

EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 2 - Vision, Spatial Development Strategy and Strategic Objectives

ISSUE

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.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	2.3, 2.4, 2.5, 2.6, 2.8, 2.9, 2.10, 2.11 and 2.12
Hearing session	15 September 2026 - AM session (10.00 am - 1.00 pm) and PM session (2.00 pm - 5.00 pm)
Statement date	27 August 2026
Word count	2,677 substantive words

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 2: Vision, Spatial Development Strategy and Strategic Objectives. It addresses only the Inspectors' Matters, Issues and Questions identified below and should be read alongside TIG's Regulation 19 representations listed in section 6.
- 1.2 This statement does not introduce new evidence or new arguments. Its purpose is to explain, focus and clarify points already made by TIG at Regulation 19 insofar as they answer the relevant MIQs.
- 1.3 TIG's case is principally one of soundness. A3.2 expressly assesses an "Urban Regeneration Focus"; TIG therefore does not suggest that no urban-focused reasonable alternative was assessed. The issue is whether the materially changed final strategy has been demonstrated to be an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence, and whether it is effective and consistent with the Plan's own Vision and Strategic Objectives.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

- 2.1 TIG considers that the submitted spatial strategy has not been demonstrated to be justified or effective. In particular, the evidence does not adequately demonstrate that directing approximately 30% of housing growth to the rural part of the Medway Council area, mainly the Hoo Peninsula, is the most sustainable, deliverable and appropriate distribution given the alternatives and the constraints acknowledged by the Council itself.

Soundness / legal test engaged

- 2.2 Justified; effective; consistent with national policy.

Main Modification / action sought

- 2.3 Rebalance the strategy towards suitable urban brownfield/regeneration capacity and substantially reduce strategic growth on the Hoo Peninsula to a level demonstrated to be sustainable and deliverable, with consequential amendments to Chapter 3 and Policy SA8. If this cannot be achieved without fundamentally recasting the strategy, the Plan 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. If any defect cannot be remedied by limited further work and Main Modifications without materially recasting the submitted Plan, TIG seeks non-adoption, withdrawal and re-preparation.
- 3.1 **MIQ 2.3 - Does the Vision align with other local, regional and national strategies and plans that are active in Medway?**

TIG's answer: Partly. The Vision aligns in broad terms with the adopted Hoo & Chattenden Neighbourhood Plan, but the spatial strategy intended to implement that Vision has not been demonstrated to do so consistently.

Reasoning...

- 3.1.1 The Plan records the Hoo & Chattenden Neighbourhood Plan vision as supporting sustainable growth while preserving or enhancing the parish's distinctive character and rural landscape settings (A1, para 14.9.3). It also acknowledges limited services, stretched health capacity, public transport shortcomings and high car reliance at Hoo (A1, para 14.9.2), yet Policy SA8 provides around 4,700 new homes at Hoo and 600 at Chattenden and acknowledges "significant change" (A1, para 14.9.7).
- 3.1.2 TIG's Regulation 19 representation identified tension with the neighbourhood plan's landscape, air quality and sustainable transport objectives. The issue is whether the scale of growth, rather than the aspirations in the Vision, can deliver that alignment.

Regulation 19 basis: TIG Main Representation, sections 2.1, 2.4 and 5.7; E.37 / SDLP 115.

Change necessary: Amend Policy SA8 and the spatial strategy so that the Hoo/Chattenden quantum is no greater than can be reconciled with neighbourhood plan objectives and demonstrated capacity. See MM-TIG-M2-01 and 02.

3.2 MIQ 2.4 - What are the key factors that informed and shaped the selection of the spatial development strategy over other reasonable approaches?

TIG's answer: Relevant factors were identified, but the evidence does not show transparently how they justify the final submitted distribution.

Reasoning...

- 3.2.1 A3.2 identifies Urban Regeneration Focus, Dispersed Growth and Blended Strategy as reasonable alternative spatial growth options. It states that all three could theoretically meet the development needs identified at that stage. Urban Regeneration Focus maximised urban/waterfront brownfield development, including an additional 25% densification assumption; Blended Strategy combined urban, suburban and rural growth and was preferred overall (A3.2, section 5.5).
- 3.2.2 The site package then changed materially: expected delivery reduced at Mill Fields and Chatham Docks, East of Rainham was rejected, and further land at Hoo, Lower Rainham and west of Strood was introduced/reconsidered. A3.2 says the final selection "still reflects a blended strategy" but does not provide a fresh strategic comparison showing that the revised package retains the balance which caused Option 3 to be preferred. B22.1 explains the selection process and officer judgement, but not that strategic comparison.

Regulation 19 basis: TIG Main Representation, sections 2.2, 2.5 and Chapter 5; E.37 / SDLP 107, 111 and 112.

Change necessary: Reassess and modify the final distribution against reasonable alternatives on a like-for-like basis. If the necessary redistribution fundamentally recasts the Plan, withdrawal and re-preparation is required.

3.3 MIQ 2.5 - How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?

TIG's answer: Not adequately.

Reasoning...

- 3.3.1 Chapter 3 states that around 40% of housing will come from urban regeneration, around 30% from suburban extensions and around 30% from rural areas, mainly the Hoo Peninsula (A1, paras 3.1.3-3.1.6). It refers to housing choice and possible slower delivery of brownfield sites. These are relevant considerations, but they do not explain why approximately 30% rural growth is the appropriate quantum.
- 3.3.2 B22.1 says the Blended Strategy offered the best balance and that sites were considered against the Vision, objectives and strategy. Appendix J gives substantially similar reasons for selecting major Hoo sites HHH12, HHH22/HHH31, HHH26 and HHH6: delivering the Vision/Strategic Objectives and providing opportunities for sustainable development and improved services (A3.3, Appendix J). Those conclusions do not provide a comparative explanation for the strategic scale of Hoo Peninsula growth.

Regulation 19 basis: TIG Main Representation, sections 2.2, 4 and 5; TIG Sites Appraisal; E.37 / SDLP 108-112.

Change necessary: Modify Chapter 3 so that the distribution is derived from comparative evidence rather than retaining the present 40/30/30 split as an asserted outcome. See MM-TIG-M2-01.

3.4 MIQ 2.6 - How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

TIG's answer: Partly, but not sufficiently for the Hoo Peninsula.

Reasoning...

- 3.4.1 Paragraph 3.1.8 acknowledges that much undeveloped suburban/rural land is best and most versatile agricultural land, that large areas are of international and national environmental importance, and that strategic development requires infrastructure mitigation. At Hoo, the Plan also records limited services, stretched health capacity, public transport limitations and high car reliance (A1, para 14.9.2).
- 3.4.2 Yet around 30% of housing is directed to the rural part of the Medway Council area, mainly the Hoo Peninsula. Policy SA8 seeks to manage this through masterplanning, new services, highway mitigation, potential future passenger use of the freight line and a strategic environmental programme. These measures may mitigate effects, but they do not answer the prior spatial question: why expose this proportion of growth to those constraints rather than reduce that exposure through a different distribution?

Regulation 19 basis: TIG Main Representation, sections 2.2-5; TIG NPPF 11(b) Representation, Chapters 2, 5, 7 and 8; E.37 / SDLP 108-111 and 118.

Change necessary: Reduce the rural/Hoo Peninsula component and amend Policy SA8 consequentially so that the strategy first avoids, rather than predominantly relies upon future mitigation of, the most significant constraints. See MM-TIG-M2-01 and 02.

3.5 MIQ 2.8 - How do the strategic objectives support the spatial development strategy and the policies set out in the Plan?

TIG's answer: The objectives are clear, but the submitted distribution has not been demonstrated to be their most coherent implementation.

Reasoning...

- 3.5.1 The Strategic Objectives include conserving assets of international/national importance, strengthening sustainable travel, respecting settlement identities, directing growth to the "most suitable locations", making the best use of brownfield land and reducing car dependency (A1, section 2.2).
- 3.5.2 A3.2 records Urban Regeneration Focus as the best-performing option for climate change mitigation, landscape/townscape, natural resources and transport/accessibility. Blended Strategy performed better for several other objectives, including housing and economy/employment. TIG accepts that a balance is required. Its objection is that the evidence does not demonstrate why the materially altered final Blended Strategy remains the optimum balance against the Plan's own objectives.

Regulation 19 basis: TIG Main Representation, sections 2.2 and Chapter 5; E.37 / SDLP 107, 111 and 112.

Change necessary: Rebalance the distribution so that it demonstrably implements the objectives as a whole, including brownfield regeneration, sustainable travel, environmental protection and settlement identity. See MM-TIG-M2-01.

3.6 MIQ 2.9 - How does the Plan ensure that the strategic objectives are capable of being delivered within the Plan period?

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

Reasoning...

- 3.6.1 Policy SA8 relies on a strategic masterplan, an Infrastructure Plan with phasing triggers, improved bus services, highway works, new schools and health/community facilities, and a strategic environmental management plan to be prepared and approved by the Council and Natural England. It also safeguards land for potential future passenger use of the freight line. Policy SA8 criterion 6 states that Hoo's planned growth extends beyond the Plan period into the 2040s.
- 3.6.2 B22.2 records that wider HIF funding was withdrawn in 2023 and that a replacement strategic environmental programme is being developed. It identifies an updated evidence base, review of earlier SEMS measures and a costed programme as work to be developed through partnership governance (B22.2, paras 1.3.6 and 3.1.1-3.2.2). Delivery may be possible, but important measures underpinning the Hoo strategy remain prospective.

Regulation 19 basis: TIG Main Representation, sections 2.2-2.3; TIG NPPF 11(b) Representation, Chapter 8; E.37 / SDLP 118.

Change necessary: Reduce/adjust the Hoo Peninsula quantum and phasing to the level supported by secured and deliverable infrastructure and environmental measures, with clear preconditions for dependent phases. See MM-TIG-M2-02 and 03.

3.7 MIQ 2.10 - Why is the circa 40% urban regeneration / 30% suburban / 30% rural distribution the most sustainable, deliverable and appropriate approach?

TIG's answer: It has not been demonstrated to be so. This is TIG's principal Matter 2 concern.

Reasoning...

- 3.7.1 The percentages are stated as the outcome of Chapter 3, but the evidence does not identify a transparent derivation explaining why approximately 30% rural growth, principally on the Hoo Peninsula, is optimal. The SA compares three broad options, not alternative percentage distributions. It identifies Urban Regeneration Focus as best-performing for climate mitigation, landscape/townscape, natural resources and transport/accessibility, while preferring Blended Strategy overall for its wider balance (A3.2, Table 5.6).
- 3.7.2 The final package then changed materially and additional Hoo Peninsula land was introduced. No equivalent revised strategic comparison demonstrates that the resulting 40/30/30 distribution remains the most sustainable and deliverable. Nor do the generic Appendix J site-selection reasons provide that missing comparison.
- 3.7.3 The Plan itself acknowledges BMV agricultural land, international/national environmental designations and infrastructure constraints in suburban/rural areas (A1, para 3.1.8), together with the Hoo Peninsula's existing service and transport weaknesses (para 14.9.2). A justified strategy must show why those constraints are outweighed by the advantages of placing roughly three in every ten planned homes in the rural part of the Medway Council area, mainly the Hoo Peninsula.

Regulation 19 basis: TIG Main Representation, sections 2.2-5; TIG NPPF 11(b) Representation, Chapters 5, 7 and 8; E.37 / SDLP 108-112 and 118.

Change necessary: Delete reliance on a circa 30% rural/Hoo Peninsula share unless justified by proportionate comparative evidence. Maximise suitable urban brownfield/regeneration opportunities and reduce Hoo Peninsula growth accordingly. See MM-TIG-M2-01 and 02.

3.8 MIQ 2.11 - In what way were reasonable alternative development strategies considered and assessed during the plan-making process?

TIG's answer: Reasonable alternatives were considered, but the final submitted strategy has not been adequately demonstrated against them.

Reasoning...

- 3.8.1 TIG clarifies its Regulation 19 case. A3.2 did assess an Urban Regeneration Focus. Option 1 maximised urban/waterfront brownfield development through an additional 25% densification assumption, with limited greenfield development and a partial Hoo component. It is materially closer to TIG's Regulation 19 preference for maximising urban growth and minimising rural harm, although not identical to it.
- 3.8.2 The soundness concern remains because the comparative assessment relates to the options as then defined. A3.2 later records significant changes to the sites comprising the selected strategy, including further Hoo Peninsula growth, and states only that the final selection "still reflects a blended strategy". That does not demonstrate that the revised strategy is an appropriate strategy when compared with alternatives on a consistent basis. MLP/ED6 Q5 confirms that the Council relies on the SA documents and consultation process for its reasonable-alternatives explanation.

Regulation 19 basis: TIG Main Representation, sections 2.1-2.2 and Chapter 5; TIG NPPF 11(b) Representation, Chapter 7; E.37 / SDLP 107, 111 and 112.

Change necessary: Reassess the final strategy against reasonable alternatives and modify the Plan to an appropriate strategy demonstrated by the evidence. If that requires a fundamental redistribution beyond proper Main Modification, withdraw and re-prepare the Plan.

3.9 MIQ 2.12 - How does the spatial development strategy address the requirements of different parts of Medway such as the Hoo Peninsula as well as the more urban areas?

TIG's answer: The Plan differentiates between areas, but the Hoo strategy is not shown to respond appropriately to the Hoo Peninsula's particular constraints and rural character.

Reasoning...

- 3.9.1 TIG supports regeneration of suitable brownfield and urban sites, including in Strood and the wider urban area. Its objection is not to meeting the Medway Council area's needs or to all development on the Hoo Peninsula. It is to the scale and concentration proposed where rural/estuarine character, environmental sensitivity, agricultural quality, service limitations and transport constraints are expressly recognised.
- 3.9.2 The submitted strategy largely treats those constraints as matters to be mitigated through growth-funded infrastructure, masterplanning and environmental programmes. TIG's Regulation 19 case is that the strategy should first reduce avoidable exposure to those constraints by directing a greater proportion of development to suitable urban brownfield/regeneration and less constrained locations.

Regulation 19 basis: TIG Main Representation, sections 3-5; TIG NPPF 11(b) Representation, Chapters 2, 5, 7 and 8; TIG Sites Appraisal; E.37 / SDLP 108-111, 115 and 118.

Change necessary: Amend the spatial distribution and consequential Hoo Peninsula policies/allocations as set out in MM-TIG-M2-01 and 02.

4. OVERALL CONCLUSION ON THIS MATTER

- 4.1 TIG considers that the submitted spatial strategy has not been demonstrated to be justified or effective. The Council has identified relevant constraints, assessed broad reasonable alternatives and articulated a preference for a Blended Strategy, but the

evidence does not adequately demonstrate that the materially changed final strategy - particularly its approximately 30% rural component mainly on the Hoo Peninsula - is an appropriate, sustainable and deliverable strategy.

- 4.2 TIG's primary position is that the identified defects should be remedied through Main Modifications that substantially reduce strategic Hoo Peninsula growth and give greater weight to suitable urban brownfield/regeneration capacity, provided this can be achieved without materially recasting the submitted strategy.
- 4.3 If, however, soundness requires a material redistribution amounting to a fundamentally recast spatial strategy, TIG considers that the Plan should not be adopted in its present form and should be withdrawn and re-prepared.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

- 5.1 These changes are without prejudice to TIG's position at paragraphs 4.2-4.3 and apply only if the defects can be remedied without materially recasting the submitted Plan.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M2-01	Chapter 3, paras 3.1.3-3.1.8 and Spatial Development Strategy	The 40/30/30 distribution, including circa 30% rural growth mainly on the Hoo Peninsula, is not adequately justified against the final alternatives and acknowledged constraints.	Amend the distribution to maximise suitable urban brownfield/regeneration opportunities and substantially reduce the rural/Hoo Peninsula share to the level demonstrated by refreshed comparative assessment to be most sustainable and deliverable, with consequential changes to Chapter 3 and strategic policies.	Justified and effective.
MM-TIG-M2-02	Policy SA8 Hoo St Werburgh and Chattenden, Objective 1 and site quantum	The policy embeds approximately 5,300 homes before the overall Hoo Peninsula quantum is shown to form part of an appropriate strategic outcome.	Reduce the housing quantum and consequential strategic allocations to the scale resulting from MM-TIG-M2-01; retain only growth demonstrated compatible with environmental capacity, settlement identity and deliverable infrastructure.	Justified, effective and consistent with the Strategic Objectives.
MM-TIG-M2-03	Policy SA8 criteria 6, 12-20	Delivery depends partly on prospective infrastructure/environmental measures.	Require that no dependent phase proceeds until necessary infrastructure and strategic environmental	Effective.

			measures are defined, funded/secured and capable of timely delivery, with review triggers for delay.	
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6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19 E.37 / SDLP 107-112, 115 and 118	TIG Main Representation	Soundness, reasonable alternatives, spatial strategy, Hoo Peninsula allocations, neighbourhood plan and infrastructure.
TIG Reg 19 E.37	TIG NPPF 11(b) Representation	Environmental/agricultural constraints, alternatives and deliverability.
TIG Reg 19 E.37	TIG Sites Appraisal	Hoo Peninsula site constraints and allocation objections.
A1	Submission Medway Council Local Plan 2041	Sections 2.1, 2.2, 3.1, Spatial Development Strategy, 14.9 and Policy SA8.
A3.2	Sustainability Appraisal Volume 2 of 3 - Regulation 19 SA	Section 5.5 and Table 5.6.
A3.3	Sustainability Appraisal Volume 3 of 3 - Appendices	Appendix J.
B22.1	Site Selection Topic Paper	Sections 2.1-2.5.
B22.2	Hoo Peninsula Strategic Environmental Programme Topic Paper	Sections 1.3, 3.1 and 3.2.
MLP/ED6	Council's Response to Inspectors' Initial Queries	Question 5.
MLP/ED15	Phase 1 Matters, Issues and Questions	Matter 2, questions 2.3-2.12.

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**

27 August 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.*