

Medway Local Plan: EiP Hearings
Written Statement on behalf of Hoo Consortium
Reg 19 Submission ID: E.184
Further Submissions (June/July 2026) ID.31

Inspectors' Matter 3: Meeting Housing Needs

Housing Supply

ISSUE: 3.6

Does the Plan clearly set out the expected “planned-for” sources of housing supply to meet the identified housing requirement?

ISSUE: 3.8

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

ISSUE: 3.10

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

[COMMENTARY - EFFECTIVENESS]

- 1.1 The Hoo Consortium control the greatest proportion of land on the Hoo Peninsula that is proposed to deliver the majority of the social, economic and environmental changes in the Local Plan. Not just “housing sites”, but also new employment opportunities, supporting community infrastructure (ie. schools, health facilities), retail provision and provision for significant wider environmental enhancements.
- 1.2 The Hoo Consortium control the following proposed allocation sites:
 - HHH6, Land north west Ratcliffe Highway, Chattenden
 - HHH12, Land south of Main Road, Hoo St Werburgh
 - HHH19, Deangate Retail Park, Flanders Farm **[Retail/Employment]**

Reference: Hoo Consortium/A3

- HHH22 & HHH31, Land either side of Roper's Lane, Hoo St Werburgh
- HHH24, Land north of Stoke Road and east of Walnut Tree Grove, Hoo St Werburgh
- HHH25, Adjacent to Yew Tree Lodge land to the south of Stoke Road, Hoo St Werburgh
- HHH26, North of Christmas Lane, east of High Halstow
- HHH29, Parcel north of Christmas Lane, High Halstow
- HHH33, Land south of Stoke Road adjacent Jacobs Lane, Hoo St Werburgh
- HHH35, Land at Kingsnorth Expansion Area [**Employment**]

1.3 In terms of variances with the council's trajectory, updates in respect of the following sites are documented below.

- HHH6 - (550 dwellings) anticipated commencement year is 2027 ahead of the anticipated commencement year of 2030 in as set out in the Trajectory.
- HHH12 – (1,800) The annual delivery rates in the first three years commencing from 2030/31 should be adjusted downwards from 188 dpa to 100 dpa to enable the site to become established in the market.
- HHH24 (85 dwellings) Planning consent granted for 75 dwelling units in 2026 – 10 less than noted in the trajectory. Development completion will still be achieved within the first five years of the plan period.
- HHH25 - (100 dwellings) Development has commenced 2 years ahead of the anticipated commencement year of 2028 in the Trajectory.
- HHH22 and HHH31 – Land either side of Roper's Lane: the Church Commissioners confirm that the trajectory [Ref: B22.5] is an appropriate basis for the Examination. It assumes delivery commencing in 2031/32 at 188 dpa, resulting in 1,880 dwellings within the Plan period. A further 1,320 dwellings would be delivered after 2041, giving a total scheme capacity of 3,200 dwellings¹. The detailed sequencing of individual parcels will be refined through the masterplanning process and alongside the delivery of the necessary infrastructure, but no amendment to the overall trajectory is proposed.

1.4 From a highways perspective, the **Jacobs modelling** [Refs: B18.7 et al] has identified constraints on the highway network which has informed the development of interim mitigation measures. These have been aligned with the housing trajectory to support the phased delivery of development, enabling early growth to come forward whilst longer-term interventions are progressed. Highway constraints have therefore been reflected in delivery timings through a

¹ This is consistent with the Church Commissioners' Regulation 19 representations

Reference: Hoo Consortium/A3

phased approach to infrastructure provision, with site capacities and trajectories based on the current understanding of network performance and mitigation requirements.

[Modification Required]

- 1.5 In order to make the Plan more “**effective**”, we would suggest that some minor Modifications are required in respect of the present Housing Trajectory [**Ref: B22.5**] to reflect the above observations, and the Hoo Consortium will continue to work positively with the Council in this regard.

Housing Mix (Policy T2)

ISSUE: 3.14

What evidence demonstrates that the proposed housing mix requirements are deliverable across strategic allocations, brownfield regeneration sites and windfall developments, and have developers, housebuilders and registered providers been engaged in testing the proposed approach?

ISSUE: 3.15

How will housing mix requirements be applied and managed on large strategic sites delivered over extended periods, and what flexibility exists within the policy framework to respond to changing housing needs and market conditions?

- 1.6 The **Local Plan Viability Assessment Update** (June 2025, paras 8.77 – 8.44) [Ref: B5] tests a housing mix informed by the **Local Housing Needs Assessment** [Ref: B10]. The modelling differentiates between development typologies, with a greater proportion of smaller units in urban and flatted schemes and more family housing in lower-density greenfield schemes. Table 9.2 includes a specific Chattenden and Hoo St Werburgh strategic-site typology.
- 1.7 We can confirm that the Hoo Consortium has worked closely with the LPA in establishing the anticipated capacity for each site. This is also referenced in Viability Assessment (Para 3.18 and 8.82) concerning the appropriate mix on strategic and rural sites.
- 1.8 This evidence supports a flexible application of Policy T2. The policy itself requires the mix to be appropriate to the size, location and characteristics of the site. For strategic sites delivered over an extended period, the detailed mix should therefore be agreed through the masterplanning and application processes and reviewed against up-to-date evidence of need, demand and viability as successive phases come forward.

Reference: Hoo Consortium/A3

ISSUE: 3.16

To what extent have housing mix requirements been incorporated into the viability evidence, and what evidence demonstrates that they remain viable when considered alongside affordable housing, infrastructure contributions and other policy requirements? How will competing policy requirements be balanced where viability pressures arise?

1.9 Our response to this issue is addressed in our remaining responses below.

Affordable Housing (Policy T3)

ISSUE: 3.21

To what extent have affordable housing requirements been tested through the viability evidence, and what evidence demonstrates that they remain viable when considered alongside infrastructure requirements, biodiversity net gain, climate change measures and other policy obligations?

ISSUE: 3.23

What flexibility exists within the policy framework to respond to changing market conditions, viability circumstances, government policy and local housing needs over the Plan period, and how will decisions be made where viability pressures arise?

1.10 The **Medway Local Plan Viability Assessment** [Ref: B5] adopted a housing mix based on the results of the **2025 Local Housing Needs Assessment** [Ref: B10] to ensure the affordable housing requirements were considered in a viability context. The Viability Assessment further included infrastructure costs and contributions as estimated in the **Infrastructure Delivery Schedule** [Ref: B2] alongside all other policy requirements a set out in Section 8 of the Viability Assessment.

1.11 To ensure the competing policy requirements are balanced where viability pressure arises a range sensitivity tests have been undertaken in the Viability Assessment such as;

- Appendix 13 – varied Developers return
- Appendix 14 – varied amount of affordable housing and differing tenure mix
- Appendix 15 – varied policy requirements such as increased accessibility standards and levels of biodiversity net gain
- Appendix 16 – varied development costs and sales values

Reference: Hoo Consortium/A3

- 1.11 The level of affordable housing has been set to ensure it remains deliverable in many of the sensitivity testing scenarios, equally different value areas have been assessed with differing levels of AH set or those areas to ensure site a viable and deliverable across district in different value locations.
- 1.12 We importantly note the adopted **Developer Contributions and Obligations Guide (June 2026)** [Ref: B4 – as updated, June 2026] will be applied flexibly and lawfully on a site-by-site basis, in full compliance with Reg 122 of the Community Infrastructure Levy Regulations 2010. It is essential that contributions are demonstrably necessary, directly related to development, and fairly and reasonably related in scale and kind, particularly for the strategic allocations which are complex.
- 1.13 The **Developer Contributions and Obligations Guide** (June 2026, Para 4.1.6) confirms that the Council will negotiate developer contributions for strategic growth areas on a site-by-site basis.
- 1.14 We note that a similar approach was deployed by the LPA in its recent S106 negotiations regarding several strategic sites on the Hoo Peninsula, and as this is what is reflected in the Submission Local Plan, we have every expectation that this will continue with the remaining strategic sites on the Hoo Peninsula. For example, we understand the following differing level of S106 contributions have recently been agreed to take account of provision of on-site facilities and ensure site viability:

<u>Applicant</u>	<u>Application No</u>	<u>S106 contributions Agreed on a per plot basis</u>
Taylor Wimpey	MC/24/2022 Appeal Decision Pending	£36,000 per plot
Redrow	MC/23/0855	£31,461 per plot
Gladman	MC/23/1934	£37,083 per plot
Dean Lewis Estates	MC/25/0701	£21,925.60 per plot
Church Commissioners & Esquire Homes	MC/23/2857	£17,608 per plot

End