

EXAMINATION OF THE MEDWAY LOCAL PLAN 2041

EXAMINATION STATEMENT ON BEHALF OF CATESBY STRATEGIC LAND LIMITED

Matter 3 – Meeting Housing Needs

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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 3 – Meeting Housing Needs.
- 1.3 The answers provided in this Statement should be read alongside our Regulation 19 Representations submitted in July 2025 and our Representations to the second Regulation 19 consultation in July 2026 including the Housing Need and Supply Technical Report Update dated 03 July 2026.
- 1.4 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 3 - Questions

Housing Requirement

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 The national policy requirement for calculating the minimum housing requirement insofar as it relates to this Plan is set out in the Framework 2024 and accompanying PPG.
- 2.2 The starting point for the calculation of the Local Housing Need ("LHN") is the Standard Method 2025. For Medway the LHN as at May 2025 equates to 1,636 dpa¹.
- 2.3 The Council's position in the Plan appears to be that over a 15 year period the minimum LHN equates to 24,540 dwellings². However, the Topic Paper seeks to update this position to extend the Plan period to 16 years 2025 – 2041, which results in a LHN of 26,176 dwellings³.
- 2.4 The starting point must therefore be 26,176 dwellings. However, it may be necessary to extend the Plan period to 2042 in order to ensure a 15 year period as a minimum at the point of adoption, which will now be in 2027 at the earliest. That would increase the LHN by a further 1,636 dwellings leading to a minimum total LHN of **27,812 dwellings**.
- 2.5 In our Technical Report Update we set out the fact that there is a clear case for an uplift to the minimum LHN in Medway. The Council has not sought to explore the case for an uplift at all in its evidence base.
- 2.6 Furthermore, the Council has identified unmet need arising from Gravesham of at least 2,000 dwellings, which it has included in one of the growth options considered through the SA process. As we have explained in our Matter 1 Statement the DtC process in Medway is incomplete and it is therefore likely that further unmet need will exist. Swale and Tonbridge and Malling are two key examples⁴.

¹ Paragraph 3.1.3 on Page 6 of the Housing Delivery Topic Paper December 2025 confirms this is the Council's position [Ref: D22.5]

² Paragraph 1.3.5 on Page 13 of the Plan (Ref: A1)

³ The Council notes that this change would need to form a Main Modification to the Plan

⁴ See Section 2 of the Technical Report Update.

2.7 It is our view therefore that there is a strong case for an uplift to the minimum LHN to accommodate a proportion of unmet need arising from neighbouring authorities and to address other factors such as the infrastructure delivery requirements in Medway.

2.8 The Minimum Housing Requirement for the Plan period should therefore comprise:

Table 1: Catesby's Position on the Minimum Housing Requirement

Components of Need (2025 – 2042)*	Dwellings	Dpa
Local Housing Need (LHN)	27,812	1,636
Minimum Adjustment for Unmet Need and other factors such as infrastructure delivery	4,000	250
TOTAL Minimum Housing Requirement (2025-2042)	31,812	1,871

*based on the necessary extension to the Plan period to 2042 to enable at least 15 years from the expected date of adoption in 2027

3.2 How does the Plan demonstrate that the housing requirement is realistic and deliverable in light of the constraints identified in the evidence base?

2.9 This is primarily a question for the Council to answer, which we may respond to at the Hearing session.

2.10 The Plan does not contain any policies that deal with the minimum housing requirement nor does it have any policies (save for the site allocations) that deal with the supply and distribution of housing. The only references in the Plan to the housing requirement are set out in Section 1 where the requirement is not expressed as a minimum.

2.11 Furthermore, Paragraphs 1.3.5 and 1.3.6 confirm a need for 24,540 dwellings and a supply for exactly the same number of dwellings comprising:

Table 2: Council's Requirement and Supply as set out in Section 1 of the Plan

Housing Requirement	
15 years 2026-2041	24,540
Housing Supply	
Pipeline Sites (commitments and extant allocations)	1,762
Local Plan allocations	21,194
Windfalls	1,584
TOTAL Supply 2026-2041	24,540

2.12 So the Plan only seeks to meet the LHN exactly.

- 2.13 The allocations made by the Council do all appear to be developable as a matter of principle. We have dealt with the deliverability of various allocations in the Technical Report Update.

3.3 The Council states a housing requirement of 1,636 dwellings per annum to 2041 (circa. 24,540 homes). Is this the Plan's minimum requirement? How it has been set and explain how flexibility and contingency in its delivery is provided.

- 2.14 This is also a question for the Council to answer given the lack of information and evidence within the Plan itself.
- 2.15 However, for the reasons we have given in our answer to Question 3.1 above and also the detail set out in the Technical Report Update the minimum requirement must be higher than 24,540 dwellings in order to cater for the minimum 15 years post adoption and the other factors of unmet need and infrastructure delivery we have identified.
- 2.16 In terms of flexibility and contingency is concerned the Plan contains none. The development strategy set out by the Council is reliant upon 100% delivery from all sources identified including windfalls over the Plan period just to meet the minimum need identified. That is not a sound strategy and is set up to fail.

3.4 Please could the Council clarify and confirm the Plan's housing requirement figure for the adoption of the Plan, provide an explanation of how this is identified and the buffer applied to manage non-delivery risk.

- 2.17 As we have explained above there will be a need to extend the Plan period by at least 1 year to 2042 to ensure a minimum 15 year period from the year of adoption in 2027. That will have a material impact on the housing requirement figure for the Plan whether our figures or the Council's are used.
- 2.18 No allowance is made for any kind of buffer to manage non-delivery risk.
- 2.19 As we have confirmed in Table 3 of the Technical Report Update the Housing Delivery Test ("HDT") results for Medway are poor. Since that report was prepared the Government has published the latest HDT result on 16 August 2026. An update to Table 3 is therefore set out below:

Table 3: Update to the HDT Results for Medway

HDT Year	HDT Result
2019	46%
2020	55%
2021	67%
2022	79%
2023	72%
2025	60%

- 2.20 The latest result for 2025 shows a material worsening of the Council's position and triggers the automatic presumption set out in Policy S5.1j of the Framework 2026.
- 2.21 The Council should, as a minimum, therefore include **a buffer of 20%** to manage the non-delivery risk in the Borough.

3.5 The development proposed in the Plan is identified as meeting the full Local Housing Need and this is identified as the housing requirement figure. However, 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.

- 2.22 This is for the Council to answer. However, it is clear from the Framework 2024⁵ and accompanying PPG that the Plan should contain a policy setting out what the housing requirement figure is and how that need will be met along with the spatial distribution of development.

Housing Supply

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

- 2.23 In short, no the Plan does not do this.
- 2.24 Paragraph 1.3.6 of the Plan sets out headline figures and identifies proposed allocations and windfalls.
- 2.25 The individual site allocations are set out in Section 14 of the Plan but there is no headline table setting out the contribution each site makes to the total identified in Paragraph 1.3.6.

⁵ Paragraphs 20, 21, 22, 62, 72, 75 and, 78 of the Framework 2024 in particular

2.26 As far as windfalls are concerned, the Plan is silent. No explanation is provided at all and the Council does not even mention the requirements of Paragraph 75 of the Framework 2024.

2.27 This is a significant failure in terms of the soundness of the Plan.

3.7 With regard to meeting housing need through an identified supply of land, particularly over the first five years of the Plan period, we note that the proposed housing trajectory appears to be outside of the Plan and is, in fact, within a separate Topic Paper (ref: B22.5). Why is this?

2.28 This is primarily a question for the Council to answer.

2.29 The Framework 2024 is clear on its expectations:

*'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.'*⁶

2.30 The Plan currently contains neither a strategic policy nor a housing delivery trajectory. These points need to be addressed and modifications proposed for the Plan to comprise a sound housing delivery strategy in accordance with the requirements of the Framework 2024.

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

2.31 The Plan does not do this. The only evidence presented by the Council, as noted by the Inspectors, is contained in the Topic Paper⁷.

2.32 We have examined the housing trajectory that is included in the Council's Topic Paper in our Technical Report Update⁸.

⁶ Paragraph 78 of the Framework 2024

⁷ Ref: B22.5

⁸ See Section 3 and Appendices 1-4 of our Technical Report Update – July 2026

- 2.33 From that analysis it is clear that the Council has not demonstrated deliverability across the Plan period. In some instances the Land Availability Assessment⁹ (“LAA”) does not contain any delivery evidence¹⁰. In particular our analysis raises concerns in relation to the following sites and their total delivery over the Plan period:

Table 4: Sites Where Deliverability has not been Demonstrated by Council for the Total Number of Dwellings Expected over the Plan Period

Site Address	Council Delivery	Neame Sutton Delivery	Difference
Land at Main Road and Church Farm (Ref: HHH12)	1800	1286	-514
Land East and West of Ropers Lane (Ref: HHH22 & HHH31)	1800	620	-1180
Land East of High Halstow (Ref: HHH26)	760	750	-10
Land West of Capstead Road and East of Shawstead Road (Ref: LW8)	2000	1400	-600
Land North of Brompton Farm Road (Ref: SNF8)	800	500	-300
TOTAL	7160	4556	-2604

- 2.34 In addition to the above we have also highlighted a number of sites where the Council's expectations of delivery timetable are unsupported by evidence, which in turn has an impact on its ability to demonstrate a rolling 5-year housing land supply. These sites are highlighted in Table B to Appendix 1 of the Technical Report Update.

3.9 How does the Plan demonstrate the role of small sites/SMEs in housing supply and the robustness of any windfall assumptions?

Small Sites/SMEs

- 2.35 In short terms the Plan would appear to be silent on the role of small sites/SMEs.
- 2.36 This is in direct conflict with the requirements of the Framework 2024 that confirms small and medium sized sites can make an important contribution to meeting the housing requirement of the area. In particular, the Framework 2024 requires the identification through the Plan of land to accommodate at least 10% of the minimum housing requirement¹¹. This has not been done.

⁹ Ref: B1

¹⁰ See Appendix 1 Table B of our Technical Report Update – July 2026

¹¹ Paragraph 73 a) of the Framework 2024

Windfalls

- 2.37 Paragraph 75 of the Framework 2024 is clear that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be **compelling evidence** that they will provide a reliable source of supply. The paragraph goes onto confirm that regard should be had to both history windfall delivery rates and **expected future trends**.
- 2.38 As we have set out in our Technical Report Update¹² the Council has only completed half of the necessary assessment for the compelling evidence test to be met. No consideration is given to expected future trends or circumstances such as the 9 points set out at 3.21 of our Technical Report Update.
- 2.39 The Windfall allowance relied upon by the Council does not therefore meet the Paragraph 75 test and should be reduced to remove any allowance within the first 5-years of the Plan period (post adoption) with a further discount similar to that applied by the Council to its small sites. The resulting, realistic level of windfall provision that meets the Paragraph 75 test is set out in Table 5 of our Technical Report Update.

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

- 2.40 The LAA does contain some information on constraints for each of the sites, but it is unclear if or how these constraints have been taken into account when identifying site capacities and delivery estimates. What is clear is that the Council does not have robust evidence to support its delivery expectations from a number of sites (as we have already identified) and therefore it is likely that the impact of constraints, or indeed the potential for mitigating those constraints, has not been properly factored into the Council's trajectory.
- 2.41 We will respond further to this question at the Hearing session and once the Council has produced its Matter Statement answering these points.

¹² See Paragraphs 3.18 – 3.24 and Table 5

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)?

- 2.42 As currently drafted the Plan contains no policy dealing with the monitoring and review of its performance over the Plan period. As a consequence the Council has given no consideration to the need for contingency or review triggers in the event that its spatial development strategy does not perform.
- 2.43 This is a high risk strategy at the best of times but in circumstances where the Council is seeking merely to meet its minimum LHN without any buffer, the approach taken by the Council cannot possibly be considered to be positively prepared or justified.
- 2.44 A monitoring framework should be in place that links into the necessary annual Housing Delivery Action Plans that the Council are required to produce¹³. The framework should include a contingency mechanism to enable the delivery of housing to continue on suitable sites in circumstances where the Council's planned delivery underperforms. Linked to this is the need to include a buffer of at least 20% for non-delivery.
- 2.45 These matters must be addressed in order to create a sound housing delivery strategy within the Plan.

Total number of words: 2641

¹³ Given the consistently poor HDT results