

## **EXAMINATION OF THE MEDWAY LOCAL PLAN 2041**

---

### **EXAMINATION STATEMENT ON BEHALF OF CATESBY STRATEGIC LAND LIMITED**

*Matter 2 – Vision, Spatial Development Strategy and Strategic Objectives*

*Prepared by:*

*David Neame BSc (Hons) MSc MRTPI  
Director – Neame Sutton Limited*

August 2026

## EXAMINATION STATEMENT ON BEHALF OF CATESBY STRATEGIC LAND LIMITED

*Matter 2 – Vision, Spatial Development Strategy and Strategic Objectives*

*22 August 2026*

---

### 1. Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Strategic Land Limited ("Catesby"), to those Questions raised by the Inspectors (dated 30 July 2026), relating to the Phase 1 Hearings of the Medway Local Plan 2041 ("the Plan") and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton Limited on behalf of Catesby and specifically looks at the questions and issues raised by the Inspectors in relation to Matter 2 – Vision, Spatial Development Strategy and Strategic Objectives.
- 1.3 Catesby has a number of land interests in Medway. This Statement and earlier Representations submitted by Neame Sutton Limited on behalf of Catesby relate to its promotion site on Land at Stoke Road, Allhallows (Refs: AS18 and AS22). It is also relevant to note that there is a live Outline Planning Application on the site (Application Ref: MC/26/0001). A Separate Matter Statement and Representations have been made on behalf of Catesby in relation to its land interest at Land South of Lower Rainham Road (Ref: RN5) by Savills. The points made in this Statement therefore take account of the submissions made by Savills.

## **2. Matter 2 - Questions**

### **The Vision of the Plan**

#### ***2.2 In what ways does the Vision take account of identified local needs, opportunities and constraints?***

- 2.1 In common with the rest of the Plan the Vision says very little about meeting housing needs. A single line stating that housing needs will be met in full without establishing what those needs actually are is not at all reflective of the strategic and national importance of significantly boosting the supply of new homes now. In fact Paragraph 62 of the Framework 2024 is clear that the number of new homes needed should be addressed via strategic policies as a minimum. Therefore a Vision that simply seeks to meet the minimum (as is the case in Medway) does not actually go far enough to address this fundamentally important Government objective.

### **Spatial Development Strategy**

#### ***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?***

- 2.2 For the reasons we have articulated in our Matter 1 Statement and Regulation 19 Representations the failings in the Council's SA process has resulted in a position that the reasons for the chosen spatial development strategy are unclear.
- 2.3 It is certainly the case that there are other reasonable approaches that would yield a better outcome particularly in terms of meeting housing needs that the Council has discounted without sound justification for doing so.
- 2.4 In this respect the Council has ignored key factors such as the unmet need arising from neighbouring authorities in shaping the selection of its spatial development strategy.

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

- 2.5 In short the Plan does not set out reasons or a justification for the selection of the preferred spatial development strategy. This job is largely left to the evidence base in the form of the SA, but that too is deficient in the way that it deals with reasonable alternatives to the growth option chosen and the spatial delivery strategy.
- 2.6 In fact Section 3 of the Plan simply describes the strategy and does not attempt to justify it.

**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?**

- 2.7 Whilst the key constraints have been identified by the Council and avoided by the spatial development strategy that has been progressed the opportunities have not been treated similarly. In fact it is evident from the Key Diagram on Page 23 of the Plan that there are large areas of land on the Hoo Peninsula that are relatively unconstrained and present an opportunity to strengthen the existing communities in that area.
- 2.8 This key opportunity was considered at the Regulation 18 consultation stage by the Council and potential viable site options identified, but since that time the northern extent of the Hoo Peninsula has been largely ignored.
- 2.9 In fact this Plan seeks to provide nothing for settlements like Allhallows over the entire 15 year Plan period. No housing, no employment, no community infrastructure and no green infrastructure.
- 2.10 These communities are effectively abandoned by the Plan for the next 15 years and sites previously considered suitable by the Council that could make a meaningful contribution towards the future vitality and viability of these communities have been ignored.

**Strategic Objectives**

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

- 2.11 On the matter of housing need and delivery the strategic objectives once again contain little detail. The first objective under the heading 'supporting people to lead healthy lives and strengthening our communities' contains reference to the provision of homes to meet demand.

- 2.12 For the reasons we have identified in Matters 1 and 3 the Council has not in fact planned to meet demand and the spatial development strategy leaves many communities, such as Allhallows, without any development to meet their needs at all.

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

- 2.13 This question relates directly to one of the core failures of the Plan as submitted. The Plan contains no strategic policies to ensure the spatial development strategy is delivered, nor does it set a minimum housing requirement and identify how and where that requirement will be delivered together with the supply sources that are to be relied upon.
- 2.14 In this respect the Plan fails to ensure that the strategic objective of delivering new homes to meet demand can and will be met within the Plan period.

**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.**

- 2.15 This question is primarily for the Council to provide an answer to.
- 2.16 We do however note that the evidence base, particularly the SA, does not support the spatial distribution the Council has identified. There is a clear need for further housing development to meet needs and there are sustainable opportunities that the Council has previously considered acceptable that have not been taken forward and should have been.
- 2.17 In Catesby's view the spatial distribution proposed is not the most sustainable, deliverable and appropriate approach to the delivery of new development during the Plan period.
- 2.18 Of particular note is the fact that the brownfield urban regeneration development proposed within the Plan is focussed on Chatham and Strood and comprises largely flatted development<sup>1</sup>, which the Council accepts will not meet the needs of all residents.

---

<sup>1</sup> Paragraphs 3.1.3 – 3.1.4 on Page 21 of the Plan refer.

- 2.19 This is of particular concern given that the Council's Local Housing Needs Assessment (February 2025) identifies the potential for up to 844 dpa of affordable housing need<sup>2</sup>. That is over 50% of the minimum LHN identified for the Plan, which is massive.
- 2.20 Using the affordable housing need as an example the Plan is seeking to deliver a substantial proportion of its housing requirement on sites that it confirms will be unable to meet needs, particularly in relation to affordable homes and family homes. This approach will fail to meet needs particularly those who are most vulnerable and in need of a home.
- 2.21 The solution is a simple one, to allocate more sites that are able to deliver affordable homes and family homes to meet needs across the District. This is dealt with in more detail in our Matter 3 Statement.
- 2.22 We will also return to this matter in more detail at the Examination Hearing and in the light of the Council's answer to this question.

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

- 2.23 As we have explained in our Matter 1 Statement the Council has not considered any reasonable alternative development strategies during the plan-making process. The 'blended' approach has remained a constant with only consideration being given to alternative growth scenarios and individual site options. This is a significant failing of the plan-making process that has meant the Council cannot say with certainty that its spatial development strategy is the most suitable and sustainable one and that it could not accommodate a higher level of development, for example, to help meet unmet needs arising from its neighbours.
- 2.24 The SA that accompanies the submission version of the Plan [Ref: A3.2] refers to the Interim SA that accompanied the Regulation 18 consultation and suggests that 12 spatial delivery options were tested<sup>3</sup>.
- 2.25 It is however clear from the assessment undertaken at the Regulation 18 consultation stage<sup>4</sup> and then summarised in the Regulation 19 SA (Section 5) that the 12 spatial delivery options were in fact components of a single blended strategy and not delivery options in their own right.

<sup>2</sup> See Paragraph 6.20 and Table 6.4 on Page 78 of Local Housing Needs Assessment – Final Report – February 2025 [Document Ref: B10]

<sup>3</sup> Paragraph 5.4.1 on Page 27 and Table 5.3 on Page 28 of SA [Ref: A3.2]

<sup>4</sup> See Appendix B of Regulation 18 Interim SA [Ref: C2.4.2]

- 2.26 A key demonstration of this is that none of the spatial delivery options identified would be capable of accommodating the development needs of the Borough over the Plan period. Each spatial delivery option would therefore need to be blended with a number of other options to meet the development needs identified. Paragraph 5.4.5 of the Regulation 19 SA confirms this fact in terms.
- 2.27 As a consequence of the approach the Council has taken the SA does not consider reasonable alternative development strategies, it merely assesses the 12 individual components against the SA criteria on an isolated basis and then a choice is made as to how to blend them together into a spatial delivery option. That does not amount to an assessment of reasonable alternative development strategies as required by the PPG<sup>5</sup>.
- 2.28 By not considering alternative development strategies the Council has artificially constrained its assessment of the most appropriate strategy for the Plan and has rejected site options that would otherwise be capable of delivering its strategic objectives and vision for the Plan period.

***2.12 How does the spatial development strategy address the requirements of different parts of Medway such as the Hoo Peninsula as well as the more urban areas?***

- 2.29 In short terms the spatial development strategy does not address the requirements of different parts of Medway.
- 2.30 In specific relation to housing development the urban areas, Chatham and Strood, are expected to accommodate predominantly flatted development that will not meet the needs of families and will also fail those more vulnerable members of the community in need of a mix of affordable homes.
- 2.31 By contrast the Hoo Peninsula is expected to rely on the development allocations around Hoo St Werburgh with the remainder of the peninsula being effectively abandoned for the whole Plan period.
- 2.32 This approach does not meet the needs of different parts of Medway and will leave both the urban and rural areas deficient in terms of meeting the housing, employment and infrastructure needs of the community in a mixed and balanced way.

---

<sup>5</sup> See Strategic Environmental Assessment and Sustainability Appraisal section of PPG

- 2.33 There are other consequences of the approach taken by the Council, which include the further exacerbation of current travel patterns as people are forced to live in locations away from where they may be working. There is also likely to be a further disadvantage to those members of the community needing affordable homes that can only be accommodated where those homes are built and not necessarily where they may wish to be living close to family, friends and, work opportunities.
- 2.34 The Hoo Peninsula in particular contains a number of settlements that desperately need infrastructure investment and housing to sustain them over the Plan period, which are being completely overlooked.
- 2.35 The Council is clearly keen to improve the sustainability of the Hoo Peninsula as a location for growth as expressed in Section 9.4 and Policy DM17 of the Plan. Further development including new homes would be an ideal way to enable the improvement of the sustainability of the location in accordance with the Council's aspirations. The current development strategy simply seeks to bolt onto Hoo St Werburgh without taking the other opportunities presented across the peninsula. That is a missed opportunity.

**Total number of words: 2140**

---