EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 13 - Site Allocations

ISSUE

Whether the site allocation strategy for Capstone Valley, Hoo St Werburgh and Chattenden, High Halstow, Lower Rainham and the Rural Settlements is justified by proportionate evidence, positively prepared and capable of delivery within the Plan period.

Whether the allocations are supported by adequate infrastructure, environmental mitigation and necessary safeguards.

Whether the policies provide a clear and effective framework consistent with national planning policy.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	13.1-13.5; 13.59, 13.65, 13.67-13.71 and 13.74-13.75; 13.92-13.118; 13.161-13.163; 13.188-13.192, 13.194-13.195, 13.197, 13.201-13.205, 13.209 and 13.211-13.213
Hearing session	24-25 November 2026 - Matter 13 sessions
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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 13 - Site Allocations. It addresses only the Inspectors' questions identified below and should be read alongside TIG's Regulation 19 representations and its Phase 1 Hearing Statements, particularly Matters 2, 3, 5, 6 and 7.

1.2 This statement does not introduce new evidence or new objections. It focuses TIG's existing Regulation 19 case concerning the scale and location of strategic growth on the Hoo Peninsula, reasonable alternatives, infrastructure and delivery, effects on designated habitats and best and most versatile agricultural land, and the west-of-Strood Green Belt allocation. Later examination material is referred to only insofar as it bears upon those existing issues.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

2.1 TIG considers that the site-allocation strategy is not presently demonstrated to be justified or effective insofar as it depends upon major greenfield growth at Hoo St Werburgh and Chattenden, High Halstow and west of Strood, together with additional greenfield employment land at Hoo/Kingsnorth. The issue is whether the scale, distribution, phasing and mitigation package is supported by sufficiently proportionate and certain evidence.

2.2 Policy SA8 is the principal concern. The submitted policy provides around 4,700 homes at Hoo St Werburgh and 600 at Chattenden, with the site table totalling approximately 5,300 homes. Post-Phase 1 evidence reinforces that delivery is infrastructure-led: MLP/ED38 states that Hoo growth is intrinsically linked to highway interventions and cannot realistically be assumed to come forward independently of them. TIG considers that this confirms, rather than removes, the delivery risk identified at Regulation 19.

Soundness test engaged

2.3 Justified; effective; consistent with national policy.

Main Modification / action sought

2.4 TIG seeks a substantial reduction in strategic Hoo Peninsula greenfield growth, with Policy SA8 and Policy SA9 amended to a scale that can be demonstrated to be sustainable, deliverable and environmentally acceptable. Policy SA6 should only remain if the cross-boundary Green Belt premise identified by the Council is sufficiently certain. HHH19 and HHH35 should be deleted from Policy SA14 for the reasons already advanced under Matter 7.

2.5 TIG recognises that limited Main Modifications may in principle be available where they do not materially recast the submitted strategy. It does not concede that the substantial changes sought here can be delivered by that route. If a realistic and lawful site strategy requires fundamental redistribution or replacement of strategic allocations, the Plan should not be adopted and should be withdrawn and re-prepared.

3. RESPONSES TO THE INSPECTORS' MIQs

3.0 The changes identified below are without prejudice to TIG's position at paragraphs 4.2-4.3. TIG does not repeat the detailed Phase 1 case; it applies that evidence to the site-allocation questions now before the examination.

3.1 MIQs 13.1-13.5 - delivery mechanisms, capacities, timing and infrastructure

TIG's answer: The information now available identifies substantial dependencies, but does not yet demonstrate that the capacities and delivery periods for the largest Hoo Peninsula allocations are securely aligned with the timing and funding of the infrastructure needed to unlock them.

Reasoning...

3.1.1 Policy SA8 itself requires a strategic masterplan and a Hoo Peninsula Infrastructure Plan with phasing triggers. The Infrastructure Delivery Plan identifies significant transport, education, health, community and environmental requirements. MLP/ED6 Appendix F also identifies site-specific flood-defence and utility constraints for major Hoo sites. These are not incidental requirements: they are prerequisites which bear directly on capacity, commencement and build-out.

3.1.2 The Council's post-Phase 1 proposed stepped housing requirement (MLP/ED31) expressly explains that many strategic allocations will not deliver at full capacity in the early years because of infrastructure requirements, lead-in periods and build-out constraints. That phasing must be reflected consistently in the allocation policies and delivery evidence.

3.1.3 There is already a material numerical inconsistency requiring clarification. Policy SA8 identifies HHH22/HHH31 for up to 1,700 homes within the plan period, whereas MLP/ED6 Appendix F gives the combined site a total capacity of 3,200 and assumes 1,880 completions within the plan period, with none in the first five years. The policy capacity, housing trajectory and infrastructure assumptions should be reconciled before the allocation is relied upon.

Regulation 19 basis: TIG Main Representation, sections 2.3, 4.4.1, 5.8 and Chapter 8; TIG NPPF 11(b) Representation, Chapter 8; TIG Sites Appraisal.

Change necessary: Update the site-specific tables and supporting delivery framework so each strategic allocation identifies realistic capacity, commencement, annual delivery assumptions, critical infrastructure dependencies, responsible delivery body, funding route and phasing trigger. Where these cannot be demonstrated, reduce the assumed capacity or defer/delete the affected allocation.

3.2 MIQs 13.59, 13.65, 13.67-13.71 and 13.74-13.75 - Policy SA6: Land West of Strood

TIG's answer: Policy SA6 remains dependent upon the cross-boundary Green Belt proposition examined under Matter 5.

Reasoning...

3.2.1 A central issue in TIG's Matter 5 case was the cross-boundary Green Belt dependency. MLP/ED7 records the Council's position that exceptional circumstances would not exist for the Medway side release if the adjoining Gravesham Green Belt release did not occur. Policy SA6 is conceived as a comprehensive cross-boundary growth location. Its site capacity, infrastructure and delivery assumptions therefore cannot be considered independently of that premise.

3.2.2 Transport certainty is also cross-boundary. MLP/ED20 records that further work was requested to determine whether the M2 Junction 1 concept design can accommodate the combined traffic from Medway and Gravesham allocations, when the scheme would be required and how its delivery might be funded. That work bears directly on MIQs 13.74-13.75 and demonstrates that a key strategic-road dependency was not settled in the submitted policy framework.

3.2.3 Resolution of the Chapter Farm and cross-boundary delivery dependency would not, of itself, establish that SA6 is justified, deliverable or sound. TIG's other objections concerning Green Belt release, transport impacts and the wider spatial strategy remain. If that dependency is not sufficiently certain, the Medway Green Belt component should remain in the Green Belt and SA6 should be deleted or amended consequentially. TIG's support for suitable brownfield and regeneration development in urban Strood should not be read as support for greenfield Green Belt development west of Strood.

Regulation 19 basis: TIG Main Representation, Chapter 5 and Chapter 7; E.37 / SDLP 111-112.

Change necessary: Apply the modifications sought in TIG's Matter 5 Hearing Statement to Policy S7, the Policies Map and Policy SA6, including consequential housing redistribution if the west-of-Strood Green Belt release is not justified.

3.3 MIQs 13.92-13.94 - Policy SA8: justification, settlement hierarchy and alternatives

TIG's answer: The evidence does not demonstrate that directing approximately 5,300 homes across Policy SA8 is the most appropriate site strategy when reasonable alternatives and the area's acknowledged constraints are considered together.

Reasoning...

3.3.1 The Plan acknowledges Hoo's service, transport, landscape and environmental constraints. The Sustainability Appraisal identified an Urban Regeneration Focus and recorded stronger performance for that option against several objectives, including climate-change mitigation and transport/accessibility. The final site package changed materially, but the evidence does not transparently demonstrate an equivalent fresh strategic comparison showing why the final Hoo quantum remained the optimum balance.

3.3.2 Appendix J gives similar selection reasons for the largest Hoo sites - delivery of the Vision and opportunities for sustainable development and improved services. That does not demonstrate why this scale of rural growth is preferable to a lower Hoo quantum combined with greater suitable urban/brownfield capacity.

Regulation 19 basis: TIG Main Representation, Chapters 2 and 5; TIG Sites Appraisal; E.37 / SDLP 107-112 and 118.

Change necessary: Reduce Policy SA8's strategic greenfield quantum to the level demonstrated to be justified after transparent comparison with reasonable alternatives, with consequential deletion/reduction of the large allocations that cannot satisfy that test.

3.4 MIQs 13.95-13.106 - Policy SA8: transport, environment, infrastructure and delivery

TIG's answer: Sufficient certainty has not yet been demonstrated for the submitted scale and timing of SA8.

Reasoning...

3.4.1 MLP/ED38 materially sharpens the transport issue. It states that Hoo Peninsula growth is dependent on a package of highway interventions and cannot realistically be assumed to come forward independently of them. It identifies mitigation at A228 Peninsula Way/Main Road Hoo by Year 5, with full works costed at about £11-18 million, and further mitigation at Dux Court Road/Bells Lane and Ropers Lane at or beyond Year 10. The Council also intends to commission a Monitor and Manage Mitigation Strategy for interim schemes. This supports binding phasing triggers rather than reliance on later mitigation.

3.4.2 MLP/ED20 adds an unresolved strategic-road point: National Highways identified the M2 Junction 1 eastbound merge upgrade as a required improvement omitted from Policy SA8 and recorded the matter as still under discussion, with policy amendments anticipated if necessary. The submitted SA8 transport list is therefore not demonstrably complete.

3.4.3 MLP/ED6 Appendix F identifies equally material site-specific constraints. HHH12 requires approximately 2.7 km of flood-defence raising, estimated at about £3.15 million, contains a critical Southern Water rising main and has limited wastewater-network capacity. HHH22/HHH31 requires approximately 3.8 km of flood-defence raising, estimated at about £4.4 million, is over 500m from the wastewater network and also has limited network capacity. Both are programmed with no completions in the first five years.

3.4.4 Environmental mitigation is also a delivery dependency. The Submission HRA acknowledges that Bird Wise may not completely address allocations close to the North Kent Marshes and relies additionally on the Hoo Peninsula Strategic Environmental Programme. TIG's Matter 6 statement records that the programme and final policy framework were still being developed. The Plan's Habitats Regulations conclusions must rest on sufficiently certain mitigation at plan-making stage; any unresolved integrity question cannot simply be deferred to planning applications or occupation conditions. SA8 must also prevent development or occupation ahead of mitigation where needed. The strategic masterplan must address Chattenden Conservation Area, listed buildings and archaeological interests under MIQ 13.103.

Regulation 19 basis: TIG Main Representation, Chapters 4-6 and 8; TIG NPPF 11(b) Representation; TIG 400m and 1km Buffer Representation; TIG Sites Appraisal.

Change necessary: Reduce/rephase SA8 to the capacity supported by secured infrastructure and completed environmental assessment. Require binding phasing triggers so development does not proceed ahead of necessary transport, water/wastewater, education, health and ecological mitigation. Where a large component site cannot meet those requirements, delete or reduce it.

3.5 MIQs 13.107-13.118 - Policy SA9: High Halstow

TIG's answer: The proposed scale has not been demonstrated to be proportionate to High Halstow's role, environmental setting and infrastructure capacity.

Reasoning...

3.5.1 SA9 provides up to 820 homes: HHH26 up to 760, HHH29 up to 55 and HHH15 up to 5. The Plan describes High Halstow as an historic village with a rural character and setting close to important environmental sites. Its own supporting text records neighbourhood-plan work identifying particular local needs, including downsizing and self/custom build; that evidence does not by itself explain the strategic-scale extension proposed.

3.5.2 MLP/ED6 recorded the committee resolution of 11 March 2026 to approve HHH26 subject to a Section 106 agreement and assumed 350 completions in the first five years. Planning permission MC/23/0855 was issued on 22 July 2026 for 270 homes in detail and up to 490 in outline (up to 760 in total). Permission does not establish the timing of delivery or settle the justification for SA9's 820-home village strategy, cumulative effects or infrastructure provision.

3.5.3 SA9 should distinguish the permission for up to 760 homes at HHH26 from additional policy-led growth. TIG's Regulation 19 environmental concerns remain. That permission does not independently justify HHH29 or wider expansion. Any retained growth must be tied to timely infrastructure and effective ecological and landscape safeguards.

Regulation 19 basis: TIG Main Representation, sections 4-5 and 8; TIG NPPF 11(b) Representation; TIG Sites Appraisal.

Change necessary: Delete HHH29 and any independently unjustified uncommitted element of SA9. Identify HHH26 as a permission for up to 760 homes without assuming delivery of the full quantum within the Plan period; secure necessary cumulative infrastructure, ecological and landscape safeguards.

3.6 MIQs 13.161-13.163 - cumulative certainty for Policies SA7-SA12

TIG's answer: Not yet demonstrated for the Hoo Peninsula component.

Reasoning...

3.6.1 The relevant effects are cumulative. Strategic road capacity, schools, healthcare, water/wastewater, recreational pressure, green infrastructure and the Hoo Peninsula environmental programme serve or respond to multiple allocations. SA8 and SA9 therefore require evidence that the combined infrastructure and mitigation programme can be delivered in step with the combined development trajectory.

3.6.2 MLP/ED31 reinforces this point by proposing a stepped requirement specifically because strategic sites have infrastructure and lead-in constraints. The corresponding site policies should contain the mechanisms needed if infrastructure or mitigation is delayed, including clear triggers, ceilings on occupation where necessary and review/intervention arrangements.

Regulation 19 basis: TIG Main Representation, Chapters 4-6 and 8; TIG Sites Appraisal.

Change necessary: Introduce an effective cumulative phasing and monitoring framework for Hoo Peninsula allocations and reduce site capacities where the infrastructure/mitigation programme cannot support the stated trajectory.

3.7 MIQs 13.188-13.192, 13.194-13.195, 13.197, 13.201-13.205, 13.209 and 13.211-13.213 - Policy SA14

TIG's answer: Policy SA14 is not justified insofar as it allocates HHH19 and HHH35 as additional greenfield employment land.

Reasoning...

3.7.1 B12 identifies a minimum industrial requirement of 204,000 sq m against 883,812 sq m of supply and no pressing need for further quantitative or qualitative allocations (paragraphs 7.15 and 8.13). Paragraph 8.15 discusses retaining actively promoted existing allocations and potential over-provision where other policies support it. Neither proposition demonstrates a site-specific need for HHH19 (14,400 sq m) or HHH35 (157,000 sq m), or justifies the environmental and infrastructure consequences of those new greenfield allocations.

3.7.2 This is particularly important in Matter 13 because both allocations add to the same Hoo Peninsula infrastructure and environmental pressures as the residential strategy. HHH19 is greenfield land close to Chattenden Wood/Lodge Hill SSSI and contains high-grade agricultural land; HHH35 is a major greenfield expansion at Kingsnorth close to the Medway Estuary and Marshes habitat network and is tied to longer-term relocation/infrastructure considerations. Policy SA14 itself anticipates HHH35 only after previously developed employment land has been occupied.

3.7.3 The large existing industrial supply weighs against new greenfield/BMV allocations adding to cumulative transport, habitat and infrastructure pressures without demonstrated site-specific need. Existing/committed and brownfield supply should take priority, with any future shortfall addressed through monitoring and Plan review.

Regulation 19 basis: TIG Main Representation, sections 4.2.2 and 4.4.2; TIG NPPF 11(b) Representation, Chapters 5 and 7-10; TIG Sites Appraisal.

Change necessary: Delete HHH19 and HHH35 from Policy SA14 and the Policies Map, retain the previously developed/committed employment pipeline and address any future evidenced shortfall through monitoring and Plan review.

4. OVERALL CONCLUSION ON THIS MATTER

4.1 Matter 13 applies the Phase 1 issues to individual allocations. TIG's central concern remains the concentration of infrastructure-dependent greenfield growth on the Hoo

Peninsula despite acknowledged environmental, transport, service and agricultural constraints and reasonable alternatives.

4.2 TIG seeks substantial reductions to SA8, scrutiny of further High Halstow growth beyond the permission at HHH26, infrastructure-led phasing, deletion of unjustified HHH19/HHH35 employment allocations and resolution of SA6's conditional basis. It does not concede that such changes can be made through Main Modifications without materially recasting the submitted strategy. Consequential amendments to the housing trajectory and related policies would also be required.

4.3 If, however, the submitted housing requirement can only be met by retaining the present Hoo/High Halstow quantum despite unresolved infrastructure or environmental constraints, or if deleting/reducing those allocations requires a fundamental redistribution and materially different spatial strategy, the Plan should not be adopted and should be withdrawn and re-prepared.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

5.1 These changes consolidate, for Matter 13, site-allocation consequences of TIG's Phase 1 case. They are without prejudice to paragraph 4.3. For this table, "EX" denotes an examination action rather than proposed policy wording.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M13-01	Policy SA6 / west of Strood	SA6 depends on the cross-boundary Green Belt proposition identified in MLP/ED7.	If the adjoining Gravesham release and coordinated delivery are not sufficiently certain, delete/amend the affected SA6 allocation and retain the Medway land in the Green Belt, with consequential housing redistribution.	Necessary for justification and effectiveness.
MM-TIG-M13-02	Policy SA8 - Hoo St Werburgh and Chattenden	The submitted circa 5,300-home quantum is not demonstrated to be the most appropriate strategy against alternatives and acknowledged constraints.	Substantially reduce SA8 and delete/reduce large strategic greenfield component sites that cannot be shown to be justified, sustainable and deliverable.	Necessary for a justified and effective site strategy.
MM-TIG-M13-03	Policy SA8 - phasing and infrastructure	Delivery depends on strategic transport, utilities, schools, health provision and environmental mitigation whose timing and funding must precede relevant effects.	Insert binding phasing/occupation triggers linked to secured infrastructure and completed ecological mitigation, with capacity reduced where those prerequisites cannot support the trajectory.	Necessary for effectiveness and deliverability.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M13-04	Policy SA9 / High Halstow	The consent for 760 homes at HHH26 does not by itself justify SA9's full 820-home strategy; HHH29 and other uncommitted growth require independent justification.	Identify HHH26 as consented for up to 760 homes, without assuming full delivery within the Plan period. Delete HHH29 and any additional uncommitted growth not independently justified; secure cumulative safeguards.	Necessary for justification and effectiveness.
MM-TIG-M13-05	Policy SA14 / HHH19 and HHH35	Additional greenfield employment allocations are not demonstrated necessary against the employment supply identified in B12 and add to Hoo Peninsula environmental/infrastructure pressures.	Delete HHH19 and HHH35 from SA14 and the Policies Map; meet need through existing/committed and brownfield supply, monitoring and review.	Necessary for justification and consistency with the evidence base.
EX-TIG-M13-06	Strategic allocation delivery evidence	Capacities and delivery periods are not transparently tied to all critical infrastructure and mitigation dependencies.	Require a consolidated site-by-site schedule identifying capacity, realistic commencement/build-out, critical infrastructure, funding, delivery body, trigger and contingency; amend allocations/trajectory where the evidence does not support delivery.	Necessary to demonstrate effective delivery.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19 E.37 / SDLP 107-118	TIG Main Representation	Spatial strategy, Hoo Peninsula allocations, alternatives, infrastructure, environment and requested changes.
TIG Reg 19 E.37	TIG NPPF 11(b) Representation	Hoo environmental/agricultural constraints, alternatives and infrastructure/deliverability.
TIG Reg 19 E.37	TIG 400m and 1km Buffer Representation	Proximity to designated habitats, urbanisation effects and mitigation.
TIG Reg 19 E.37	TIG Sites Appraisal	Hoo/High Halstow and other Peninsula site constraints and allocation objections.

A1	Submission Medway Council Local Plan 2041	Policies SA6, SA8, SA9 and SA14 and associated site-specific tables.
A3.2 / A3.3	Sustainability Appraisal Volumes 2 and 3	Strategic alternatives and site selection/appraisal.
B2	Infrastructure Delivery Plan (December 2025)	Strategic infrastructure and Hoo Peninsula requirements.
B12	Employment Land Needs Assessment (February 2025)	Industrial supply and need; paras 7.15, 8.13-8.15.
B22.1	Site Selection Topic Paper	Site-selection process.
B22.2	Hoo Peninsula SEP Topic Paper	Environmental mitigation framework.
MLP/ED6	Council's Response to Inspectors' Initial Queries	Appendix F strategic sites and infrastructure/delivery information.
MLP/ED7	Medway response to Inspectors' Green Belt Initial Questions	West-of-Strood cross-boundary dependency.
MLP/ED20	Statement of Common Ground with National Highways	Strategic road network and cumulative Local Plan impacts.
MLP/ED31	Proposed Stepped Housing Requirement and Land Supply	Post-Phase 1 trajectory and strategic-site lead-in/infrastructure rationale.
MLP/ED38	Strategic Transport Assessment - justification for stepped housing trajectory	Hoo Peninsula transport dependencies, timing, cost and phased mitigation.
MLP/ED35	Phase 2 Matters, Issues and Questions	Matter 13.
MC/23/0855	Land east of High Halstow planning permission	Issued 22 July 2026; consent for 270 full + up to 490 outline homes.

7. APPENDIX

7.1 No appendix is proposed.

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

Councillor Michael Pearce

Councillor Michael Pearce
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.*