

## EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

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# HEARING STATEMENT

## THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

### MATTER

**Matter 3 - Meeting Housing Needs**

### ISSUE

**Whether the policies and designations relating to meeting housing needs in the Plan are clear, positively prepared, justified, effective and consistent with national policy. Whether the housing growth identified in the Plan is justified and deliverable. Whether the Plan and its relevant policies provide an ongoing five-year supply of deliverable housing sites. Whether the Plan and its policies provide for an adequate and appropriate mix of housing and sites. Whether delivery mechanisms to meet housing needs are clear, justified and effective.**

|                        |                                                                                           |
|------------------------|-------------------------------------------------------------------------------------------|
| <b>Representor</b>     | The Independent Group (TIG) on Medway Council                                             |
| <b>Representor ID</b>  | E.37                                                                                      |
| <b>Relevant MIQs</b>   | 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10 and 3.11                                |
| <b>Hearing session</b> | 16 September 2026 - AM session (10.00 am - 1.00 pm)<br>and PM session (2.00 pm - 5.00 pm) |
| <b>Statement date</b>  | 27 August 2026                                                                            |
| <b>Word count</b>      | 2,984 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 3 - Meeting Housing Needs. It addresses only MIQs 3.1-3.11 and should be read alongside TIG's Regulation 19 representations listed in section 6.
- 1.2 This statement does not introduce new objections. It focuses and clarifies TIG's existing concerns concerning the housing requirement, trajectory, deliverability, infrastructure dependency and the scale of housing growth proposed on the Hoo Peninsula. Later examination and published monitoring material is used only insofar as it bears upon those issues.
- 1.3 Matter 2 addresses the spatial distribution. Matter 3 concerns whether the housing requirement and planned supply are clear and deliverable. TIG does not consider further rural/Hoo Peninsula greenfield allocations an appropriate response to delivery risk.

## **2. TIG'S POSITION AT A GLANCE**

### **Overall answer to the Matter / Issue**

- 2.1 TIG considers that the submitted Plan does not yet provide a sufficiently clear or robust housing requirement, trajectory and delivery framework. A1 states 1,636 homes per annum and 24,540 homes over 15 years to 2041, whereas B22.5 later records 26,176 across a trajectory that includes pre-adoption Year 0, introduces a stepped post-adoption requirement and contains the consolidated trajectory outside the Plan.
- 2.2 B22.5 also confirms material delivery risk: at its base date, two-thirds of allocated-site yield was on 12 strategic sites of at least 500 homes without planning permission; 36 allocations are expected to start after the first five years because of highway, flood-defence and water-network dependencies; and the overall surplus is only 150 dwellings.

### **Soundness / legal test engaged**

- 2.3 Positively prepared; justified; effective; consistent with national policy.

### **Main Modification / action sought**

- 2.4 Modify the Plan to state an unambiguous housing requirement, incorporate the planned sources of supply and trajectory, justify the stepped requirement and strategic-site assumptions, and provide clear monitoring/intervention mechanisms. Hoo Peninsula phasing must reflect demonstrably deliverable infrastructure and environmental prerequisites.
- 2.5 If a sound housing strategy requires a fundamental redistribution or substantial new allocations amounting to a materially different strategy, the Plan should be withdrawn and re-prepared. Further rural/Hoo Peninsula allocations are not an appropriate cure for delivery risk.

## **3. RESPONSES TO THE INSPECTORS' MIQs**

- 3.0 The changes below are without prejudice to TIG's position at paragraphs 4.2-4.3. If the housing strategy cannot be made sound through limited Main Modifications without materially recasting the Plan, TIG seeks non-adoption, withdrawal and re-preparation.

### 3.1 MIQ 3.1 - Assessment of the housing requirement

**TIG's answer:** The Standard Method approach is identified, but the evidential trail to the current 1,636 figure should be reconciled.

#### Reasoning...

- 3.1.1 B10, the February 2025 Local Housing Needs Assessment, applies the December 2024 Standard Method using the then latest dwelling-stock and affordability inputs and calculates 1,594 dwellings per annum (paras 4.6-4.13). A1 and B22.5 state 1,636. The difference may reflect updated affordability inputs, but B10 remains the LHNA evidence containing the 1,594 calculation. TIG asks the Council to identify the updated inputs/calculation supporting 1,636.
- 3.1.2 TIG does not advance an alternative Local Housing Need calculation. Its Regulation 19 case accepted housing need as the starting point but challenged whether the scale and distribution proposed, particularly on the Hoo Peninsula, were sustainable and deliverable given identified constraints. The present point is therefore evidential clarity and the translation of the current Standard Method figure into the Plan's requirement and supply strategy.

**Regulation 19 basis:** TIG NPPF 11(b) Representation, Chapters 1 and 8; TIG Main Representation, sections 2.3, 4.4 and 5.8.

**Change necessary:** Identify and reconcile the evidence supporting the current Standard Method figure, then state the resulting Plan requirement clearly and explain how it translates into a deliverable requirement.

### 3.2 MIQ 3.2 - Is the housing requirement realistic and deliverable?

**TIG's answer:** Not yet demonstrated.

#### Reasoning...

- 3.2.1 B22.5 records completions below the then applicable Local Housing Need in each of the five years shown, including 634 completions in 2024/25 against 1,636. It therefore proposes a stepped requirement.
- 3.2.2 Future delivery is highly dependent on strategic sites. B22.5 paragraph 3.2.6 says that, at its base date, two-thirds of allocated-site yield was on 12 sites of at least 500 homes without planning permission. Paragraph 5.2.4 moves 36 allocations beyond the first five years because of highway mitigation, flood defences and possible water-supply enhancements.
- 3.2.3 That directly bears on TIG's Regulation 19 concern that major Hoo Peninsula delivery rates were optimistic given infrastructure and mitigation dependencies. B2 now confirms Hoo's limited service base, transport constraints and environmental sensitivity, and the need for significant upgrades.

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

**Change necessary:** Demonstrate the requirement against a realistic, site-specific trajectory and amend quantum/phasing where delivery cannot be demonstrated.

### 3.3 MIQ 3.3 - Minimum requirement, flexibility and contingency

**TIG's answer:** The figures and contingency are not sufficiently clear.

#### Reasoning...

- 3.3.1 A1 states 1,636 homes per annum and 24,540 homes over 15 years to 2041. B22.5 Table 2 later records a 26,176 housing requirement across its trajectory, which includes pre-adoption Year 0 (2025/26), and applies 1,636 per annum in Years 1-5, 1,963 in Years 6-10 and 1,309 in Years 11-15. The submitted Plan contains none of that stepped post-adoption schedule.
- 3.3.2 B22.5 identifies only 150 dwellings above its 26,176 requirement (about 0.6%). More fundamentally, paragraph 5.3.2 moves the 20% five-year-supply buffer to Years 6-10 and subtracts it from Years 11-15. National guidance says the applicable buffer should be added to the first five-year requirement, bringing sites forward from later in the plan period. TIG therefore questions B22.5's approach.

**Regulation 19 basis:** TIG Main Representation, section 2.3 and section 4.4.1; TIG NPPF 11(b) Representation, Chapter 8.

**Change necessary:** Define the minimum requirement and stepped schedule in the Plan and demonstrate a policy-compliant five-year supply with genuine contingency for non-delivery.

### 3.4 MIQ 3.4 - Requirement figure at adoption and buffer

**TIG's answer:** Explicit confirmation and Main Modification are required.

#### Reasoning...

- 3.4.1 The submitted Plan states 24,540 homes over 15 years. B22.5 records 26,176 including pre-adoption Year 0 and stepped post-adoption requirements. MLP/ED6 Q8 acknowledges that adoption is unlikely during 2026 and the Plan to 2041 may provide only about 14 years from adoption. It also gives 2,540 post-2041 homes from listed sites, while B22.5 paragraph 5.6.2 gives 4,343. The operative requirement, Year 0 and post-2041 figures therefore require a clear, reconciled explanation.
- 3.4.2 The 2025 Housing Delivery Test, published 17 August 2026, supersedes the 2024 measurement and records Medway Council at 60%, so a 20% buffer applies. Applied to B22.5's Years 1-5 requirement of 8,180, this gives 9,816. Against supply of 8,532, that is about 4.35 years, not the 5.22 shown in Table 6. The Council should explain how five-year supply is demonstrated.

**Regulation 19 basis:** TIG Main Representation, section 2.3; TIG NPPF 11(b) Representation, Chapter 8.

**Change necessary:** State the requirement at adoption, treatment of Year 0 and stepped annual requirements; apply and explain the applicable buffer; and reconcile the post-2041 figures.

### 3.5 MIQ 3.5 - Absence of a housing requirement policy

**TIG's answer:** A strategic housing requirement and supply policy is necessary.

#### Reasoning...

3.5.1 The submitted Plan contains narrative figures at paragraphs 1.3.5-1.3.7 and 6.1.2, but these no longer match B22.5's updated trajectory. MLP/ED6 Q19 accepts that the trajectory should be introduced by Main Modification.

3.5.2 TIG considers the modification should state the minimum requirement, principal supply components and broad distribution, with the trajectory linked to monitoring and review, rather than merely inserting a chart.

**Regulation 19 basis:** TIG Main Representation, Chapters 2, 4 and 5; E.37 / SDLP 108-112 and 118.

**Change necessary:** Insert an operative strategic housing requirement/supply policy and update the supporting text.

### 3.6 MIQ 3.6 - Planned-for sources of housing supply

**TIG's answer:** Not clearly in the submitted Plan.

#### Reasoning...

3.6.1 A1 paragraph 1.3.6 identifies 1,762 pipeline homes, 21,194 from allocations and 1,584 windfalls. B22.5 updates that position: 2,489 on large sites under construction, 238 on large permitted but unallocated sites, 190 on small permitted sites after lapse, 1,703 windfalls and 21,706 from allocations within the plan period.

3.6.2 The updated figures may be explainable, but the Plan should itself state what supply it is planning for. Reliance on an external Topic Paper for the operative position is neither sufficiently clear nor effective.

**Regulation 19 basis:** TIG Main Representation, section 2.3, section 4.4.1 and Chapter 5.

**Change necessary:** Put the current supply components in the Plan and keep them consistent with the trajectory and site policies.

### 3.7 MIQ 3.7 - Housing trajectory outside the Plan

**TIG's answer:** The trajectory should be incorporated into the Plan.

#### Reasoning...

3.7.1 A1 paragraph 14.1.4 refers to a housing trajectory, but no consolidated trajectory is included. B22.5 contains it instead. MLP/ED6 Q19 records that the Council now wishes to introduce it by Main Modification.

- 3.7.2 TIG supports that action in principle. The trajectory is central to five-year supply and strategic-site effectiveness and should be visible, internally consistent and capable of monitoring against defined milestones.

**Regulation 19 basis:** TIG Main Representation, section 2.3 and section 4.4.1.

**Change necessary:** Incorporate the current trajectory into the Plan with consequential policy and monitoring changes.

### **3.8 MIQ 3.8 - Deliverability of the trajectory, including strategic sites**

**TIG's answer:** Not sufficiently demonstrated, particularly for infrastructure-dependent strategic sites.

#### **Reasoning...**

- 3.8.1 B1 applied median Lichfields lead-in/build-out benchmarks to unconsented sites and described them as cautious. B22.5 now applies upper-quartile build-out rates to eight sites and says timely infrastructure should stimulate higher delivery. That requires site-specific justification because the same evidence identifies infrastructure as a reason for delaying 36 allocations.
- 3.8.2 At Hoo, the trajectory assumes no first-five-year completions from HHH12 (1,800 homes) or HHH22/HHH31 at Roper's Lane (3,200 total capacity), followed by 188 dwellings per annum on each from Year 6. HHH22/HHH31 delivers only 1,880 within the plan period, with 1,320 post-2041. HHH6 delivers only 83 of 550 homes in the first five years.
- 3.8.3 MLP/ED6 Appendix F records for HHH12 an application date still to be confirmed, estimated £3.15 million flood-defence works, a critical sewer rising main and limited water-network capacity. For HHH22/HHH31 the application date is also to be confirmed, flood-defence works are estimated at £4.4 million, and water-network reinforcement may be needed. Both depend on Hoo-wide masterplanning/infrastructure arrangements.
- 3.8.4 The issue is not whether these sites can ever deliver, but whether a back-loaded sequence of very large sites can accelerate to the assumed rates after multiple prerequisites are satisfied. That requires stronger evidence and contingency than a 150-home overall surplus.

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

**Change necessary:** Use evidence-based rates linked to secured infrastructure; do not rely on upper-quartile rates without site-specific justification; reduce Hoo Peninsula quantum where delivery cannot be demonstrated.

### 3.9 MIQ 3.9 - Small sites, SMEs and windfalls

**TIG's answer:** The methodology is explained, but these sources do not provide separate contingency for strategic-site failure.

**Reasoning...**

- 3.9.1 B22.5 derives 131 windfall dwellings per annum from ten-year averages, applied from 2028/29, and applies a 17% lapse rate to small permitted sites. A14 proposes monitoring small-site permissions/completions and refers to the national expectation for at least 10% of the requirement on sites no larger than one hectare.
- 3.9.2 TIG does not make the precise windfall assumption its principal objection. The point is that windfalls and small sites are already included in the Council's 150-home surplus and cannot also operate as a separate reserve if strategic allocations underperform.

**Regulation 19 basis:** TIG Main Representation, Chapter 5 and section 5.8.

**Change necessary:** Retain robust small-site/windfall monitoring and avoid treating these sources as additional contingency once counted in supply.

### 3.10 MIQ 3.10 - Constraints in site capacities and delivery timings

**TIG's answer:** Several constraints are now reflected, but the exercise confirms rather than removes the deliverability concern.

**Reasoning...**

- 3.10.1 B22.5 delays 36 allocations beyond the first five years for highway mitigation, flood defences and possible water-supply enhancements. B2 records that Hoo growth requires significant transport, education, health, community and environmental infrastructure, with phasing/triggers to be established through a Hoo Peninsula Infrastructure Plan.
- 3.10.2 B2 also says strategic transport mitigation is likely to require external funding in addition to developer contributions, while Southern Water says site-specific network reinforcement may be needed and cannot be fully designed until connection applications are made. These remain material dependencies.
- 3.10.3 Site capacities, start dates and annual rates must therefore be aligned with the actual programme for unlocking constraints. Identification of mitigation in principle does not itself demonstrate delivery at a particular time or rate.

**Regulation 19 basis:** TIG Main Representation, section 2.3 and Chapter 4; TIG NPPF 11(b) Representation, Chapter 8; TIG Sites Appraisal.

**Change necessary:** Link phasing to funded/secured infrastructure and environmental prerequisites, with review points where prerequisites are delayed.

### 3.11 MIQ 3.11 - Monitoring and response to underperformance

**TIG's answer:** Monitoring indicators exist, but the intervention framework is not sufficiently clear.

#### Reasoning...

- 3.11.1 A14 proposes monitoring allocation progress, permissions, construction and net annual completions. B1 refers to annual monitoring and the Housing Delivery Test Action Plan; B22.5 refers to annual review of the trajectory and Brownfield Land Register.
- 3.11.2 MLP/ED6 Q11 confirms that the Council wishes A14 to be introduced into the Plan by Main Modification. That is appropriate in principle, but A14 does not itself identify a quantitative housing-delivery trigger, an explicit five-year-supply trigger or a defined route from monitoring to remedial action or early Plan review.
- 3.11.3 Given the limited surplus and reliance on strategic sites, the Plan should require annual comparison against the trajectory, publication of five-year supply, identification of delayed sites/infrastructure, and defined triggers for corrective action and, where necessary, early review. Corrective action should prioritise suitable urban brownfield/regeneration opportunities, not further Hoo Peninsula greenfield growth.

**Regulation 19 basis:** TIG Main Representation, section 2.3, Chapter 5 and section 5.8; TIG NPPF 11(b) Representation, Chapter 8.

**Change necessary:** Add explicit housing-delivery indicators, review triggers and intervention mechanisms to the Plan/Monitoring Framework.

## 4. OVERALL CONCLUSION ON THIS MATTER

- 4.1 TIG does not dispute the Council's 1,636 dwellings per annum Standard Method figure. Its concern is whether the Plan translates it into a clear, justified and deliverable requirement and supply strategy. A1 states 24,540 homes over 15 years; B22.5 records 26,176 including Year 0, a stepped requirement and only a 150-dwelling surplus. Its buffer treatment also appears to leave less than five years' supply in Years 1-5, while delivery remains heavily dependent on large infrastructure-dependent strategic sites.
- 4.2 TIG's primary position is that the Plan cannot presently be found sound on these Matter 3 issues. If the deficiencies can be remedied through limited Main Modifications that clarify the requirement/supply, incorporate a robust trajectory, strengthen monitoring and adjust constrained strategic-site phasing/quantum without materially recasting the strategy, TIG accepts that route may be available.
- 4.3 If a realistic trajectory instead requires fundamental redistribution, substantial new allocations or other changes amounting to a materially different spatial strategy, the Plan should not be adopted and should be withdrawn and re-prepared. TIG specifically rejects curing delivery risk by adding further rural/Hoo Peninsula greenfield allocations.

## 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                                            |
|---------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| <b>MM-TIG-M3-01</b> | Chapter 6 / strategic housing requirement     | A1 states 24,540 homes over 15 years; B22.5 later records 26,176 across a trajectory including pre-adoption Year 0 and a stepped post-adoption requirement outside the Plan. | Insert an operative policy confirming the minimum requirement at adoption, treatment of Year 0, the stepped annual schedule, principal supply components and treatment of the buffer.                                                        | Clear, justified and effective.                          |
| <b>MM-TIG-M3-02</b> | Housing trajectory / site allocations         | The consolidated trajectory is outside the Plan and later evidence materially changes site timing.                                                                           | Incorporate the current trajectory and align site-policy yields, start dates and phasing with the deliverability evidence.                                                                                                                   | Effective and necessary for an ongoing five-year supply. |
| <b>MM-TIG-M3-03</b> | Policy SA8 and Hoo Peninsula site allocations | Major Hoo sites are back-loaded and depend on flood, highway, water and masterplanning prerequisites, with upper-quartile rates used for some sites.                         | Phase and, where necessary to reflect demonstrated delivery within the Plan period, reduce the Hoo Peninsula quantum to the level supported by secured infrastructure and site-specific delivery evidence.                                   | Justified and effective.                                 |
| <b>MM-TIG-M3-04</b> | A14 Monitoring Framework / housing delivery   | Monitoring records outputs but does not set clear quantitative delivery/supply triggers and responses.                                                                       | Add annual trajectory and five-year-supply monitoring, triggers for delayed sites/infrastructure, corrective action and early review. Prioritise suitable urban brownfield/regeneration rather than further Hoo Peninsula greenfield growth. | Effective and resilient.                                 |

## 6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

| Reference                                  | Document                                  | Where relevant                                                    |
|--------------------------------------------|-------------------------------------------|-------------------------------------------------------------------|
| <b>TIG Reg 19 E.37 / SDLP 108-112, 118</b> | TIG Main Representation                   | Housing trajectory/deliverability; Hoo allocations; alternatives. |
| <b>TIG Reg 19 E.37</b>                     | TIG NPPF 11(b) Representation             | Housing need; Hoo constraints; infrastructure/deliverability.     |
| <b>TIG Reg 19 E.37</b>                     | TIG Sites Appraisal                       | Hoo site constraints and allocation objections.                   |
| <b>A1</b>                                  | Submission Medway Council Local Plan 2041 | paras 1.3.5-1.3.7, 6.1.2, 14.1.4; Policy SA8.                     |
| <b>A14</b>                                 | Monitoring Framework                      | Housing monitoring indicators.                                    |

|                        |                                                                                                 |                                                            |
|------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| <b>B1</b>              | Land Availability Assessment                                                                    | sections 4.2-4.5 and 5.                                    |
| <b>B2</b>              | Infrastructure Delivery Plan (December 2025)                                                    | sections 2.7 and 2.9; infrastructure.                      |
| <b>B10</b>             | Local Housing Needs Assessment (February 2025)                                                  | Chapter 4, especially paras 4.6-4.13.                      |
| <b>B22.5</b>           | Housing Delivery Topic Paper                                                                    | sections 2-5; Appendix trajectory.                         |
| <b>MLP/ED6</b>         | Council's Response to Inspectors' Initial Queries                                               | Q8, Q11, Q18-Q19; Appendix F.                              |
| <b>MLP/ED15</b>        | Phase 1 Matters, Issues and Questions                                                           | Matter 3, questions 3.1-3.11.                              |
| <b>NPPG / HDT 2025</b> | Planning Practice Guidance: Housing Supply and Delivery; Housing Delivery Test 2025 measurement | Five-year-supply buffer; latest published delivery result. |

## 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.*