

EXAMINATION OF THE MEDWAY COUNCIL LOCAL PLAN 2041

HEARING STATEMENT

THE INDEPENDENT GROUP (TIG) ON MEDWAY COUNCIL

MATTER

Matter 8 - Retail, Town Centres and Leisure

ISSUE

Whether the Plan and its policies relating to retail, town centres and leisure are clear, positively prepared, justified, effective and consistent with national policy.

Representor	The Independent Group (TIG) on Medway Council
Representor ID	E.37
Relevant MIQs	8.4, 8.54, 8.55, 8.57, 8.58, 8.59 and 8.69
Hearing session	24 September 2026 - AM session (9.30 am - 1.00 pm) and PM session (2.00 pm - 5.00 pm)
Statement date	27 August 2026
Word count	2,527 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 8 - Retail, Town Centres and Leisure. TIG participates only insofar as Matter 8 concerns Policy S22 and the Hoo Peninsula. It should be read alongside TIG's Regulation 19 representations listed in section 6.
- 1.2 TIG did not advance a freestanding retail-planning objection to Policy S22 at Regulation 19 and does not seek to introduce one now. This statement addresses the Inspectors' questions only where the proposed Hoo centres are consequential upon TIG's existing objections to the scale, distribution and deliverability of strategic growth on the Hoo Peninsula.
- 1.3 If strategic growth occurs, appropriate local shops, services and community facilities will be necessary. The issue for TIG is whether the number, scale, role, location and phasing of the centres in Policy S22 remain justified if the underlying Hoo Peninsula growth changes through the examination.

2. TIG'S POSITION AT A GLANCE

Overall answer to the Matter / Issue

- 2.1 TIG considers that the evidence supports the principle of planned local centre provision where strategic Hoo growth is retained, but does not justify treating the submitted three-centre configuration as independent of that growth. B13 derives its recommendations from a then-current scenario of up to about 5,500 new homes, possibly 7,000 in the longer term, and expressly acknowledges that the areas of growth had not yet been set.

Soundness / legal test engaged

- 2.2 Justified; effective; consistent with national policy.

Main Modification / action sought

- 2.3 Policy S22 should be aligned with whatever scale and distribution of Hoo Peninsula development is ultimately found sound. It should identify the intended place of each new centre in the hierarchy, explain the evidence for the preferred main-centre location, protect the existing Hoo village centre and clarify the impact-assessment requirement. If the Hoo growth on which S22 depends is materially reduced or redistributed, the number, scale and phasing of centres should be reviewed accordingly.

3. RESPONSES TO THE INSPECTORS' MIQs

- 3.0 The responses below do not create a separate TIG objection to retail provision. They explain the consequences for Policy S22 of TIG's Regulation 19 case that major Hoo Peninsula growth should be removed or significantly reduced and redistributed towards sustainable urban and suburban locations.

3.1 MIQ 8.4 - Does the Medway Retail and Town Centres Study (B13) cover Hoo?

TIG's answer: Yes.

Reasoning...

- 3.1.1 B13 contains a specific assessment of Hoo / Chattenden / High Halstow at paragraphs 5.49-5.56. It records potential major development of up to about 5,500 homes, possibly 7,000 in the longer term.
- 3.1.2 On that basis B13 estimates capacity of about 1,300 sq m net convenience floorspace and concludes, after qualitative considerations, that a foodstore of around 2,000 sq m gross remains appropriate, alongside smaller convenience provision.
- 3.1.3 The qualification is important. B13 states that the areas of growth had not yet been set and recommends a criteria-based approach because the scale and location of development could change. It therefore covers Hoo, but does not provide an unconditional justification for the same number and scale of centres under every examination outcome.

Regulation 19 basis: TIG Main Representation, Chapter 5, particularly sections 5.3-5.9; E.37 / SDLP 110-112 and 118.

Change necessary: Ensure Policy S22 is expressly linked to the final scale and distribution of Hoo Peninsula growth found sound. See MM-TIG-M8-01.

3.2 MIQ 8.54 - Why is the creation of a total of three new centres on the Hoo Peninsula justified?

TIG's answer: B13 supports a network of modest centres on the growth scenario it assessed, but the justification for exactly three is conditional upon the final development distribution.

Reasoning...

- 3.2.1 B13 paragraph 5.54 identifies an opportunity for a network of modest-sized centres because of the scale of potential residential growth. It identifies three broad locations - east of Hoo, west of Hoo and adjacent to Chattenden - and recommends that one should be capable of accommodating a medium-sized foodstore.
- 3.2.2 The same passage states that the areas of growth had not yet been set and recommends criteria for provision as the strategy evolves. The evidence therefore does not establish that exactly three centres remain necessary if a material part of the assumed growth is removed, reduced or redistributed.
- 3.2.3 TIG's Regulation 19 case seeks removal or significant reduction of strategic Hoo Peninsula allocations and greater use of sustainable urban and suburban alternatives. Policy S22 should therefore be consequential upon the examination's conclusions on that strategic growth, rather than operate as a separate reason for retaining it.
- 3.2.4 TIG accepts that retained growth must be served by suitable facilities. It does not accept that a retail strategy derived from a large growth scenario can itself justify that growth or fix the same centre configuration after the growth scenario has changed.

Regulation 19 basis: TIG Main Representation, sections 5.3-5.9; E.37 / SDLP 110-112, 115 and 118.

Change necessary: Make the three-centre requirement subject to the scale and distribution of development ultimately found sound, with proportionate reassessment if that distribution changes. See MM-TIG-M8-01 and EX-TIG-M8-04.

3.3 MIQ 8.55 - Why is the preferred location for the main neighbourhood centre to the east of Hoo?

TIG's answer: B13 supports a close association with Hoo, but does not appear to identify east of Hoo as the only or necessarily preferred location for the principal new facility.

Reasoning...

- 3.3.1 B13 recommends that the main new provision should have a close association with Hoo so it can serve existing residents and planned growth. It identifies east of Hoo, west of Hoo and adjacent to Chattenden as suitable broad locations and states that one should be able to accommodate a medium-sized foodstore.
- 3.3.2 B13 also places accessibility at the heart of location choice and notes that, based on the then-current distribution of growth, areas south of the A228 were preferable. TIG has not identified in B13 a comparative conclusion that east of Hoo specifically must be the main centre.
- 3.3.3 If the Council relies on later masterplanning or site-distribution evidence for that preference, the examination evidence should make the basis clear. The preference should also remain capable of adjustment if the final pattern of strategic growth changes.

Regulation 19 basis: TIG Main Representation, Chapter 5; E.37 / SDLP 110-112 and 118.

Change necessary: Explain and, if necessary, modify the east-of-Hoo preference so that it follows from the final development distribution and accessibility evidence. See MM-TIG-M8-02.

3.4 MIQ 8.57 - Why would an impact assessment be required when Policy S22 confirms that new centres are required?

TIG's answer: An impact assessment can still have a legitimate role, but the policy should clarify what it is intended to test.

Reasoning...

- 3.4.1 B13 recommends planned provision while requiring new centres to complement the existing Hoo local centre and avoid detriment to defined centres. Paragraph 5.55 also recommends that Policy S22 set out the assessment work required of planning applications.
- 3.4.2 There is therefore no necessary contradiction between identifying a need for appropriately scaled local provision and testing the detailed scale and effects of a particular proposal. The Plan should distinguish between the plan-level decision that provision is required and any development-management impact test applied to a detailed scheme.

- 3.4.3 This matters because an application may be materially larger, differently located or differently composed than the provision assumed when the strategy was prepared. The existing Hoo village centre should remain a clear receptor for that assessment.

Regulation 19 basis: Consequential to TIG's Regulation 19 spatial-strategy and Hoo Peninsula objections; E.37 / SDLP 110-112 and 118.

Change necessary: Clarify the trigger, purpose and relationship of the S22 impact requirement to Policy T17 and to the existing Hoo centre. See MM-TIG-M8-03.

3.5 MIQ 8.58 - Where would the new main centre and two neighbourhood centres be found in Medway's hierarchy?

TIG's answer: This should be expressly stated.

Reasoning...

- 3.5.1 B13 states that new Hoo provision should meet day-to-day needs, be appropriate to its context and perform the role of a local centre in the wider hierarchy without harming existing defined centres. Policy S16 identifies Principal Town Centre, District Centres and Local/Rural Centres, while separately referring to shopping parades/neighbourhood centres in strategic-growth areas.
- 3.5.2 Policy S22 then refers to a new "main centre" and two "neighbourhood centres". The intended status of the main centre is therefore not as clear as it could be. TIG does not seek a higher-order centre on the Hoo Peninsula; B13 points towards modest provision serving local needs.
- 3.5.3 The phrase "attractive location" should likewise be clarified by objective criteria such as accessibility, placemaking, co-location and deliverability, rather than being capable of supporting a commercial scale beyond that required by the population to be served.

Regulation 19 basis: TIG Main Representation, sections 5.3 and 5.7; E.37 / SDLP 111 and 115.

Change necessary: Specify the intended hierarchy position and role of each S22 centre and clarify the location criteria. See MM-TIG-M8-02.

3.6 MIQ 8.59 - How has B13 informed Policy S22, particularly the effect on the existing Hoo village centre and centres in the hierarchy?

TIG's answer: B13 addresses the issue in principle, but its conclusion remains dependent upon scale, function and the final growth scenario.

Reasoning...

- 3.6.1 B13 records the existing low level of retail provision on the Peninsula and leakage of trips to places such as Strood. It supports additional local provision as part of a more sustainable settlement pattern where strategic growth occurs.
- 3.6.2 At the same time, B13 requires new provision to complement the existing Hoo local centre, be appropriate in scale and function and avoid detriment to existing defined

centres. Policy S22 reflects that principle by stating that new centres should not undermine the existing village centre.

- 3.6.3 B13 does not provide an unconditional impact conclusion for any eventual quantity of floorspace in three final centres. Its recommendation was based on the development scenario then before it and expressly anticipated further refinement. Policy S22 therefore needs enough flexibility to reduce or reshape provision if the development quantum changes and enough control to protect the existing centre from over-scaled provision.

Regulation 19 basis: TIG Main Representation, sections 5.3-5.9; E.37 / SDLP 110-112, 115 and 118.

Change necessary: Retain and strengthen the safeguard for the existing Hoo village centre and tie the scale of new provision to evidenced local need arising from the final growth strategy. See MM-TIG-M8-01 and 03.

3.7 MIQ 8.69 - How will Policy DM12 be effective as regards the Hoo Peninsula, as it has its own retail and town centre policy?

TIG's answer: The policies should have distinct and complementary functions.

Reasoning...

- 3.7.1 Policy S22 should govern plan-led provision associated with strategic Hoo growth. Policy DM12 should continue to protect and manage existing local and rural centres, including the existing Hoo centre where applicable.
- 3.7.2 A clear cross-reference would avoid any implication that S22 displaces the protections applicable to the existing centre. That is consistent with B13's requirement that new provision should complement rather than undermine existing centres.

Regulation 19 basis: TIG Main Representation, section 5.7; E.37 / SDLP 115, together with TIG's wider objection to the scale of strategic Hoo growth.

Change necessary: Clarify the respective application of S22 and DM12 to new strategic provision and the existing Hoo centre. See MM-TIG-M8-03.

4. OVERALL CONCLUSION ON THIS MATTER

- 4.1 TIG does not oppose the principle that retained strategic development should be supported by appropriate shops, services and community facilities. B13 contains a substantive Hoo-specific assessment and provides an evidential basis for planned local provision under the large-growth scenario it assessed.
- 4.2 The important point is that B13 itself treats the centre strategy as dependent upon the scale and location of residential growth and acknowledges that the growth areas had not then been finally set. Policy S22 should therefore not operate as a fixed, freestanding three-centre strategy regardless of the examination's conclusions on Hoo Peninsula development.
- 4.3 If the submitted Hoo growth is retained substantially as proposed, the Council should demonstrate clearly why the three-centre configuration, east-of-Hoo preference, hierarchy and impact-assessment mechanism follow from the evidence. If the Hoo

quantum is materially reduced or redistributed, S22 should be consequentially modified so that the number, scale, location and phasing of centres remain proportionate.

- 4.4 Matter 8 is not relied upon by TIG as an independent basis for withdrawal of the whole Plan. TIG's wider position remains that if defects in the spatial strategy cannot be remedied without fundamentally recasting the Plan, withdrawal and re-preparation may be required. In that event Policy S22 would necessarily need to be reconsidered as part of the replacement strategy.

5. MAIN MODIFICATIONS / CHANGES SOUGHT

- 5.1 These changes are consequential upon TIG's Regulation 19 spatial-strategy case and apply only insofar as Policy S22 is retained within a sound strategy.

Ref	Plan policy / text	Defect identified	Modification / change sought	Why necessary
MM-TIG-M8-01	Policies S16 / S22 - number, scale and phasing of Hoo centres	Policy S22 fixes three centres although B13's recommendation was based on a particular, then-unsettled growth scenario.	Amend S22 so that the number, scale and phasing of centres are expressly proportionate to the final scale and distribution of Hoo Peninsula growth found sound. If the growth quantum is materially reduced or redistributed, require consequential review of the three-centre configuration.	Necessary to make the policy justified and effective and to prevent centre provision becoming detached from the growth it is intended to serve.
MM-TIG-M8-02	Policy S22 / Policy S16 hierarchy and location	The status of the "main centre", the basis for the east-of-Hoo preference and the meaning of "attractive location" are insufficiently clear.	Identify the hierarchy classification and role of each S22 centre; explain or amend the east-of-Hoo preference by reference to final growth and accessibility evidence; and clarify "attractive location" using objective accessibility, placemaking, co-location and deliverability criteria.	Necessary for clarity, justification and effective development management.

MM-TIG-M8-03	Policy S22 final paragraph / Policy T17 / Policy DM12	The relationship between the plan-level requirement for new centres, impact assessment and protection of the existing Hoo centre is unclear.	Clarify when an impact assessment is triggered, what it tests, its relationship with T17, and that S22 does not displace DM12 protections. Retain an explicit requirement that new provision must complement and not undermine the vitality, viability, role and function of the existing Hoo centre and other relevant centres.	Necessary to protect the hierarchy and make the policy effective.
EX-TIG-M8-04	B13 / Policy S22 evidence alignment	B13 assessed a growth scenario of up to about 5,500 homes, possibly 7,000 longer term, and acknowledged that final growth areas were not yet set.	Require the Council to identify the final dwelling quantum and spatial distribution relied upon for S22 and demonstrate that the submitted number, scale and location of centres remain proportionate to that final strategy.	Necessary to demonstrate that the submitted policy remains justified by the evidence on which it relies.

6. TIG REGULATION 19 REPRESENTATIONS AND EXAMINATION DOCUMENTS REFERRED TO

Reference	Document	Where relevant
TIG Reg 19 E.37 / SDLP 110-112, 115 and 118	TIG Main Representation	Hoo Peninsula allocations, alternative spatial strategy, urban regeneration, neighbourhood plan and infrastructure.
A1	Submission Medway Council Local Plan 2041	Sections 8.3 and 8.12; Policies S16, S22, T17 and DM12.
B13	Medway Retail and Town Centres Study 2025	Paragraphs 5.49-5.56, particularly 5.53-5.55.
B22.8	Main Town Centre Uses Topic Paper	Paragraphs 2.2.7(b) and 3.1.2.
MLP/ED14	Draft Hearing Programme (v1)	Matter 8 hearing session - 24 September 2026.
MLP/ED15	Phase 1 Matters, Issues and Questions	Matter 8, questions 8.4, 8.54-8.59 and 8.69.

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.*