

**HEARING STATEMENT
MATTER 2: VISION, SPATIAL DEVELOPMENT STRATEGY AND STRATEGIC OBJECTIVES**

HALLAM LAND (ID: E157, E.20)

(Q2.1) How does the Vision for the Plan express the long-term ambitions for Medway up to 2041?; and

(Q2.2) In what ways does the Vision take account of identified local needs, opportunities and constraints?

- 1.1 We take Q2.1 and Q2.2 together reflecting our concerns about the derivation and wording of the Vision.
- 1.2 While we are supportive of the vision in principle, our Regulation 19 representations (C1.2, E.157) highlight a fundamental flaw which is still yet to be rectified: the definition of the plan period and the consequential changes needed to plan effectively for that entire period. This same matter has been raised by the Inspectors (MLP/ED5, Q8) prompting the Council's initial response (MLP/ED6).
- 1.3 It is common ground that adoption is unlikely to be in 2026 (MLP/ED6, response to Q8). The defined period to 2041 therefore only provides a 14-year plan period (instead of the "15-year period from adoption" required by the NPPF¹). The Council acknowledges this inconsistency with national policy but instead of aligning with national policy, have suggested that the matter is overlooked because *"a number of large strategic sites, such as Hoo St Werburgh, and Medway City Estate provide land for development outside of the plan period [and] the housing trajectory identifies over 2,500 homes to be delivered post 2041, which will contribute to land supply for 15 years on adoption of the plan"*. Notwithstanding that many of those sites are subject to significant deliverability constraints as highlighted in our Regulation 19 representations (and which fall to be considered under other Matters), this is not a positive approach to planning and does not accord with national policy.
- 1.4 To accord with national policy, the plan period should extend to 2041/42 at the earliest. Failure to address this has the consequence of suppressing the real housing need against which the Local Plan is to be tested. This is evident in Table 2 of the Housing Delivery Topic Paper (B22.5) which calculates a housing requirement of 26,176 homes based on an incorrect plan period of 2026/27 – 2040/41. The nominal surplus of 150 homes is consequently eroded when the plan period is defined correctly to look to 2042 (27,812 homes).
- 1.5 For that reason, the vision does not address the long-term ambitions of the Local Plan or indeed the identified local needs in full. This discrepancy should be rectified to ensure that the emerging Plan is consistent with national policy. Given the limited flexibility allowed for

¹ Paragraph 22 of the NPPF (December 2024), under which the Plan is being Examined

in the housing supply, it is also critical for the Council to explore additional sites to bolster supply and delivery to meet housing needs in the Plan area during the plan period.

(Q2.4) What are the key factors that informed and shaped the selection of the spatial development strategy of the Plan over other reasonable approaches; and

(Q2.10) 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?

- 1.6 Whilst noting that Question 2.10 is directed to the Council, our response to Q2.4 is pertinent to that consideration.
- 1.7 The NPPF at paragraphs 32 and 33 set out the evidence that should underpin plan-making. This includes sustainability appraisal, and relevant and up-to-date evidence.
- 1.8 The overall distribution of development supports regeneration efforts within the urban area. Our Regulation 19 representations (C1.2, E.157) set out that we are supportive in-principle of the Council's brownfield-first approach. This commendable approach aligns positively with national policy. Our representations, however, also raised significant concerns that the Council's application of this approach is not the most sustainable or deliverable based on the evidence.
- 1.9 With respect to sustainability, we refer to our response to Matter 1, where we raise concerns over the Council's apparent disregard of its own evidence base when selecting site allocations. We also refer to our response to Matter 1 for additional commentary on the impact of the EA's Regulation 22 representations.
- 1.10 In relation to deliverability, the selected spatial distribution concentrates growth on constrained, poorly-performing, and less viable sites as assessed by the Council's own Sustainability Appraisal (A3.1–A3.3); the Environment Agency's Regulation 22 representations (MLP/ED16A, E.15); and the viability evidence (B5) and supporting Infrastructure Delivery Plan (B2)². It is therefore unclear how the evidence has informed the Council's decisions.

(Q2.6) How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

- 1.11 The SDS is significantly flawed in its response to key constraints and opportunities. Less constrained, better-performing sites have been rejected in favour of sites which perform less well. The Environment Agency's sustained objection demonstrates one instance of this, with

² We note that site-specific allocations fall to be considered in Phase 2 of the Examination and therefore do not raise detailed site matters under the Phase 1 Examination Matters).

unresolved HRA matters demonstrating another instance (per Matter 1). These are strategic considerations that should direct spatial decision-making.

- 1.12 The SDS also disregards a significant opportunity for cross-boundary collaboration with Tonbridge and Malling Borough Council (TMBC) where adjoining land at Holborough Quarry is subject to a draft allocation in the emerging Tonbridge and Malling Local Plan and was found to be grey belt in that authority's Green Belt Review (Regulation 18, November 2025). However, there is no Statement of Common Ground with TMBC. This approach does not demonstrate positive planning and is also inconsistent with the approach taken with Gravesham Borough Council (GBC).

(Q2.8) How do the strategic objectives support the spatial development strategy and the policies set out in the Plan?

- 1.13 For the reasons set out in our representations to Matter 1 (Question 1.13), we do not consider that the strategic objectives are translated into the spatial development strategy. The strategy contains no policy setting out the housing requirement, meaning that it is not demonstrated how the strategic objectives will be delivered.

(Q2.9) How does the Plan ensure that the strategic objectives are capable of being delivered within the Plan period?

- 1.14 As set out in our Regulation 22 representations (MLP/ED16A, E.20, Infrastructure and Housing Delivery), the strategy depends on sites reliant on uncosted, untested or undeliverable mitigation. There also remains the sustained objection from the EA (MLP/ED16A, E.15). These matters raise uncertainty regarding the principle of development (e.g. should the HRA not reach a position of no adverse effect, or should the EA not lift its objection) for some of the Council's most important strategic allocations.
- 1.15 Secondly, there are significant concerns over the timing of delivery. The largest allocations require substantial lead-in periods, not only to allow for the above matters to be resolved, but also secure strategic infrastructure and unlock complexities attached to multiple landownership. The Council's housing trajectory does not appear to take this into account, for example unrealistically suggesting that both the Hoo St Werburgh and Chattenden (Policy SA8) and Capstone Valley (Policy SA7) allocations can deliver first completions within the first year of the Local Plan, despite significant unresolved environmental and transport constraints. We urge the Inspectors to consider our Regulation 22 representations (MLP/ED16A, E.20, Infrastructure and Housing Delivery), where we set out more realistic supply assumptions for the plan period.
- 1.16 In terms of viability, we acknowledge the letter issued by Matthew Pennycook MP on 15 July 2026 and anticipate that the Inspectors and Council will reflect upon the letter during the Examination. The letter largely focuses on market volatility, which is a cyclical matter affecting all proposals and Plans, and encourages Inspectors to distinguish between market conditions and "*evidence indicating a fundamental obstacle to delivery*". Our primary concern is that the Plan contains fundamental obstacles in that there are unresolved, uncosted and

unfunded mitigation measures which are yet to be captured in the IDP and not fully reflected in the Council's viability evidence. It is therefore unclear at present whether the allocations are viable irrespective of market conditions. Our view is that any discretion can only be applied once full costs have been understood, which we contend has not yet been demonstrated.

- 1.17 The implication is that the Council heavily relies on sites that may struggle to come forward, or where they do, may only come forward much later than anticipated in the housing trajectory (B22.5). This leads to considerable uncertainty that the strategic objectives can be met, notwithstanding that the defined Plan period is too short (per our response to Q2.2).

(Q2.11) In what way were reasonable alternative development strategies considered and assessed during the plan-making process?

- 1.18 Reasonable alternative development strategies have not been consistently and adequately considered or assessed. The Sustainability Appraisal (A3.1–A3.3) only tested three options (urban, dispersed and the preferred blend), and did not adequately explore a cross-boundary growth approach.
- 1.19 In relation to potential cross-boundary development aligned with Tonbridge and Malling Council's emerging Plan, the Council rejected the land at Holborough Quarry (site CH4, per site selection analysis at appendix J to the SA (A3.3)) but did not consider this as a Spatial Delivery Option, despite considering other strategic sites as alternatives (see for example Figure 5.3 of A3.2 which identifies other preferred strategic sites on an individual basis, but the cross-boundary opportunity at Holborough Quarry as part of a larger tract of land).

(Q2.12) 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?

- 1.20 The strategy does not address the requirements of all parts of Medway.
- 1.21 The Medway Valley is a largely unconstrained and sustainable location benefiting from existing physical and social infrastructure. However, the Council disregards this location without further assessment, including in relation to a spurious objection based on the Lower Thames Crossing (which we discuss further under Matter 5 (Q5.13)).
- 1.22 A highly sustainable part of Medway has therefore not been considered in the strategy. This is a fundamental flaw that does not demonstrate positive planning. In the context of the contingency required to make the Plan robust, this omission must be addressed.