs to be re-visited and a realistic evaluation of supply be provided.



2.18 This would, in our view, result in there being a significant shortfall in supply against minimum housing requirements in the first 5-years of the Plan. This shortfall should be addressed through identification and allocation of additional suitable non-strategic sites such as that at Land south of Higham Road and east of Buckland Road, Cliffe.

Q.2.10 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?

Q.2.11 In what way were reasonable alternative development strategies considered and assessed during the plan-making process?

2.19 As detailed above, whilst we consider the choice of preferred spatial development strategy is sound, we are concerned there is an insufficient audit trail between the LAA, the SA and how the 'package' of sites which form the SGO have been chosen.

2.20 We do not consider the Council has fully justified its approach to site selection through the Evidence Base and has not appropriately considered opportunities, such as that at Land south of Higham Road and east of Buckland Road, Cliffe, which could deliver early in the Plan period addressing concerns relating to the trajectory of the Plan.