EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 10 - Health, Communities & Infrastructure

ISSUE

Whether the Plan provides a robust framework for improving health and wellbeing, reducing health inequalities, sustaining and enhancing local communities and infrastructure delivery which is justified, effective and consistent with national policy.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	10.27 and 10.28-10.53
Hearing session	18 November 2026 - AM session (9.30 am - 1.00 pm)
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Submitted on behalf of The Independent Group (TIG) on Medway Council
Councillor Michael Pearce, Planning Spokesman

1. PURPOSE AND STATUS OF THIS STATEMENT

1.1 This Hearing Statement is submitted by The Independent Group (TIG) in relation to Matter 10 - Health, Communities & Infrastructure. It addresses MIQ 10.27 and MIQs 10.28-10.53, insofar as they concern healthcare and infrastructure delivery, and should be read alongside TIG's Regulation 19 representations listed in section 6.

1.2 This statement does not introduce a new objection. TIG's Regulation 19 case expressly challenged the effectiveness and deliverability of the Hoo Peninsula growth strategy because key transport, education, healthcare, wastewater and community infrastructure was not demonstrated to be secured, funded and delivered in step with development. Later examination material is referred to only to test whether those existing concerns have now been resolved.

1.3 TIG does not seek to answer every Matter 10 question. It focuses on the questions which directly engage its Regulation 19 case, particularly Policy S24 and the infrastructure needed to support strategic growth on the Hoo Peninsula.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

2.1 TIG acknowledges that the infrastructure evidence has advanced. The December 2025 Infrastructure Delivery Plan (B2) identifies a wider range of projects, costs, delivery bodies and indicative timings than was available at Regulation 19. MLP/ED21 records Southern Water's view that identified network constraints may be addressed, subject to necessary reinforcement and occupation phasing.

2.2 The remaining issue is whether the Plan provides a sufficiently certain and enforceable delivery framework for the critical infrastructure on which its spatial strategy depends. TIG considers that this has not yet been demonstrated for Hoo. Policy SA8 says Hoo-specific infrastructure triggers are identified in a 'Hoo Peninsula Infrastructure Plan', but TIG has not identified such a plan as a submission or examination document. The current Hoo Consortium SoCG (MLP/ED24B) does not record agreement on detailed infrastructure cost, phasing, funding, apportionment or delivery mechanism; several critical Hoo projects in B2 rely on Section 106 and/or 'other funding to be identified'; and the monitoring framework measures planning obligations rather than timely completion of critical infrastructure.

Soundness test engaged

2.3 The relevant soundness tests are principally whether the Plan is justified and effective. Where strategic development depends upon infrastructure to make it sustainable and acceptable, there needs to be a clear relationship between development quantum, occupation, infrastructure triggers, funding responsibility, delivery and contingency.

Main Modification / action sought

2.4 Focused Main Modifications could potentially address these matters if a sufficiently detailed and evidenced delivery mechanism can be established. If the required infrastructure cannot be shown to be deliverable in step with growth, the scale, phasing or distribution of that growth would need to be reconsidered.

2.5 Without prejudice to TIG's wider Regulation 19 position, if the identified infrastructure deficiencies cannot be remedied through limited further work and Main Modifications without materially recasting the submitted spatial strategy, TIG considers that the appropriate response would be non-adoption, withdrawal and re-preparation of the Plan. In particular, if necessary infrastructure cannot be shown to be deliverable in step with the scale and phasing of development proposed, TIG does not accept that the necessary infrastructure should simply be reduced or deferred in order to preserve the submitted development strategy.

3. RESPONSES TO THE INSPECTORS' MIQs

3.0 The changes identified below are without prejudice to TIG's wider Regulation 19 position and paragraph 2.5 above. They are sought only insofar as the infrastructure delivery issues can be remedied through limited further work and Main Modifications without materially recasting the submitted spatial strategy.

3.1 MIQ 10.27 - NHS Kent and Medway ICB modifications

TIG's answer: The present examination material does not yet identify the necessary modifications with sufficient precision.

Reasoning...

3.1.1 MLP/ED24A section 2.14 records matters raised by NHS Kent and Medway ICB. For Hoo, it specifically identifies the need to clarify anticipated housing delivery so that expansion of existing healthcare facilities can be considered to meet interim demand before a new integrated healthcare facility is delivered at no cost to the NHS. Paragraph 2.14.4 states that these matters remain under discussion.

3.1.2 This bears directly on TIG's existing concern about infrastructure lag. Policy SA8 identifies HHH22 east of Hoo as the preferred main centre, including health and leisure services. MLP/ED6 shows no HHH22/31 completions in the first five years after adoption, whereas HHH8 west of Hoo is shown delivering 280 dwellings and HHH6 at Chattenden 83 dwellings in that period. MLP/ED24B indicates that the Hoo Consortium considers HHH6 capable of commencing earlier still. The NHS position therefore reinforces the need for an explicit interim healthcare-capacity mechanism rather than reliance on the eventual integrated facility.

3.1.3 The Council should identify the exact Main Modifications arising from its NHS discussions. For Hoo, the relevant policies should secure both interim capacity and the strategic facility, with delivery responsibility and phasing linked to housing occupation.

Regulation 19 basis: TIG Main Representation, Chapter 2 and Chapter 8; TIG NPPF paragraph 11(b) Representation, Chapter 8, particularly sections 8.5-8.7.

Change necessary: Amend the relevant policies, including Policy S24 and/or Policy SA8 and Policy T29 as appropriate, to reflect the agreed NHS requirements and secure interim and long-term healthcare capacity in step with development.

3.2 MIQs 10.28-10.33 - Strategic role, requirements and evidence

TIG's answer: Policy S24 is strategically important, but the evidence does not yet demonstrate a complete delivery framework for all critical infrastructure.

Reasoning...

3.2.1 Policy S24 is strategically important because it is intended to connect the growth strategy to infrastructure capacity, phasing and developer obligations. This is especially important on Hoo, where B2 itself identifies the limited existing service base and transport network and says schools, GP facilities, transport, community, cultural and leisure facilities will be essential.

3.2.2 B2 and Policy SA8 identify critical Hoo requirements including major highway works, new schools, health facilities, utilities, community and sports provision. However, SA8 criterion 6 says infrastructure is linked to phased growth 'with triggers identified in the Hoo Peninsula Infrastructure Plan'; B2 paragraph 2.7.5 repeats that position. TIG has not identified a separate Hoo Peninsula Infrastructure Plan within the submission or examination documents reviewed. If the Council relies on one, its status, content and relationship with the statutory Plan should be identified. If it does not yet exist, the triggers on which SA8 expressly relies have not been demonstrated.

3.2.3 An IDP described as a 'living' and iterative document is useful for infrastructure planning, but without appropriate policy hooks and defined triggers it is not a substitute for the certainty needed where infrastructure is a prerequisite to strategic development.

Regulation 19 basis: TIG Main Representation, Chapter 2 and Chapter 8; TIG NPPF paragraph 11(b) Representation, Chapter 8.

Change necessary: Identify and place before the Examination the Hoo Peninsula Infrastructure Plan, or an equivalent infrastructure phasing and trigger schedule, and ensure its critical requirements are secured through Policies SA8 and S24.

3.3 MIQs 10.34-10.37 - Funding and delivery

TIG's answer: Funding sources are identified in broad terms, but sufficient certainty for all critical Hoo infrastructure has not yet been demonstrated.

Reasoning...

3.3.1 B2 identifies significant Hoo costs. Four Elms Roundabout is critical at an indicative £51-84 million; the new six-form-entry secondary school is critical at about £45-50 million; a new Hoo primary and community health facility is critical at about £8.4 million; and a new Hoo sports centre is critical at about £30 million. For health, sports and community-hub projects the schedule includes Section 106 and 'other funding to be identified'. B2 paragraph 2.9.3 also states that major junction mitigation is likely to require external funding support.

3.3.2 The June 2026 consultation draft Developer Contributions Guide says strategic growth areas will be negotiated case by case, with priority given to strategic infrastructure. However, it does not establish what each strategic site will pay, when contributions become due, whether forward funding is required or how any shortfall will be addressed.

3.3.3 MLP/ED24B is therefore important. Although the Council and Hoo Consortium agree the housing trajectory in principle, paragraph 1.1.9 expressly states that the SoCG does not constitute agreement on detailed infrastructure form, cost, phasing, land-take, funding, apportionment or delivery mechanism. It says it will be updated before Phase 2. Unless a later agreed version resolves these matters, the principal strategic landowners and Council have not yet demonstrated an agreed delivery package.

3.3.4 The Viability Assessment (B5) also warrants caution. It estimated Chattenden and Hoo strategic infrastructure/mitigation at £35,283 per dwelling, while Table 10.4c shows a modelled maximum developer contribution of £35,000 per dwelling at 30% affordable housing under the draft policies. The Council's B5 modelling does not conclude Hoo is unviable; it suggests the sites could bear estimated contributions under the assumptions tested. However, it also describes strategic infrastructure requirements as work in progress, recommends continued engagement and recommends inclusion only where sites can be demonstrated viable. The evidence therefore does not show comfortable headroom for unresolved infrastructure costs.

Regulation 19 basis: TIG Main Representation, Chapters 2 and 8; TIG NPPF paragraph 11(b) Representation, sections 8.3-8.7 and 9.4.

Change necessary: Demonstrate, for critical infrastructure, the responsible delivery body, indicative cost, secured or expected funding source, developer apportionment, timing and contingency for any funding gap.

3.4 MIQs 10.38-10.41 - Critical dependencies, triggers and phasing

TIG's answer: Critical dependencies are identified, but the Plan does not yet contain sufficiently clear strategic triggers.

Reasoning...

3.4.1 Policy S24 calls for development to be phased to reflect timely infrastructure delivery and sets out a preferred sequence beginning with on-site delivery ahead of occupation. However, paragraph 10.5.12 says sequencing will be negotiated between the developer and Council. That is materially different from identifying enforceable strategic thresholds for infrastructure on which the spatial strategy depends.

3.4.2 The Hoo trajectory illustrates the issue. Early development is expected west of Hoo and at Chattenden before HHH22/31 east of Hoo, where SA8 locates the preferred main centre, health/leisure services and new secondary school. This raises a material soundness concern unless the Plan demonstrates what interim infrastructure is required, the housing thresholds at which it must be available and the consequences if later strategic facilities are delayed.

3.4.3 MLP/ED21 provides a useful model. Southern Water agrees that local network constraints are not permanent barriers, but that protective policy text should phase occupation to necessary reinforcement and describes the typical control as 'no occupation until capacity is available'. That is the type of outcome-based trigger which is less clear for other critical Hoo infrastructure.

3.4.4 There is also an apparent tension between Policy S24 and B2. Policy S24 permits viability appraisal where a developer considers infrastructure requirements unachievable. B2 paragraph 2.9.5 says strategic infrastructure in strategic growth areas will be funded by developers on a fair and proportionate basis and 'will not be subject to viability review'. The Plan should make clear which approach prevails. Critical infrastructure relied upon to make development acceptable should not simply be diluted through later viability negotiation; if it cannot be delivered, development quantum or phasing may need to change.

Regulation 19 basis: TIG NPPF paragraph 11(b) Representation, sections 8.6-8.7 and 9.4; TIG Main Representation, Chapter 8.

Change necessary: Insert clear occupation/development triggers for critical strategic infrastructure, including an express mechanism to restrict or rephase development if the required infrastructure is delayed or cannot be funded.

3.5 MIQs 10.42-10.44 - Infrastructure providers

TIG's answer: There has been substantial provider engagement, but full delivery certainty is not yet demonstrated.

Reasoning...

3.5.1 MLP/ED21 records Southern Water's position that identified network constraints may be addressed through engineering solutions and occupation phasing. It also identifies limited local network capacity at multiple allocations and the need for reinforcement before specified occupation levels.

3.5.2 For healthcare, MLP/ED24A confirms continuing collaboration but records that Hoo's housing delivery needs clarification to determine interim expansion before the new integrated facility. For the Hoo Consortium, MLP/ED24B does not yet agree the detailed infrastructure delivery mechanism. These documents demonstrate engagement, but not comprehensive confirmation that all critical assumptions, triggers and funding are agreed and achievable.

Regulation 19 basis: TIG Main Representation, Chapters 2 and 8; TIG NPPF paragraph 11(b) Representation, Chapter 8.

Change necessary: Update the Examination with the final agreed provider/developer positions and translate any necessary phasing or capacity safeguards into the Plan.

3.6 MIQs 10.45-10.48 - Monitoring and contingency

TIG's answer: The proposed monitoring of Policy S24 is not sufficiently focused on infrastructure delivery outcomes.

Reasoning...

3.6.1 A14 monitors Policy S24 through the 'number and value of Section 106 planning obligations (or other legally binding agreements)' with a general target of delivery of identified infrastructure requirements. The amount secured is relevant, but it does not show whether critical infrastructure has actually been completed on time, whether a trigger has been met, whether a funding gap has emerged or whether development is running ahead of infrastructure.

3.6.2 For strategic growth areas, monitoring should identify the status of each critical project, funding secured/outstanding, the relevant trigger, forecast and actual delivery date, occupation against the trigger and any contingency action. Otherwise infrastructure lag may only be identified after it has occurred.

Regulation 19 basis: TIG Main Representation, Chapter 8; TIG NPPF paragraph 11(b) Representation, section 8.6.

Change necessary: Strengthen the Policy S24 monitoring framework to report annually on critical infrastructure milestones, trigger compliance, funding status, slippage and contingency measures.

3.7 MIQs 10.49-10.53 - Consistency and soundness

TIG's answer: Policy S24 is not yet demonstrated to be effective for the Hoo Peninsula without further modifications.

Reasoning...

3.7.1 SA8 relies on Hoo-specific triggers in a Hoo Peninsula Infrastructure Plan, while B2 records comprehensive phasing and triggers as ongoing work. Policy S24 provides general negotiated sequencing. MLP/ED31 proposes an overarching policy requiring Hoo growth to be phased alongside infrastructure, but does not specify project-level triggers or funding responsibilities. The gap between the Hoo housing trajectory and enforceable infrastructure delivery therefore remains.

3.7.2 TIG's Regulation 19 objection was that housing could precede supporting infrastructure. Later evidence identifies projects more clearly and records Southern Water's view that some network constraints could be managed through reinforcement and phasing, but does not resolve TIG's objection. The core concern remains where funding, detailed phasing, apportionment, healthcare transition and enforceable triggers are unresolved.

3.7.3 TIG does not say that every infrastructure project must have final funding legally secured now. The soundness question is whether there is reasonable certainty that infrastructure critical to the chosen scale and distribution of growth can be delivered when required, and whether the Plan prevents development outrunning it. On the present evidence, TIG considers that test has not yet been fully met for Hoo.

Regulation 19 basis: TIG Main Representation, Chapters 2 and 8; TIG NPPF paragraph 11(b) Representation, Chapter 8 and section 9.4.

Change necessary: Main Modify Policies S24 and SA8 so that critical Hoo infrastructure, funding responsibilities, phasing triggers, monitoring and contingency are explicit and enforceable.

4. OVERALL CONCLUSION ON THIS MATTER

4.1 TIG's Regulation 19 infrastructure objection has been materially informed by later evidence. The IDP contains additional detail, Southern Water proposes reinforcement and occupation phasing, and provider engagement continues. These developments do not demonstrate timely delivery of critical infrastructure or resolve TIG's Regulation 19 objections.

4.2 The central soundness concern nevertheless persists. The document said to contain Hoo-specific infrastructure triggers has not been identified in the examination evidence reviewed; the Hoo Consortium's current SoCG does not agree infrastructure cost, phasing, funding or apportionment; NHS arrangements for interim and long-term Hoo healthcare remain under discussion; and several critical projects retain unidentified or mixed funding sources.

4.3 Policy S24 should therefore be strengthened before the Plan is found sound. If clear, deliverable and enforceable triggers and funding mechanisms can be established through focused Main Modifications, TIG accepts that route may be available. If critical infrastructure cannot be shown to come forward in step with development, the response should be to revisit the scale or phasing of the dependent development rather than allow necessary infrastructure to fall away. If that requires a material recasting of the spatial strategy, TIG's wider Regulation 19 position remains applicable.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

5.1 These changes are without prejudice to TIG's wider Regulation 19 position and apply only if the identified issues can be remedied without materially recasting the submitted Plan. For this table, 'EX' denotes an examination action sought rather than proposed Main Modification wording.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M10-01	Policy S24	The policy contains general sequencing principles but no clear strategic occupation thresholds, and its viability wording is not clearly reconciled with B2 paragraph 2.9.5.	Amend S24 so development dependent on critical infrastructure cannot be occupied beyond an identified threshold until that infrastructure is operational or adequate interim provision is available. Clarify that where critical infrastructure cannot be delivered, development must be rephased or its quantum reviewed rather than necessary mitigation simply reduced through viability.	Necessary to make infrastructure delivery effective and tied to the development it supports.
MM-TIG-M10-02	Policies SA8 / S24	SA8 and B2 rely on Hoo-specific triggers said to be contained in a Hoo Peninsula Infrastructure Plan, but TIG has not identified that document in the examination evidence reviewed.	Identify the Hoo Peninsula Infrastructure Plan or equivalent schedule and secure through policy the critical projects, triggers, delivery bodies, indicative costs/funding, apportionment and contingency arrangements required for Hoo and Chattenden.	Necessary to provide the missing bridge between the Hoo trajectory and infrastructure delivery.

MM-TIG-M10-03	Policies T29 / S24 / SA8	MLP/ED24A records unresolved NHS requirements for interim capacity on Hoo before the new integrated healthcare facility.	Insert the agreed NHS-driven wording so that interim healthcare capacity and the strategic Hoo facility are secured in step with housing delivery, with clear triggers and responsibility.	Necessary to avoid healthcare infrastructure lag.
EX-TIG-M10-04	Monitoring Framework / Policy S24	A14 principally monitors the number and value of obligations rather than delivery of critical infrastructure against triggers.	Require annual monitoring of each critical strategic project: funding status, trigger, planned/actual delivery, occupation against trigger, slippage and contingency action.	Necessary to identify and remedy infrastructure delivery failure before development outruns capacity.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19	TIG Main Representation responding to the Regulation 19 Local Plan	Chapter 2; Chapter 8; soundness and infrastructure recommendations
TIG NPPF 11(b)	TIG representation concerning NPPF paragraph 11(b)	Chapter 8; sections 8.3-8.7; section 9.4
A1	Submission Medway Local Plan 2041	Policies T29, S24 and SA8; paras 10.5.1-10.5.14
A14	Monitoring Framework	Health, Communities and Infrastructure - Policy S24 indicator
B2	Infrastructure Delivery Plan (December 2025)	paras 1.2.3-1.2.7, 2.7.1-2.7.7, 2.9.1-2.9.9; Infrastructure Delivery Schedule
B5	Local Plan Viability Assessment Update (June 2025)	Tables 8.11 and 10.4c; conclusions on strategic sites
June 2026 DCG	Medway Developer Contributions and Obligations Guide - consultation document	paras 4.1.3-4.1.7; strategic growth and healthcare contributions
MLP/ED6	Council's Response to Inspectors' Initial Queries	Strategic site delivery appendix - HHH6, HHH8 and HHH22/31
MLP/ED21	Statement of Common Ground with Southern Water	Network capacity constraints and development phasing
MLP/ED24A	Statement of Common Ground with Prescribed Bodies	section 2.14; para 4.2.15
MLP/ED24B	Statement of Common Ground - Hoo Consortium	paras 1.1.9-1.1.10 and 2.1.1-2.1.2

MLP/ED31	Proposed Stepped Housing Requirement and Land Supply (18 September 2026)	Proposed Delivering Sustainable Growth for Medway policy; Hoo Peninsula provision
MLP/ED35	Schedule of Matters, Issues and Questions - Phase 2	Matter 10, MIQ 10.27 and MIQs 10.28-10.53

7. APPENDIX

7.1 No appendix is proposed.

SUBMITTED ON BEHALF OF THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

Councillor Michael Pearce

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Planning Spokesman
29 October 2026

**For the avoidance of any doubt, Councillor Michael Pearce is an Independent Councillor representing Hoo & High Halstow Ward on Medway Council, which is also the Local Planning Authority (LPA). He serves as the Leader and Planning Spokesman for The Independent Group (TIG) on Medway Council - an unwhipped group of Independent councillors representing the Hoo Peninsula (Strood Rural Ward, Hoo & High Halstow Ward, All Saints Ward), formed for administrative purposes and committee entitlement. While Councillor Pearce is a Medway Councillor and member of the LPA's Planning Committee, he does not speak or act on behalf of Medway Council or the LPA, either generally or at formal planning inquiries.*