

Land South of Lower Rainham Road

Medway Local Plan Examination

Matter 2 Vision, Spatial Development Strategy and Strategic Objectives

Date of report: 27 August 2026

PREPARED FOR

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1. Introduction

- 1.1 This Hearing Statement has been prepared by Savills on behalf of Catesby Strategic Land Ltd. (Catesby). Catesby is the promoter of Land South of Lower Rainham Road (herein referred to as 'the Site' or the Land Availability Assessment reference 'RN5'), which lies to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. The Site has been promoted through all stages of the emerging Medway Local Plan
- 1.2 Catesby is also promoting the Land at Stokes Road in Allhallows (Site references AS18 and AS22). Separate Hearing Statements have been prepared in relation to this Site and Catesby's views regarding the Local Plan's overall soundness. This Hearing Statement focuses on site-specific matters only and should be read alongside the Hearing Statements submitted for the Land at Stokes Road.
- 1.3 The Site was submitted to Medway Council as part of the Call for Sites exercise between November 2022 and February 2023. The Site was subsequently identified under reference RN5 by Medway Council (MC) as set out in the Land Availability Assessment (LAA). Catesby submitted representations to the Regulation 18a consultation in October 2023, the Regulation 18b in September 2024, the Regulation 19 in August 2025, and the Medway Evidence Base in July 2026.
- 1.4 This Hearing Statement responds to Matter 2 of the Inspector's Matters, Issues and Questions (MIQs) that will be discussed at the upcoming hearing sessions, commencing on 15th September 2026.
- 1.5 The emerging Medway Local Plan has been prepared under the 2024 version of the National Planning Policy Framework (NPPF) and thus, comments within this statement refer to paragraphs within this iteration of the NPPF.
- 1.6 At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within Paragraph 36 of the NPPF (2024). As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process. The comments raised within this hearing statement raise concerns regarding MC's approach and so the overall soundness of the plan.
- 1.7 The Site comprises four interconnected, irregularly shaped parcels of greenfield land covering approximately 30.21 hectares to the east of Gillingham. It is identified as Site Reference RN5 within the Land Availability Assessment (LAA). Adjacent, to the south east of the Site, is the location of the Rainham Parkside Village allocation (LAA reference RN9 and draft policy SA10). Together, these areas are located within the 'North of Rainham' Spatial Development Option considered within the Sustainability Appraisal. Catesby consider a wider allocation covering both the Site and RN9 allowing for a more holistic, landscape-led scheme to come forward that increases housing delivery and ensures that the proposed infrastructure required to support the growth is delivered.

2. Response to the Inspectors Questions

Matter 2: Vision, Spatial Development Strategy and Strategic Objectives

Issues

Whether the Plan identifies a clear Vision and Spatial Development Strategy for Medway that are positively prepared, justified, effective and consistent with national policy.

Whether the Strategic Objectives are clear, positively prepared, justified, effective and in accordance with national policy.

Combined response to Q 2.4 – 2.5

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?

Q2.5 How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?

- 2.1 Chapter 3 of the Submission Local Plan sets out the spatial development strategy and the context underpinning its preparation. Whilst MC does not explicitly identify the key factors informing the strategy, the supporting text indicates that considerations relating to land availability, housing need, Green Belt release and infrastructure delivery have played a significant role in shaping the preferred approach.
- 2.2 At paragraph 3.1.8 of the Submission Local Plan, MC explain that “*In defining options, the Council has considered all potential locations, including land in the Metropolitan Green Belt*”. However, no detail on the considered options is provided nor are details of why MC has proceeded with the proposed spatial development strategy above others or how the options have been considered against the matters set out above. As set out in our response to Matter 1 MIQs and previous representations, it is not considered that sufficient testing of the reasonable alternatives has been carried out as part of the Sustainability Appraisal (SA) process. Thus, there is no clear conclusion as to why MC has proceeded with the proposed spatial development strategy.
- 2.3 The Plan therefore fails to provide a transparent explanation of how competing factors were balanced and how the preferred strategy emerged from the assessment of alternatives. As a result, it is not possible to clearly identify why the chosen strategy is considered the most appropriate option.

Land Availability

- 2.4 Land availability is identified as a key factor informing the spatial strategy. However, Catesby has consistently raised concerns regarding the approach taken to site assessment and selection. Most recently, in representations submitted in response to the updated evidence base consultation (July 2026), it was concluded that the Site Selection Topic Paper still failed to demonstrate a consistent and transparent assessment methodology. In particular, concerns remain regarding the differing conclusions reached for sites RN5 and RN9. The assessments identify similar constraints, with the principal distinction being a marginal difference in the extent of contaminated land. Notwithstanding

this, RN9 was assessed as suitable and achievable, whereas RN5 was not. If land availability is to be relied upon as a key determinant of the strategy, it is essential that the evidence base provides a robust and clearly evidenced justification for these conclusions. This is necessary both to ensure an accurate understanding of site availability and to enable reasonable alternatives to be assessed on a consistent basis, allowing a sound and evidence-based conclusion to be reached on the preferred option. This simply does not appear to have been completed.

Green Belt

- 2.5 The Spatial Strategy explains that exceptional circumstances have been demonstrated for the release of Green Belt land, notably land to the West of Strood (Draft Policy SA6). However, the preparation of the Plan has not adequately demonstrated compliance with national policy. The Plan is being examined against the December 2024 NPPF, which states at paragraph 147 that:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

- 2.6 In Catesby's view, the evidence base does not demonstrate that all reasonable alternatives have been fully assessed before the release of Green Belt land was proposed. In particular, alternative growth opportunities outside the Green Belt, including sites in North Rainham (such as Land south of Lower Rainham Road (RN5)) that are capable of accommodating greater levels of development outside of the Green Belt, have not been robustly tested through the Local Plan, the SA or the site selection process. As a result, it has not been demonstrated that the proposed extent of Green Belt land to be released is necessary to meet development needs. In the absence of such evidence, neither the key factors informing the strategy nor the justification for selecting it are clearly established.

Infrastructure Delivery

- 2.7 The spatial development strategy explains that large scale growth in areas including Lower Rainham, will require:

“Strategic masterplans to manage and phase the delivery of housing, employment, transport and wider infrastructure, and environmental measures”.

- 2.8 Catesby has consistently raised concerns regarding the delivery of infrastructure associated with the Rainham Parkside Village allocation. The proposed strategy relies upon development being delivered by a number of SME housebuilders through individual parcels of fewer than 99 dwellings, with each parcel intended to come forward independently. Whilst Catesby supports both the allocation in principle and the role of SMEs in housing delivery, it remains concerned that the growth area has not been subject to sufficient testing through the plan-making process. In particular, MC has failed to assess the entirety of the Lower Rainham area, including Land South of Lower Rainham Road (RN5), as a reasonable alternative.
- 2.9 Had a comprehensive assessment of the wider Lower Rainham area been undertaken, it would have demonstrated the benefits of a coordinated allocation encompassing both RN5 and RN9. Such an approach would support the delivery of additional housing, provide a more comprehensive and sustainable infrastructure strategy, and improve overall viability and deliverability. Importantly, the inclusion of RN5 would enable infrastructure costs to be distributed across a larger development area and a greater number of dwellings, reducing the burden on individual SME developers and increasing confidence that the necessary infrastructure to support these new dwellings can be delivered in a timely manner. The failure to assess this alternative means that the Council has not adequately considered whether a more effective, deliverable and sustainable development strategy exists for the area.
- 2.10 If infrastructure delivery is a principal factor informing the strategy, the Council should have assessed whether alternative development patterns could provide a more effective mechanism for delivering

strategic infrastructure. The absence of any assessment of a coordinated RN5 and RN9 allocation means that the Council has not demonstrated that its preferred approach represents the most effective or deliverable strategy.

Summary

- 2.11 Whilst the Plan identifies a number of factors that have influenced the spatial development strategy, including land availability, Green Belt considerations and infrastructure delivery, it does not clearly explain how these factors were balanced in selecting the preferred approach. Furthermore, the evidence base does not demonstrate that reasonable alternatives were consistently and comprehensively assessed before strategic choices were made. Consequently, it has not been demonstrated that the submitted strategy represents the most appropriate option when considered against the reasonable alternatives, nor has a clear and robust justification been provided for its selection.

3. Conclusion

- 3.1 In response to the question 2.4 and 2.5 of the Inspectors MIQs relating to the examination of MC Local Plan, Catesby has raised concerns relating to MC's approach to the spatial development strategy and whether MC has considered other reasonable approaches.
- 3.2 MC has set out considerations relating to the proposed spatial development strategy but failed to adequately outline the matters that have informed the strategy or how they have been assessed. Nor does the supporting evidence base demonstrate that reasonable alternatives have been consistently and comprehensively considered before strategic choices were made.
- 3.3 Catesby raise specific concerns regarding the treatment of Land South of Lower Rainham Road (RN5), the failure to fully explore different growth opportunities in North Rainham, and the reliance on Green Belt release without adequately demonstrating that all non-Green Belt alternatives have been exhausted.
- 3.4 Accordingly, Catesby concludes that MC has not appropriately assessed or justified the spatial development strategy and in the absence of additional information/evidence to support the reasoning behind the proposed spatial development strategy, the Plan cannot be considered justified.

END

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