

Medway Local Plan – Examination in Public

Hearing Statement: Matter 7 - Economic Development

August 2026

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Document History

Issue	Date	Issued by	Comment
1.0	25/08/26	AW	Draft for client review
2.0	26/08/26	AW	Final issue

1. Introduction

- 1.1 This Hearing Statement has been prepared by Savills on behalf of the Church Commissioners for England (the Commissioners) in response to Matter 7 of the Inspectors' Matters, Issues and Questions for the examination of the Medway Local Plan 2041 (the Plan).
- 1.2 Land West of Ropers Lane (HHH22), Land East of Ropers Lane (HHH31) and the Kingsnorth Expansion Area (HHH35) are owned by the Commissioners. HHH35 is allocated by Policy SA14 for 157,000 sq m of E(g)(iii), B2, B8 and employment-related sui generis floorspace.
- 1.3 The Commissioners' membership of the Hoo Consortium enables it to rely, where relevant, on the Consortium's representations concerning the shared vision for growth at Hoo St Werburgh. This Statement is, however, confined to the Commissioners' particular interest in the allocation, deliverability and phasing of HHH35.

2. Response to the Inspectors' Questions

MIQ Q7.4

Chapter 7 of the Plan sets out an employment strategy (protect, modernise, allocate new) supported by needs evidence (the Employment Land Need Assessment – ELNA). How does the Council demonstrate that the scale, type, location and phasing of employment land proposed matches market demand, infrastructure constraints and requirements and the future economic needs of Medway?

- 2.1 The Council's aim of achieving a balanced distribution of employment land across Medway and making effective use of previously developed land is recognised and supported by the Commissioners. It does not challenge the overall quantum or range of uses allocated at HHH35. Its concern is confined to the requirement that HHH35 should be withheld until employment sites on previously developed land have been occupied.
- 2.2 B12 (Employment Land Needs Assessment) identifies a minimum industrial requirement of approximately 204,000 sq m and an identified supply of approximately 883,812 sq m. It therefore concludes at paragraph 7.15 that there is no need to increase the industrial supply on purely quantitative grounds. HHH35 does not appear within the quantified supply in Table 7.3. However, the assessment does not conclude that further employment growth is unnecessary or that all employment sites perform an equivalent function. Paragraph 7.2 identifies a strong rationale for over-provision to support job growth, address outward commuting and improve wages. Paragraph 8.14 records a shortage of built stock and recommends that, where economic floorspace would assist placemaking within major housing schemes, the Council should consider additional local-scale and quality employment provision.
- 2.3 The submitted Plan has subsequently chosen to allocate HHH35 because it performs a distinct spatial and economic role. Paragraph 14.15.6 of A1 (Submission Medway Local Plan 2041) states that HHH35 will adjoin planned housing east of Ropers Lane, will help to ensure that Hoo St Werburgh is a sustainable location for large-scale growth and should play an important role in the managed release and relocation of businesses from Medway City Estate.
- 2.4 That rationale is consistent with paragraph 8.14 of B12 (Employment Land Needs Assessment), which recognises that employment provision associated with major housing development can assist placemaking, and paragraph 8.15, which identifies a strong case for over-providing economic land where other policies support its continued promotion. HHH35 is therefore not advanced simply as a numerical addition to the Medway-wide supply: it provides market choice, supports the planned balance of homes and jobs at Hoo and has a potential relocation function which other sites may not perform.
- 2.5 Paragraph 14.15.7 of A1 (Submission Medway Local Plan 2041) acknowledges that greenfield employment land at Kingsnorth is likely to be commercially attractive. The Council's concern that the early development of a commercially attractive greenfield site could affect the delivery of sites on previously developed land is recognised by the Commissioners. However, commercial attractiveness also supports the deliverability of HHH35, and the general advantages of a "brownfield first" approach do not, of themselves, establish that HHH35 must remain unavailable until other employment sites have been occupied.
- 2.6 The Council may appropriately monitor the relative progress of brownfield and greenfield employment sites; that principle is accepted by the Commissioners. However, that monitoring should

not operate as a precondition preventing HHH35 from coming forward until other employment sites have been occupied. Such a dependency is not justified by the evidence and could prevent HHH35 from responding to market demand for reasons outside the Commissioners' control. Criterion 4 of Policy SA14 should be modified to remove the prior-occupation dependency and allow HHH35 to come forward in response to market demand, subject to the timely provision of the necessary infrastructure. Without that modification, the proposed phasing of HHH35 is not justified or effective.

MIQ Q7.20

What evidence demonstrates that the proposed employment allocations are deliverable, including landowner support, market demand, infrastructure provision and the absence of significant constraints?

- 2.7 Landowner support for HHH35 is unequivocal. The site is in the Commissioners' sole ownership, is available for development and is being actively promoted for the employment uses identified in Policy SA14. The site has also attracted market interest in relation to potential employment development. Its availability, single ownership and market interest provide a clear basis for coordinated masterplanning and delivery.
- 2.8 The site adjoins the established employment cluster at Kingsnorth and the planned strategic housing growth at Hoo. The range of uses identified in Policy SA14, including sui generis uses of an employment nature, provides flexibility to respond to differing occupier requirements. The Council's acknowledgement at paragraph 14.15.7 of A1 (Submission Medway Local Plan 2041) that the land is likely to be commercially attractive also provides support for its market deliverability.
- 2.9 The need for any proposal for HHH35 to address access, highway capacity, utilities, environmental effects and other relevant matters through the masterplanning and planning application process is recognised. These are proper site-specific considerations, but they do not provide a reason for making HHH35 dependent upon the occupation of other employment sites. Its timing should instead be guided by market demand and the timely provision of the infrastructure necessary to support its development.
- 2.10 HHH35 is therefore capable in principle of coming forward earlier in the plan period where market demand exists and the necessary infrastructure can be provided. Its actual delivery should be governed by those relevant considerations, rather than by the performance and occupation of other employment allocations which are outside the Commissioners' control.

MIQ Q7.22

If one or more strategic employment allocations fail to come forward as anticipated, what flexibility exists within the Plan to ensure that economic growth objectives can still be achieved?

- 2.11 Policy SA14 does not presently provide adequate flexibility in relation to HHH35. Criterion 4 states that the site is 'anticipated' to be developed during the latter part of the plan period, 'i.e. after employment sites on previously developed land have been occupied'. The first phrase could be read as an indicative trajectory, whereas the second is capable of being applied as a policy precondition. The intended effect is therefore unclear.
- 2.12 If prior occupation is intended to be a precondition, the policy does not identify which previously developed sites must be occupied, the level of occupation required, the date by which progress will be reviewed or the circumstances in which HHH35 may be released. Its timing would consequently depend upon the actions and commercial decisions of unrelated third-party landowners.
- 2.13 This arrangement may also limit the Plan's ability to respond flexibly if one or more brownfield allocations is delayed or remains unoccupied, because the stated trigger for HHH35 may then not be satisfied. HHH35 could consequently be unable to respond to market demand even where the

necessary infrastructure could be provided. A clearer release mechanism would therefore strengthen the Plan's ability to deliver the economic growth objectives of Policy SA14.

- 2.14 The Council's preference for brownfield delivery to be reflected in the employment trajectory and monitoring framework is supported by the Commissioners. To ensure that Policy SA14 is clear, positively prepared and effective, that preference should be accompanied by either the removal of the prior-occupation dependency or a clear and time-limited review and release mechanism. This would allow HHH35 to come forward where justified by market demand and supported by the necessary infrastructure.

3. Conclusion

- 3.1 The allocation of HHH35 and the proposed range of employment uses are supported by the Commissioners. Its case does not depend upon establishing a quantitative shortage of employment land. The submitted Plan identifies a distinct role for HHH35 in supporting sustainable growth at Hoo, providing market choice and flexibility to respond to occupier requirements and assisting the potential relocation of businesses from Medway City Estate.
- 3.2 The Commissioners' concern is limited to making the delivery of HHH35 dependent upon the prior occupation of employment sites outside its control. B12 (Employment Land Needs Assessment) does not itself recommend such a dependency, and Policy SA14 does not currently contain a defined monitoring and release mechanism. A focused clarification would retain the Council's preference for brownfield delivery while ensuring that HHH35 can provide market choice and an effective contingency where circumstances justify its earlier delivery.
- 3.3 The Council is therefore invited to agree a modification to criterion 4 of Policy SA14 along the following lines:
- "The Kingsnorth Expansion Area (HHH35) may come forward during the plan period in response to market demand and the delivery of planned growth on the Hoo Peninsula, subject to the timely provision of necessary infrastructure."*
- 3.4 As a consequential amendment, the Plan-period entry for HHH35 in the site-specific information table should be changed from '11+' to '6–10, 11+' so that the employment trajectory does not itself preclude earlier delivery.

Contact

Andrew Watson
Director

01732789785
07850311337
AJWatson@savills.com

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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