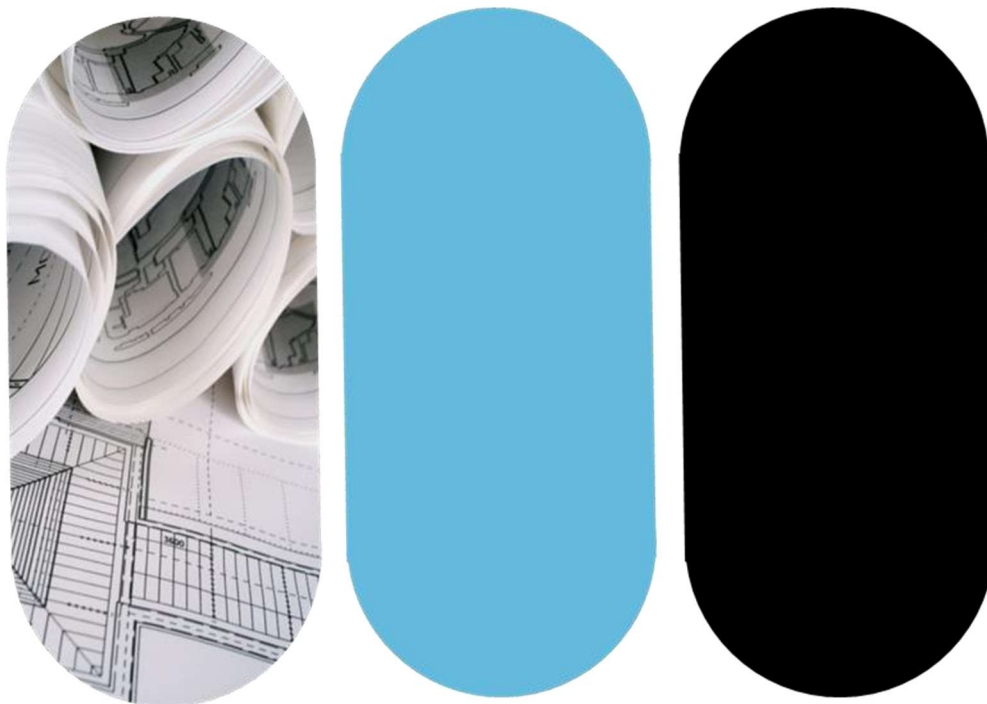




MEDWAY LOCAL PLAN EXAMINATION MATTER 3 HEARING STATEMENT

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 3 relating to housing needs and housing supply 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 3: MEETING HOUSING NEEDS

Housing Requirement

Q.3.1 How has the housing requirement for the Plan period been assessed? What evidence underpins the housing requirement and how has national policy been applied in setting it?

- 2.1 Para 6.1.2. of the Plan sets out the Council's housing requirement is based on the Standard Method calculation for Local Housing Need. As of May 2025 this is calculated at 1,636 homes a year, which equates to 24,540 homes over the Plan period. The Plan notes that strategy is to meet "full housing needs".
- 2.2 It should be noted this calculation provides an assessment of local housing needs, with national policy and guidance is clear this is a minimum figure plans should achieve.
- 2.3 Para 1.3.6 notes the supply provided in the Plan consists of:
- Pipeline sites (with planning consent, not completed or allocated) – 1,762
 - Local Plan allocations – 21,194
 - Windfall sites – 1,584
- 2.4 This results in a total supply of 24,540 dwellings. No buffer is identified, contrary to para 1.3.7 which references a small buffer on supply over need.
- 2.5 As set out in Regulation 19 representations and Matter 1 statement we do not consider the Council has fully justified setting the housing requirement at a level of minimum housing needs.
- 2.6 There are sound reasons for exploring, in accordance with national policy and guidance, a housing requirement set at a level higher than this on the basis of:
- Unmet needs arising from Gravesham – As detailed in our Matter 1 statement, we do not believe the Council has robustly justified the rational for discounting unmet needs from Gravesham in response to a formal request from the Council to accommodate these. We consider it likely there will be unmet needs arising from Gravesham even if the current Local Plan is progressed. A higher housing requirement would help address this regionally important issue.
 - Affordable housing needs – The Local Housing Needs Assessment (LHNA, February 2025) identifies an affordable housing need for Medway of 436 affordable dwellings per annum. This equates to 26.7% of the minimum housing needs figure. The Viability



Assessment (June 2025) is critical about some sites being able to deliver affordable housing i.e. development on previously developed land cannot viably support affordable housing provision. To ensure affordable housing needs are achieved, even at 35% of gross household income, there is clear justification for increasing housing requirements focusing on further viable development i.e. suburban areas and rural areas.

- Infrastructure investment – The Infrastructure Delivery Plan (December 2025) highlights substantial infrastructure requirements across the Plan area, required to support the growth needs of Medway (albeit there still remain gaps in some of the costings). It is not clear whether the level of development proposed can viably support this or if a greater quantum of growth would assist in reducing the per-dwelling cost.

2.7 We consider the housing requirement is not clear. However, based on a housing requirement set at the level of minimum housing needs we consider this approach is not consistent with national policy or positively prepared.

2.8 Further, there is no indication within the Plan as to what the annual housing requirement proposed by the Plan is. On the basis of the above it is assumed this was intended to be set at the minimum level, i.e. 1,636 homes a year, on a flat-trajectory. However, the Housing Delivery Topic Paper (December 2025) published post-Reg 19 consultation indicates a necessity for a stepped trajectory with the requirement starting at 1,636dpa, increasing to 1,963dpa in the middle of the plan-period and reducing to 1,309dpa later in the plan-period.

2.9 We consider there may be justification for a stepped trajectory due to the reliance on strategic sites (with 2/3 of supply from allocations from 12no. strategic sites), but first the Council should have explored other opportunities to increase supply in the early part of the plan period.

2.10 The housing requirement needs further clarity and justification before it can be considered sound.

Q.3.6 There does not appear to be a policy which sets out the housing requirement figure and identifies how the need would be met and distributed. The Council is asked to explain why this is the case?

2.11 We strongly recommend this be added into the plan through modification in order to provide clarity on the housing requirement, including if this steps up and/or down across the plan period, and the expected components of supply.

2.12 This will enable performance against the housing requirement and the Plan to be robustly reviewed and monitored against in the future.



Housing Requirement

Q.3.6 Does the Plan clearly set out the expected, ‘planned-for’ sources of housing supply to meet the identified housing requirement?

2.13 No, there is an absence of information within the Plan itself as to the expected sources of supply including the level of development expected on strategic sites, greenfield sites and brownfield sites. These are important considerations in understand whether the Plan will be successful in meeting needs across the Plan period, including affordable housing.

2.14 This information should be included in the Plan to ensure it is clear and can be effectively monitored against across the Plan period.

Q.3.8 How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?

2.15 As noted above in response to Q.3.1. the Plan identifies no buffer against its overall housing requirement. Conversely, the Housing Delivery Topic Paper identifies at Table 2 a marginal surplus of 150 dwellings across the Plan period (or 0.57% of total supply). Confusingly, however, the components of supply in Table 2 are different from the figures at para 1.3.6 of the Plan. This needs to be clarified as it presents an unclear picture of how the Plan is expected to meet needs.

2.16 In any event, the surplus / buffer is small. There is a clear risk that minimum housing needs (without consideration for anything above this) will not be met over the Plan period.

2.17 Further, whilst the Council identify (at Table 6 of the Housing Delivery Topic Paper) a 5-year supply on adoption, this is only achieved by virtue of removing any ‘buffer’ requirement from the calculation. Planning Guidance is clear (Paragraph: 009 Reference ID: 68-058-20241212) that authorities will need to apply any necessary buffers as set out in the NPPF as part of the Examination of plan policies. Applying the required (in this instance) 20% buffer results in the Council needing to identify a supply of 9,816 dwellings on adoption. There is an anticipated shortfall of 1,284 dwellings against this.

2.18 We also retain our concern that anticipated trajectories for sites have not properly been considered. We include examples of a couple of sites in our Regulation 19 response and note no changes have been made despite the updated Housing Delivery Topic Paper being published. This includes proposed strategic sites, without the benefit of current planning applications, being identified to start in 2027/28.



- 2.19 We continue to support the Council's ambitions to meet housing needs across the Plan period and believe this is best achieved through adoption of a Local Plan, but this Plan needs to be effective, deliverable and realistic. As drafted, we do not consider this to be the case.
- 2.20 The Council needs to provide an updated housing trajectory which reflects realistic lead-in times based on past experience and industry best guidance (i.e. Lichfield's Start to Finish 3). This should provide the basis for understanding likely supply across the short, medium and long-term of the Plan period.
- 2.21 On the basis of the available information, we anticipate this will demonstrate a significant shortfall in supply against minimum housing requirements in the first 5-years of the Plan, thereafter, stepping up as strategic sites start to deliver. This should be remedied through the allocation of additional suitable non-strategic sites which can deliver quickly.
- 2.22 For the reasons set out in our Regulation 19 response and reflective of the current application for the site, we consider Land south of Higham Road and east of Buckland Road, Cliffe is such an opportunity. Whilst allocation of this site alone will not fully address the anticipated shortfall, it will help reduce the gap and reduce the risk of unmet needs being generated by the Plan in its early years.

Q.3.10 How have identified constraints (environmental, highways, utilities, flood risk) been factored into site capacities and delivery timings? If they have not, why?

- 2.23 As set out above, we do not consider the Council has realistically considered likely lead-in times. This is most notable for strategic sites which will result in housing needs not being achieved in the short or medium-term and the vision of the Plan being undermined as a whole.
- 2.24 A review of these delivery timings is necessary in order to ensure the Plan is effective, justified and positively prepared. However this would likely highlight significant shortfalls in housing delivery in the early parts of the Plan period.
- 2.25 This should be rectified by allocation of additional small and medium sites, such as that at Land south of Higham Road and east of Buckland Road, Cliffe, which have the benefit of meeting housing needs in the short-term and enabling the Council's long-term vision to be achieved.
- 2.26 It should be noted that the live planning application at Land south of Higham Road and east of Buckland Road, Cliffe has demonstrated the site is free from environmental, highway, utilities and flood risk constraints.



Q.3.11 What mechanisms does the Plan identify to assess its performance and how it will respond to delivery underperformance (e.g. contingency, review triggers)?

- 2.27 We remain concerned that the Plan has no mechanism to respond to underperformance. This is an important matter as, for the reasons as set out in our Regulation 19 consultation response and matter statements, the Plan as drafted is likely to underperform against housing needs in the short term.
- 2.28 To help address this, the Plan should include a supply buffer, above that of minimum housing needs, which reduces the risk of underperformance. This buffer should include sites which can deliver early in the Plan period.