

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hoo Peninsula Campaign (Additional responses)	H.56	File Q	A C Driver	SDLP 1824	N/A	Members of the Public	Infrastructure is overstretched, with poor transport and services (in particular doctors and schools). Overall, plans are unsustainable and harmful. Concern over lack of proposals for road improvements (including bus services) and rail link from the peninsula	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hoo Peninsula Campaign (Additional responses)	H.56	File Q	A C Driver	SDLP 1825	N/A	Members of the Public	The plan fails to meet legal and policy requirements, including inadequate Duty to Cooperate, flawed consultation, non-conformity with the NPPF and neighbourhood plans, poor environmental assessments, weak infrastructure planning, and unsustainable spatial strategy—particularly overdevelopment in the Hoo Peninsula, risking harm to habitats and wildlife. Green belt loss threatens biodiversity, community wellbeing, and market health.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.56	File Q	A C Driver	SDLP 1826	N/A	Members of the Public	Chatham Docks' redevelopment risks heritage and jobs.	7. Economic Development					
Email	E.76	File B	Abbey Developments	SDLP 291	Les West Planning (Les West)	Developers or Agents	* Figure 1: No evidence to justify a 'strategic gap' as captured in policy S4	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	Clarify the Council's intentions for the notation of Strategic Gap on Figure 1 either in the policy for the Spatial Development Strategy or in text supporting policy S4.		
Email	E.76	File B	Abbey Developments	SDLP 292	Les West Planning (Les West)	Developers or Agents	* Does not meet the tests of soundness due to failure in identifying the development potential of a small site immediately adjacent to the eastern settlement boundary of Rainham off Meresborough Road. * para 3.1.1: Failure to recognise the potential development of the site promoted by Abbey Home makes the plan unsound. *Restriction of development potential in this area is likely to have a negative impact on planning balance with further development elsewhere.	3. Spatial Development Strategy			Amend the boundary of the built-up area of Rainham to include the site at Meresborough Road.	No	
Email	E.76	File B	Abbey Developments	SDLP 293	Les West Planning (Les West)	Developers or Agents	Support but needs to provide clarity on location of small sites that are supported.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders	A sentence should be added to the policy which makes it clear that it affects sites both inside and outside the existing settlements.	No	
Email	E.76	File B	Abbey Developments	SDLP 294	Les West Planning (Les West)	Developers or Agents	Policy S4 does not meet the tests of soundness as it could unduly undermine the potential of the site on Meresborough Road, Rainham. * the policy has insufficient clarity on how it could be applied * It is likely to undermine development proposals in future * It has not been positively prepared * The site is included in the Green & Blue Infrastructure Framework without any evidence of the site being appraised * no evidence for the strategic gap.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	There needs to be a commitment in either the policy or in the supporting paragraphs to the publication of some further supplementary guidance on 'strategic gaps', and specifically the East Kent Fruit Belt, with the opportunity for consultation.	No	
Email	E.76	File B	Abbey Developments	SDLP 295	Les West Planning (Les West)	Developers or Agents	* there is a concern of reliance on documents that are non-statutory like the Green & Blue Infrastructure Framework and the Local Nature Recovery strategy. * Inclusion of the development site in these documents precludes development from coming forward on this site.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure, Paragraph 4.6 & Figure 2: Green and Blue Corridors, from Medway Green and Blue Infrastructure Framework (Draft)	Policy S5 should be clearer about the weight to be given to the non-statutory documents, i.e. the draft Medway Green and Blue Infrastructure Framework and the draft Medway Local Nature Recovery Strategy in both policy making and development management decisions.	No	
Email	E.97	File L	Abi Teague	SDLP 334	N/A	Members of the Public	Rainham Parkside village Lower Rainham is unsustainable for development and should be removed from plan.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email	E.97	File L	Abi Teague	SDLP 335	N/A	Members of the Public	Concern about road network coping with traffic increase.	9. Transport					
Online	372	Online (OPUS)	AC Goatham & Son [372]	4594	Bloomfields (Ben Young)	Developers or Agents	The representation reinforces the strategic fit of Flanders Farm within the Local Plan's vision for rural development and supports its inclusion in the Hoo Development Framework.	1. Overview	1.1 Introduction	Paragraph 1.1.1			
Online	372	Online (OPUS)	AC Goatham & Son [372]	4597	Bloomfields (Ben Young)	Developers or Agents	Split Policy Approach: The site is covered by two separate policies (SA14 and SA08), which may cause confusion. A single, unified policy is recommended for clarity and effective delivery. Concept Plan Ambiguity: Maps in the Local Plan (Summary Booklet and Figure 14) suggest a split between retail (front) and employment (rear), but lack clear legends and definitive intent. Flexibility needed in land uses dependent on the market - demand-led. A market-responsive masterplan is essential, with retail as the starting point. Lack of availability of the HDF, but is a required consideration as per Policy SA14 creates uncertainty and risk for site promoters and investors. Policy wording should allow development to proceed even if the HDF is delayed.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			

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Online	372	Online (OPUS)	AC Goatham & Son [372]	4599	Bloomfields (Ben Young)	Developers or Agents	Support this strategic vision for Hoo.	3. Spatial Development Strategy					
Online	372	Online (OPUS)	AC Goatham & Son [372]	4600	Bloomfields (Ben Young)	Developers or Agents	* Support the vision to promote sustainable growth and service provision. * Support policy approach regarding employment. * Criteria must be flexible enough to accommodate future changes in the agricultural sector, allowing for growth and diversification without being overly restrictive	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Online	372	Online (OPUS)	AC Goatham & Son [372]	4601	Bloomfields (Ben Young)	Developers or Agents	Support ambition to deliver a supermarket but concerned about the E use class mix. Refers to comments under SA8	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Online	372	Online (OPUS)	AC Goatham & Son [372]	4605	Bloomfields (Ben Young)	Developers or Agents	* Need a single policy for Flanders Farm. * The policy should allow for flexibility to respond to the market, i.e. follow a master planned approach rather than fixing at the plan making stage. * Support a broader range of E use class. * Residential should be considered a viable alternative.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.1	It is considered that the plan could be improved by providing a single policy to cover the Flanders Farm site, that would allow for a retail-led, mixed-use scheme. This policy should allow for flexibility to enable the best use of the site. The spatial layout of the site should be determined by market conditions, rather than being spatially determined at plan-making stage. The client is keen to explore a mixed-use scheme, and the policy should not repress the potential for housing development to form part of this, should it be considered a	Yes	To ensure the site can be delivered in a timely way, should it be necessary.
Online	372	Online (OPUS)	AC Goatham & Son [372]	4608	Bloomfields (Ben Young)	Developers or Agents	* Support the vision for Rainham Parkside but the delivery time in the policy does not align with the 2033 objective. * Lower Rainham Concept Plan (Figure 15) lacks clarity on how the Local Centre will function * Flexibility needed for the location of the centre. * Support separate delivery of 15 temporary accommodation homes * IDP does not justify the need for the secondary school. 750 alone would not provide sufficient pupil yield. Improve policy clarity, especially around: * Open space and sports provision, * Landscape and design requirements - Point 7 is unnecessary, Landscape guidance and planning should be moved to other parts of the LP, i.e. design and layout of streets and Green Infrastructure respectively. * Design and layout of streets should reference the LCA 2024 * SME parcel definitions and site references - sites RN17, RN23, RN25 are not shown on the concept plan and don't appear to contribute to 750. Need clarification on parcel size cap of 99 dwellings. * Ensure flexibility and strategic master planning to support	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Online	372	Online (OPUS)	AC Goatham & Son [372]	4908	Bloomfields (Ben Young)	Developers or Agents	Any future policy should allow for flexibility to enable the best use of this strategically important and well-located site on the edge of the Rainham urban settlement.	14. Site Allocations	14.11 Lower Rainham	Figure 15: Lower Rainham Concept Plan	Any future policy should allow for flexibility to enable the best use of this strategically important and well-located site on the edge of the Rainham urban settlement, which is seen as an opportunity to deliver an important and new strategically planned community	Yes	To ensure the best aspirations are achieved for the site.
Online	372	Online (OPUS)	AC Goatham & Son [372]	4909	Bloomfields (Ben Young)	Developers or Agents	It is key that the intentions of the Council are made clearer in what form the HHH19 site will take when it supports this growth. Policy SA14 sets out that site HHH19 should provide 14,000 sqm of B2 floorspace, it seems that this is in addition to the retail provision planned, but the intention is not clear. Suggests the site be master planned, and if B2 or retail use do not come forward that alternative uses be considered.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Email	E.145	File L	Alex Cameron	SDLP 798	N/A	Members of the Public	Supports sustainable growth through housing, infrastructure, and environmental protection. Prioritise affordable housing, biodiversity, brownfield development, and climate resilience. Viability assessments should be carried out on, sustainable transport, and innovative housing. Cultural and creative sectors should be integrated into Medway's economic strategy.	2. Vision and Strategic Objectives					
Email	E.50	File L	Alf & Sharon Wightwick	SDLP 206	N/A	Members of the Public	Objection to reclassifying land grey belt and why can't brownfield land be used.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.50	File L	Alf & Sharon Wightwick	SDLP 207	N/A	Members of the Public	Objection to increased house building as existing infrastructure is already struggling to cope, queries why cant infrastructure be built earlier.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.24	File L	Alison Wells	SDLP 68	N/A	Members of the Public	The Local Plan is not legally compliant or sound - inadequate evidence of meaningful engagement at Reg 18, and insufficient regard paid to community representations in the Reg 19 draft.	1. Overview	1.3 How the plan has been prepared				
Email	E.24	File L	Alison Wells	SDLP 69	N/A	Members of the Public	Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31) and Hoo NP.	1. Overview	1.3 How the plan has been prepared				
Email	E.24	File L	Alison Wells	SDLP 70	N/A	Members of the Public	Insufficient integration of HRA. HRA is flawed in its methodology and fails to correctly apply the precautionary principle.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Habitats Regulation Assessment			

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Email	E.24	File L	Alison Wells	SDLP 71	N/A	Members of the Public	Insufficient Integration of SEA. SA fails to legally satisfy the SEA Directive.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.24	File L	Alison Wells	SDLP 72	N/A	Members of the Public	Lack of Evidence for Infrastructure Delivery and Monitoring. The IDP and monitoring framework are vague and legally inadequate, contrary to Reg 19 and NPPF para 35.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.24	File L	Alison Wells	SDLP 73	N/A	Members of the Public	The Local Plan does not minimise development allocations on the Hoo Peninsula and maximise development allocations in the urban area. This is crucial in order to reduce impacts on the Hoo Peninsula's habitats and wildlife	14. Site Allocations					
Email	E.24	File L	Alison Wells	SDLP 74	N/A	Members of the Public	Lack of Evidence for Infrastructure Delivery and Monitoring. The IDP and monitoring framework are vague and legally inadequate, contrary to Reg 19 and NPPF para 35.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.132	File R	Allhallows Parish Council	SDLP 730	N/A	MPs, Members and Parish Councils	Regulation 19 consultation was reduced to a minimum - Legal compliance.	1. Overview	1.3 How the plan has been prepared			Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 731	N/A	MPs, Members and Parish Councils	Plan is missing evidence-based documentation which is required before submission.	1. Overview	1.3 How the plan has been prepared	Evidence base		Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 732	N/A	MPs, Members and Parish Councils	Transport policies – concern over congestion at Four Elms roundabout. Lacking information in relation to Bus Rapid Transit Corridor and junction upgrades.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds		Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 733	N/A	MPs, Members and Parish Councils	Need significant retail development to reduce the need to travel.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 734	N/A	MPs, Members and Parish Councils	Support for environmental policies	4. Natural Environment				Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 735	N/A	MPs, Members and Parish Councils	Support for Local Plan objectives	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 736	N/A	MPs, Members and Parish Councils	Very little information on Transport hub for Hoo Peninsula.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Paragraph 14.6.1		Yes	
Email	E.132	File R	Allhallows Parish Council	SDLP 737	N/A	MPs, Members and Parish Councils	No indication of funding or timescale for Grain Branch line extension of the existing freight line.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch		Yes	
Email	E.39	File L	Andrew & Ann Collins	SDLP 124	N/A	Members of the Public	Objection to Lower Rainham development due to adverse traffic impacts, loss of good agricultural land, strain on sewage and water treatment, strain on health and education provision , degradation of local environment/SPA and SSSIs, building design/estate layout and delivery/penalties to developer on infrastructure delivery.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email	E.71	File L	Andy Mugford	SDLP 286	N/A	Members of the Public	Article 4 Direction should be considered in Medway, which would require any conversion of a residential dwelling into a House in Multiple Occupation (HMO) to be subject to the full planning permission process and formal approval.	6. Housing	6.8 Houses of multiple occupation	Policy T8: Houses of Multiple Occupation			
Email	E.11	File L	Angela Connelly	SDLP 29	N/A	Members of the Public	Queries reclassification of Strood areas to grey belt and impact on the environment and amenities. Queries what consideration has been given to brownfield land note that some land is designated as heritage, what does this mean for the proposed development	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.11	File L	Angela Connelly	SDLP 30	N/A	Members of the Public	Concerns about the lack of infrastructure and increased traffic stemming from (Strood) developments.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1773	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1774	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1775	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1776	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1777	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1778	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1779	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			

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Hoo Peninsula Campaign (Additional responses)	H.50	File Q	Angela Turner	SDLP 1780	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1721	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1722	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1723	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1724	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1725	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1726	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1727	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1728	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1729	N/A	Members of the Public	Concern over road capacity and traffic that will be caused.	9. Transport	9.2 Monitoring and managing development				
Hoo Peninsula Campaign (Additional responses)	H.44	File Q	Anna Cole	SDLP 1730	N/A	Members of the Public	Concern over scale of proposed development and lack of infrastructure.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.205	File M	Antoinette Wilcox	SDLP 1354	N/A	Members of the Public	Concerned about Medway's natural environment and wildlife; development at Gibraltar Farm, Lidsing, East Hill, Bredhurst, Capstone Valley, Star Lane, Lower Rainham and Hoo threatens farmland, AONB, Ramsar sites and species (bats, badgers, newts, skylarks)	4. Natural Environment					
Email	E.205	File M	Antoinette Wilcox	SDLP 1355	N/A	Members of the Public	Need to prioritise brownfield use and protect Medway's green spaces and farmland	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email	E.205	File M	Antoinette Wilcox	SDLP 1356	N/A	Members of the Public	Need for subsidised frequent transport	9. Transport					
Email	E.154	File A	Arcelor Mittal Kent Wire	SDLP 883	Dentons (Lucy McDonnell)	Business	There is no indication that the Council have considered the spatial and location uniqueness of the docks, nor the consequences of redeveloping them as homes in the Emerging Plan or supporting documents.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		Yes	ArcelorMittal Kent Wire wish to participate in the hearing sessions, to fully explain the shortcomings of the draft Local Plan.
Email	E.154	File A	Arcelor Mittal Kent Wire	SDLP 884	Dentons (Lucy McDonnell)	Business	Evidence base: * inadequate in relation to the contribution of the docks and the role of retaining port and specialist manufacturing. * inconsistent with draft allocation	1. Overview	1.3 How the plan has been prepared	Evidence base: Employment Needs Assessment		Yes	ArcelorMittal Kent Wire wish to participate in the hearing sessions, to fully explain the shortcomings of the draft Local Plan.
Email	E.154	File A	Arcelor Mittal Kent Wire	SDLP 885	Dentons (Lucy McDonnell)	Business	* ArcelorMittal Kent Wire submit that Medway Council have failed to consider the contribution of Chatham Docks to their strategic objectives. * Offers carbon benefits * proposed redevelopment is not consistent with job creation/security/skills development * The impact of redevelopment has not been considered and the loss of port specialist manufacturing capability has not been fully assessed	2. Vision and Strategic Objectives	2.2 Strategic objectives		We consider that the scale of issues is such that the draft Local Plan could not be amended at this stage to address legal compliance or soundness.	Yes	ArcelorMittal Kent Wire wish to participate in the hearing sessions, to fully explain the shortcomings of the draft Local Plan.
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4927	Iceni Projects (Lucy Morris)	Developers or Agents	Support vision and allocation within SA6	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041			
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4928	Iceni Projects (Lucy Morris)	Developers or Agents	Support the strategic objectives and proposed allocation SA6 to achieve these objectives.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Paragraph 2.2.1			

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Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4929	Iceni Projects (Lucy Morris)	Developers or Agents	Supports the inclusion of allocation SA6	3. Spatial Development Strategy					
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4930	Iceni Projects (Lucy Morris)	Developers or Agents	Supports Green Belt boundary revision and release of land identified in SA^	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4931	Iceni Projects (Lucy Morris)	Developers or Agents	* Remove or revise the requirement to offer unsold self-build plots to the Local Authority. * Modify Policy T3 to allow self-build plots to contribute to affordable housing where appropriate. * Ensure the policy is positively prepared, justified, and consistent with national guidance and viability guidance.	6. Housing	6.9 Self-build and Custom Housebuilding	Policy T9: Self-build and Custom Housebuilding	The policy wording should be amended in line with the recommendations included in our attached submission.	Yes	BDW wishes to attend the hearing sessions to further respond to the Council on this policy and present oral evidence to the Inspector as
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4932	Iceni Projects (Lucy Morris)	Developers or Agents	BDW supports the inclusion of Land North of Rede Court Road for 360 homes under Policy SA6. However, BDW objects to the current form of the policy, citing concerns over its evidence base, effectiveness, and alignment with national policy, making it unsound. Recommendations: * Revise the Concept Plan to reflect realistic development and infrastructure delivery. * Remove or relocate the school to avoid unjustified land-take and cross-boundary complications. * Clarify access routes and heritage considerations. * Ensure the policy is sound, flexible, and aligned with national planning guidance.	14. Site Allocations	14.7 Strood West	Figure 12: Land West of Strood Concept Plan	Amendments should be made to the Concept Plan. Please refer to the attached submission for further detail.	Yes	As one of the developers of land contained within Policy SA6, further work is being undertaken to support the policy and the accompanying masterplan. It will be necessary to present this work to the Inspector at EiP and provide oral evidence to demonstrate how the policy can be
Online	915	Online (OPUS)	Barratt David Wilson Homes [915]	4933	Iceni Projects (Lucy Morris)	Developers or Agents	* Querying soundness of policy SA6 - suggests more evidence needed to support policy on infrastructure requirements. * Suggests the policy is overstating the need for supporting infrastructure - e.g. education provision required. More clarity requirement in IDP, justify the need and clarify who will deliver. * Greater detail on extent of infrastructure required and responsibility for delivery. Cross boundary impact if delays with GBC local plan - could delay site delivery. * Cross- boundary risks: Querying phasing within policy SA6 if for e.g. GBC has delays.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	BDW proposes to remove the requirement for Gravesham to approve the masterplan and for the production of further evidence to support infrastructure requirements and how they will be delivered. Please also refer to the attached submission.	Yes	As one of the developers of land contained within Policy SA6, further work is being undertaken to support the policy and the accompanying masterplan. It will be necessary to present this work to the Inspector at EiP and provide oral evidence to demonstrate how the policy can be
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 977	DHA (Matthew Woodhead)	Developers or Agents	Extend the plan period by at least a year. The plan period should be increased at least 16 years, with a requirement for at least 26,176 homes (27, 485 including the 5% buffer)	1. Overview	1.3 How the plan has been prepared			Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 978	DHA (Matthew Woodhead)	Developers or Agents	Duty To Cooperate is incomplete and SoCG's are missing. Therefore is not positively prepared.	1. Overview	1.4 Duty to Cooperate			Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of

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Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 979	DHA (Matthew Woodhead)	Developers or Agents	SA6: * No information regarding mechanism for agreeing masterplan * Allow for early delivery without reliance on Gravesham BC * Viability Assessment lacks evidence to support S106 developer contributions.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 980	DHA (Matthew Woodhead)	Developers or Agents	Support but recommends policy amends. The requirement for “dementia friendly standards” is not specific and is already included in Policy T4 and Bellway would raise concerns regarding its inclusion. The requirement for M4 dwellings (Building Regulations) can be included as a standalone policy or within Policy T2 (Housing Mix), as this allows for dwellings which are adaptable to various living situations.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design	Remove the 3rd bullet of policy regarding dementia friendly standards to be incorporated.	Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 981	DHA (Matthew Woodhead)	Developers or Agents	Bullet point 6 is already covered by Policy S1 and should therefore be removed and not repeated, to be “Consistent with National Policy” (paragraph 16(f) of the NPPF). Furthermore, this is also now superseded by Building Regulations.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Remove bullet 6 from the policy to be compliant with national policy.	Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 982	DHA (Matthew Woodhead)	Developers or Agents	Support, however the need for self build plots is dealt with in Policy T9 and should therefore be removed.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Amend policy as follows: 'Development schemes must demonstrate that as part of the housing mix, sufficient consideration has been given to: * older persons housing need, (particularly for downsizing); * custom and self-build plots. The criteria outlined in policy T4 and T9 needs to be observed.'	Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 983	DHA (Matthew Woodhead)	Developers or Agents	Needs to include tenure split to be compliant with national policy. It also requires affordable housing for older person. This is not viable or practical.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Amend policy as follows: "Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment."	Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of

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Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 984	DHA (Matthew Woodhead)	Developers or Agents	Concerns raised over the planning obligations sought with no evidence or justification.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment		Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.165	File H	Bellway Strategic Land (Brompton Farm)	SDLP 985	DHA (Matthew Woodhead)	Developers or Agents	Consider the site to be grey belt, in accordance with conclusion of the Plan, however, contest that the site is grey belt on the basis that Chapter Farm is developed. Even if Chapter Farm were not to be developed, this site would be grey belt and could therefore come forward in isolation, without reliance of the development of land outside of Medway Council's jurisdiction.	1. Overview	1.3 How the plan has been prepared	Evidence base: Green Belt Assessment		Yes	To discuss the legal compliance and soundness of the Plan with specific reference to: - The Duty to Cooperate - Strategic Policies and Legal Tests - Housing Supply and Delivery - Site Allocation SNF5 and Policy SA6 (land west of
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1000	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1001	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1002	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1003	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1004	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1005	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1006	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1007	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1008	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1009	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1010	DHA (Alice Day)	Developers or Agents	Policy sets out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF (para 16d) in being "clear". The policy must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1011	DHA (Alice Day)	Developers or Agents	The IDP is not linked to the Council's housing trajectory. It is therefore not evidenced that the Council can deliver housing in line with required infrastructure delivery. Furthermore, there are significant identified infrastructure funding gaps both in the IDP and Viability Appraisal. It is therefore evident that additional new unconstrained greenfield sites such as "Land to the East of Mierscourt Road, Rainham" will need to be identified, to support infrastructure provision, including the delivery of much needed affordable housing, to ensure the delivery of sustainable development in line with the NPPF and the vision for the Local Plan.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1012	DHA (Alice Day)	Developers or Agents	There is no substantive evidence demonstrating that the site SM16 (and others in Policy SA4) is therefore deliverable, especially within the early part of the Plan. Allied to this, it is noted that there are significant infrastructure requirements expressly listed in the Policy which remain to be resolved and impact all sites identified under Policy SA4. This includes the need for flood defences. The cost of which (if funding is not forthcoming from sources such as Homes England, as suggested in the policy) can be prohibitive. There are further time implications in terms of their delivery, should funding be secured.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 1013	DHA (Alice Day)	Developers or Agents	The Site (LAND TO THE EAST OF MIERSCOURT ROAD, RAINHAM (PART OF SITE RSE10) as identified in the Council's SA) is suitable, available and achievable now and would make a valuable contribution to addressing the Council's current significant housing shortfall, especially within the immediate 5 year period. The Site should therefore be included as a new Site allocations under Policy SA12 (Other Sites).	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 986	DHA (Alice Day)	Developers or Agents	Policy S4 does not reference a "strategic gap", but supporting paragraphs 4.5.2, 4.7.2 and 4.12.2 and Figure 1 do. It is therefore of significant concern that the Plan is potentially trying to introduce such a concept ("strategic gap") without the need for this being evidentially based or being clearly set out. Therefore Policy S4 cannot be considered to be "Positively Prepared" or "Justified" where it could unnecessarily restrict the delivery of development, including windfall opportunities, on which the Council intends to rely on as part of its housing delivery. The implications of this policy are therefore unclear and must be clarified to be considered "Sound".	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 987	DHA (Alice Day)	Developers or Agents	The policy as currently worded is vague as to how it is to be applied, e.g. "wider components" is underdefined. The implications of this policy are therefore unclear and to what extent it will impact the delivery of both allocated and windfall sites. As such the policy cannot be considered "Consistent with National Policy" where it could frustrate and prevent the delivery of the Council's identified development needs. In accordance with the NPPF (para 20 d) the policy must be clearly written. How it is to be applied must therefore be clarified if it is to found "Sound".	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 988	DHA (Alice Day)	Developers or Agents	Policy DM9 requires that proposals should be submitted in Full, where development lies within or may impact a Conservation Area. It is unclear why this requirement only applies to Conservation Areas, when it would be more reasonably applied to development's that impact heritage assets of higher significance, such as Scheduled Ancient Monuments. This is an unnecessary burdensome requirement, which could significantly delay the delivery of development. The Council, on the submission of an application, also has powers under Article 5 (2) of General Development Management Procedure Order 2015 to request full details of the proposals if required. Accordingly, this requirement should be removed where it is not considered "Justified".	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 989	DHA (Alice Day)	Developers or Agents	Policy DM10 as currently drafted does not allow for the “balancing exercise” to be undertaken in accordance with the NPPF (para 215). The Policy should therefore be amended. The last bullet point of the policy must be removed which seeks applications to “remove features that detract from the character of the area unless demonstrated to be unachievable”. This is an unreasonable requirement which is not “Justified” or “Consistent with National Policy.	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council’s LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 990	DHA (Alice Day)	Developers or Agents	There is no definition of what “materially lower” is. For the policy and the Plan to satisfy the requirements of the NPPF (para 16 d) to ensure it is deliverable and policies are clearly written, what is expected in terms of trips being “materially lower” must be defined, otherwise decision makers and those bringing forward sites do not know how to act, causing delay and inconsistency in approach. Also the Infrastructure Delivery Plan (IDP) which makes no reference to this policy under the Policy references. Furthermore, it provides no further information on what the vehicle trip credit is (as is suggested by the Policy) , making it impossible to determine in any event how a development might go about demonstrating it is “materially lower”. The policy fails to be clearly written as required by the NPPF (para 16 d) and is not demonstrated to be deliverable also contrary to the NPPF (para 16 b). It therefore fails to be “Consistent with National Policy” or “Justified “.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council’s LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 991	DHA (Alice Day)	Developers or Agents	There is no plan or any other tool in the Viability Appraisal which is easily discernible, that determines where the cut off area is for higher or lower value areas. Without the extent of these areas being physically identified on a Plan, the Policy is clearly ambiguous, meaning it is likely to be applied inconsistently and does not provide a positive framework for meeting housing needs contrary to the NPPF (para 15). Allied to this and contrary to the NPPF (para 64) the policy fails to set out the different affordable tenures that should be sought. The policy as currently drafted therefore fails to be “Consistent with National Policy”. The policy must be amended to clarify the tenure split sought. In addition, the policy requires affordable provision to “reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment”. Depending on the size of the site and the nature of the need this may not be practicable/viable i.e. a minimum number of properties might be needed to make the provision viable for an RP given their specialist nature. The bullet point should therefore be amended to ensure the policy is “Effective”. Suggested wording given.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	“Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment.”	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council’s LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 992	DHA (Alice Day)	Developers or Agents	The policy as currently worded fails to define what is meant by "employment uses". As such the policy could be applied in a highly restrictive manor that could undermine the Local Plan's spatial strategy and as such failing to be "Positively Prepared" and "Effective". Supporting para 7.8.10, loosely refers to the uses as serviced based and community focussed activities. To ensure the consistent application of the Policy in accordance with the NPPF (para 16d) and in line with para 88 of the NPPF, the policy should define employment and community uses as E class uses, accessible local services and community facilities such as local shops, meeting places, sports venues and cultural buildings.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 993	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 994	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 995	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.4 Gillingham District Centre	Policy SA3: Gillingham District Centre		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 996	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 997	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 998	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.166	File I	Bellway Strategic Land (Mierscourt Road)	SDLP 999	DHA (Alice Day)	Developers or Agents	There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short. In additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan period and specifically within the first 5 years.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1039	DHA (Alice Day)	Developers or Agents	Strategic Sites cover over 18,000 homes, with estimated S106 contributions totalling £488 million. Approximate bill is £645 million, leaving a funding gap of around £157 million. The gap applies to the remaining 6,450 homes in the Local Plan. Some infrastructure costs (e.g. for Hoo) are still unknown and may increase the shortfall. Additional greenfield sites are needed to help fund infrastructure and ensure the Plan is viable and legally "Sound".	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1040	DHA (Alice Day)	Developers or Agents	The Plan as currently drafted fails to satisfy its legal duties as set out under Section 19 of the Planning & Compulsory Purchase Act 2004. A new strategic housing policy must be included in the Local Plan, based on a 16yr Plan period which seeks to deliver 26,176 new homes. Additional sites must be identified to satisfy this requirement. Further sites must also be identified to demonstrate a 5yr supply of deliverable sites.	3. Spatial Development Strategy			A new strategic housing policy must be included in the Local Plan.	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1041	DHA (Alice Day)	Developers or Agents	With reference to the proposed site allocations, the LAA does not identify a deliverable supply of sites sufficient to meet Local Plan requirement either over a 15 yr or 16 yr period. It further demonstrates that the Council does not have a 5 yr supply as required by the NPPF (para 78). The Council therefore simply cannot demonstrate that the Plan is "Positively Prepared", "Effective" or "Consistent with National Planning Policy". The Plan must identify more sites, such as "Land to the South of Moor Street, Rainham" to ensure the planned housing requirement is met over the	3. Spatial Development Strategy				Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1042	DHA (Alice Day)	Developers or Agents	In the context that the Council has not identified sufficient sites to meet the housing requirement for the Plan period (which needs to be extended to 16ys), and is unable to demonstrate a 5yr supply of Sites, the Spatial Strategy cannot be considered "Sound" where it fails to meet the requirements of National policy in facilitating the delivery of development to meet its requirements. It can therefore also not be considered "effective". The spatial strategy must therefore be updated to facilitate the delivery of other Sites to meet requirements, such as those set out in these	3. Spatial Development Strategy			The spatial strategy must therefore be updated to facilitate the delivery of other Sites to meet requirements, such as those set out in these representations.	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1043	DHA (Alice Day)	Developers or Agents	Reference to strategic gap, must be removed from Figure 1. There is no such policy relating to this designation nor is it shown on the accompanying proposals map. Figure 1 therefore seeks to introduce this designation/consideration unsupported by any policy. Accordingly, it is not considered "Justified". The Figure should further be amended to include "Land to the South of Moor Street, Rainham" to ensure the Plan can address it housing requirement and thus be found "Sound"	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	Reference to strategic gap, must be removed from Figure 1. There is no such policy relating to this designation nor is it shown on the accompanying proposals map. The Figure should further be amended to include "Land to the South of Moor Street, Rainham".	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1044	DHA (Alice Day)	Developers or Agents	*Medway must significantly boost housing delivery, but this depends on timely infrastructure, especially highways to avoid delays. *Infrastructure must be delivered alongside housing to meet sustainability standards under the NPPF and Planning Act. *The Infrastructure Delivery Plan (IDP) lists £654M in projects, but 29 are uncostered. No clear link between infrastructure delivery and the housing trajectory. *Heavy reliance on brownfield sites, many of which may not meet viability thresholds for full S106 contributions. Some approved sites won't contribute to new infrastructure costs. * Key developments (e.g. Hoo Peninsula) require complex masterplans and multi-landowner coordination, risking delays due to grampian conditions. * Unconstrained areas like "Land to the South of Moor Street" could help meet housing and infrastructure needs, including affordable housing. *Annual need is 436 homes, but brownfield sites typically deliver only 10% affordable, limiting supply and undermining the Council's vision	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1045	DHA (Alice Day)	Developers or Agents	Objection raised due to unclear implications of "strategic gap" references in supporting text and diagrams. The policy lacks clarity and justification, potentially restricting development unnecessarily	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1046	DHA (Alice Day)	Developers or Agents	Criticised for vague wording and undefined "wider components" of infrastructure. Cross-references to draft frameworks make application uncertain. Requires clearer definitions to be considered sound	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1047	DHA (Alice Day)	Developers or Agents	Requires full applications for developments affecting Conservation Areas, but not for other significant heritage assets. This is seen as unjustified and overly burdensome.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1048	DHA (Alice Day)	Developers or Agents	Fails to allow for the NPPF's balancing exercise. The requirement to remove detracting features is considered unreasonable and potentially unviable.	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1049	DHA (Alice Day)	Developers or Agents	Requires developments to demonstrate trip generation "materially lower" than IDP credits, but lacks definition of "materially lower" and clarity on how credits are calculated. Considered unclear and undeliverable	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1050	DHA (Alice Day)	Developers or Agents	Criticised for ambiguity in geographic thresholds and lack of clarity on tenure mix. Needs clearer mapping and specification of affordable housing types.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	"Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment.	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1051	DHA (Alice Day)	Developers or Agents	"Employment uses" are undefined, risking overly restrictive interpretation. Suggests defining uses in line with Use Class E and community facilities.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1052	DHA (Alice Day)	Developers or Agents	Heavy reliance on brownfield sites (40% of housing supply) is risky. The Local Plan targets 40% of housing (9,816 homes) on brownfield land, with much of it expected in the first 5 years. The Viability Assessment warns against over-reliance on brownfield sites due to delivery challenges. The Council lacks evidence to justify this reliance, especially given its fragile 5-year housing supply and limited staff	14. Site Allocations		Site Allocations 1-12		Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1053	DHA (Alice Day)	Developers or Agents	The representation highlights issues with sites like Chatham Waters, which are currently in employment use and subject to complex tenancies. Bellway notes that converting these to residential use would result in the loss of valuable employment land and that significant infrastructure requirements, such as flood defences, remain unresolved. These factors cast doubt on the short-term deliverability of the River Waterfront allocations.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1054	DHA (Alice Day)	Developers or Agents	Development depends on a strategic masterplan, infrastructure delivery plan, and environmental management plan, requiring multi-landowner coordination. Environmental policies demand mitigation measures to protect sensitive sites before occupation. Planning applications are pending, but key requirements remain unmet, risking delays or funding gaps. Without agreed mitigation, short-term delivery of housing in this area is highly uncertain, the current proposals would not be deliverable.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1055	DHA (Alice Day)	Developers or Agents	SA7 proposes 3,958 homes by 2041; SA10 proposes 750 homes by 2033. Both sites risk merging distinct settlements, contradicting the Plan's aim to prevent coalescence. SA10 overlaps with a previously dismissed appeal due to significant landscape harm. No new evidence explains why the current proposals would avoid similar environmental impacts.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1056	DHA (Alice Day)	Developers or Agents	Refers to "major development" . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Refers to "major development" . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1057	DHA (Alice Day)	Developers or Agents	Refers to "major development" . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries	Refers to "major development" . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1058	DHA (Alice Day)	Developers or Agents	Refer to "major" and "strategic" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Refer to "major" and "strategic" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1059	DHA (Alice Day)	Developers or Agents	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1060	DHA (Alice Day)	Developers or Agents	Refers "large-scale" development . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	Refers "large-scale" development . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1061	DHA (Alice Day)	Developers or Agents	Applies to "minor development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces	Applies to "minor development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1062	DHA (Alice Day)	Developers or Agents	Refers "large-scale" development . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications	Refers "large-scale" development . Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.168	File I	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	SDLP 1063	DHA (Alice Day)	Developers or Agents	Previously identified as a preferred site but removed without consultation. Bellway proposes two phases (200 + 250 homes) as immediately deliverable and aligned with spatial strategy. Advocates for inclusion under SA12.	14. Site Allocations	14.13 Other sites	Policy SA12: Other Sites (Site RSE10)	Previously identified as a preferred site but removed without consultation. Bellway proposes two phases (200 + 250 homes) as immediately deliverable and aligned with spatial strategy. Advocates for inclusion under SA12.	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1014	DHA (Alice Day)	Developers or Agents	Strategic Sites cover over 18,000 homes, with estimated S106 contributions totalling £488 million. Approximate bill is £645 million, leaving a funding gap of around £157 million. The gap applies to the remaining 6,450 homes in the Local Plan. Some infrastructure costs (e.g. for Hoo) are still unknown and may increase the shortfall. Additional greenfield sites are needed to help fund infrastructure and ensure the Plan is viable and legally "Sound".	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1015	DHA (Alice Day)	Developers or Agents	The Plan as currently drafted fails to satisfy its legal duties as set out under Section 19 of the Planning & Compulsory Purchase Act 2004. A new strategic housing policy must be included in the Local Plan, based on a 16yr Plan period which seeks to deliver 26,176 new homes. Additional sites must be identified to satisfy this requirement. Further sites must also be identified to demonstrate a 5yr supply of deliverable sites.	3. Spatial Development Strategy			A new strategic housing policy must be included in the Local Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1016	DHA (Alice Day)	Developers or Agents	With reference to the proposed site allocations, the LAA does not identify a deliverable supply of sites sufficient to meet Local Plan requirement either over a 15 yr or 16 yr period. It further demonstrates that the Council does not have a 5 yr supply as required by the NPPF (para 78). The Council therefore simply cannot demonstrate that the Plan is "Positively Prepared", "Effective" or "Consistent with National Planning Policy". The Plan must identify more sites, such as "Land to the South of Moor Street, Rainham" to ensure the planned housing requirement is met over the	3. Spatial Development Strategy				Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1017	DHA (Alice Day)	Developers or Agents	In the context that the Council has not identified sufficient sites to meet the housing requirement for the Plan period (which needs to be extended to 16ys), and is unable to demonstrate a 5yr supply of sites, the Spatial Strategy cannot be considered "Sound" where it fails to meet the requirements of National policy in facilitating the delivery of development to meet its requirements. It can therefore also not be considered "effective". The spatial strategy must therefore be updated to facilitate the delivery of other sites to meet requirements, such as those set out in these	3. Spatial Development Strategy			The spatial strategy must therefore be updated to facilitate the delivery of other Sites to meet requirements, such as those set out in these representations.	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1018	DHA (Alice Day)	Developers or Agents	Reference to strategic gap, must be removed from Figure 1. There is no such policy relating to this designation nor is it shown on the accompanying proposals map. Figure 1 therefore seeks to introduce this designation/consideration unsupported by any policy. Accordingly, it is not considered "Justified". The Figure should further be amended to include "Land to the South of Moor Street, Rainham" to ensure the Plan can address it housing requirement and thus be found "Sound"	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	Reference to strategic gap, must be removed from Figure 1. There is no such policy relating to this designation nor is it shown on the accompanying proposals map. The Figure should further be amended to include "Land to the South of Moor Street, Rainham"	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1019	DHA (Alice Day)	Developers or Agents	*Medway must significantly boost housing delivery, but this depends on timely infrastructure, especially highways, to avoid delays. *Infrastructure must be delivered alongside housing to meet sustainability standards under the NPPF and Planning Act. *The Infrastructure Delivery Plan (IDP) lists £654M in projects, but 29 are uncosterd. No clear link between infrastructure delivery and the housing trajectory. *Heavy reliance on brownfield sites, many of which may not meet viability thresholds for full S106 contributions. Some approved sites won't contribute to new infrastructure costs. *Strategic Site Delays: Key developments (e.g. Hoo Peninsula) require complex masterplans and multi-landowner coordination, risking delays due to grampian conditions. *Alternative Sites: Unconstrained areas like "Land to the South of Moor Street" could help meet housing and infrastructure needs, including affordable housing. *Affordable Housing Shortfall: Annual need is 436 homes, but brownfield sites typically deliver only 10% affordable, limiting supply and undermining the Council's vision.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1020	DHA (Alice Day)	Developers or Agents	Objection raised due to unclear implications of "strategic gap" references in supporting text and diagrams. The policy lacks clarity and justification, potentially restricting development unnecessarily	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1021	DHA (Alice Day)	Developers or Agents	Criticised for vague wording and undefined "wider components" of infrastructure. Cross-references to draft frameworks make application uncertain. Requires clearer definitions to be considered sound	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1022	DHA (Alice Day)	Developers or Agents	Requires full applications for developments affecting Conservation Areas, but not for other significant heritage assets. This is seen as unjustified and overly burdensome.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1023	DHA (Alice Day)	Developers or Agents	Fails to allow for the NPPF's balancing exercise. The requirement to remove detracting features is considered unreasonable and potentially unviable.	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1024	DHA (Alice Day)	Developers or Agents	Requires developments to demonstrate trip generation "materially lower" than IDP credits, but lacks definition of "materially lower" and clarity on how credits are calculated. Considered unclear and undeliverable	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1025	DHA (Alice Day)	Developers or Agents	Criticised for ambiguity in geographic thresholds and lack of clarity on tenure mix. Needs clearer mapping and specification of affordable housing types.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	"Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment.	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1026	DHA (Alice Day)	Developers or Agents	"Employment uses" are undefined, risking overly restrictive interpretation. Suggests defining uses in line with Use Class E and community facilities.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1027	DHA (Alice Day)	Developers or Agents	Heavy reliance on brownfield sites (40% of housing supply) is risky. The Local Plan targets 40% of housing (9,816 homes) on brownfield land, with much of it expected in the first 5 years. The Viability Assessment warns against over-reliance on brownfield sites due to delivery challenges. The Council lacks evidence to justify this reliance, especially given its fragile 5-year housing supply and minimal buffer	14. Site Allocations		Site Allocations 1-12		Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1028	DHA (Alice Day)	Developers or Agents	The representation highlights issues with sites like Chatham Waters, which are currently in employment use and subject to complex tenancies. Bellway notes that converting these to residential use would result in the loss of valuable employment land and that significant infrastructure requirements, such as flood defences, remain unresolved. These factors cast doubt on the short-term deliverability of the River Waterfront allocations.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1029	DHA (Alice Day)	Developers or Agents	Development depends on a strategic masterplan, infrastructure delivery plan, and environmental management plan, requiring multi-landowner coordination. Environmental policies demand mitigation measures to protect sensitive sites before occupation. Planning applications are pending, but key requirements remain unmet, risking delays or funding gaps. Without agreed mitigation, short-term delivery of housing in this area is highly uncertain, the current proposals would not meet the requirements of the plan.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1030	DHA (Alice Day)	Developers or Agents	SA7 proposes 3,958 homes by 2041; SA10 proposes 750 homes by 2033. Both sites risk merging distinct settlements, contradicting the Plan's aim to prevent coalescence. SA10 overlaps with a previously dismissed appeal due to significant landscape harm. No new evidence explains why the current proposals would avoid similar environmental impacts.	14. Site Allocations		Site Allocations 1-12		Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1031	DHA (Alice Day)	Developers or Agents	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1032	DHA (Alice Day)	Developers or Agents	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1033	DHA (Alice Day)	Developers or Agents	Refer to "major" and "strategic" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Refer to "major" and "strategic" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1034	DHA (Alice Day)	Developers or Agents	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Refers to "major development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1035	DHA (Alice Day)	Developers or Agents	Refers "large-scale" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	Refers "large-scale" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1036	DHA (Alice Day)	Developers or Agents	Applies to "minor development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces	Applies to "minor development". Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1037	DHA (Alice Day)	Developers or Agents	Refers "large-scale" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications	Refers "large-scale" development. Must be amended to be define the circumstances under which they will be applied or definitions included within the appendices to the Plan	Yes	
Email	E.167	File I	Bellway Strategic Land (South of Moor Street) (Phase 1)	SDLP 1038	DHA (Alice Day)	Developers or Agents	Previously identified as a preferred site but removed without consultation. Bellway proposes two phases (200 + 250 homes) as immediately deliverable and aligned with spatial strategy. Advocates for inclusion under SA12.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites (Site RSE10)	Previously identified as a preferred site but removed without consultation. Bellway proposes two phases (200 + 250 homes) as immediately deliverable and aligned with spatial strategy. Advocates for inclusion under SA12.	Yes	
Email	E.198	File M	Ben Barnes-Farnham	SDLP 1291	N/A	Members of the Public	Concerned over the irreversible harm from the proposed Rainham Parkside Village development. Concern that development threatens Grade 1 agricultural land, rural landscape, and local highways, referencing a similar plan rejected in 2021 (Ref: MC/19/1566). The site is a nationally recognized 'valued landscape' with rural character, serving as a buffer between urban and rural areas. Urge protection against major development with concern that proposed development will worsen existing congestion and strain.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email	E.93	File B	Berengrave Lane 2 Ltd	SDLP 320	Iceni Projects (Simon Fowler)	Developers or Agents	Requests amendment to LCA.	1. Overview	1.3 How the plan has been prepared	Evidence base: Landscape Character Assessment	The landscape qualities of the LCA E1 (and all LCA areas) should be graded to include areas of Primary, Secondary and Tertiary importance.		
Email	E.93	File B	Berengrave Lane 2 Ltd	SDLP 321	Iceni Projects (Simon Fowler)	Developers or Agents	General support for Spatial Development Strategy, Vision and Strategic Objectives	2. Vision and Strategic Objectives					
Email	E.93	File B	Berengrave Lane 2 Ltd	SDLP 322	Iceni Projects (Simon Fowler)	Developers or Agents	Request for amendment (Minor Mod) of figure in Local Plan in relation to agents site.	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	Figure 1 of p.23 of the Plan which appears to show the Site falling within a Strategic Gap and the omission of the Site as a "Development site (Residential)".		

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.34	File L	Bill McLennan	SDLP 100	N/A	Members of the Public	Policy T23, which locks in Rochester Airport's continued operation, is fundamentally unsound and should be withdrawn. It clashes with national policy by failing to avoid or mitigate environmental harm (NPPF para109), neglecting brownfield prioritisation (para 125), and bypassing proper Duty to Cooperate processes. The airport is being protected without full public consultation or clarity on future compensation liabilities under the Land Compensation Act 1973, exposing taxpayers to financial risk. No recent public mandate exists—the last meaningful consultation was over ten years ago—and Medway Council has never independently assessed the airport's viability on its reduced, single-runway footprint or compared it to alternative mixed-use options. The Council's defence that land sales to the Innovation Park subsidise the airport masks the true cost and opportunity loss. A 2013 W.S. Atkins review concluded that a mixed-use approach (housing, retail, technology park, public space) would be far more optimal than a standalone airfield. Historic promises (noise reduction, improved safety) have gone unfulfilled, and neither the consultant critique nor any cross-council agreements have been published, undermining transparency and legal compliance. In light of these failures—policy conflicts, financial unknowns, lack of evidence, and procedural gaps—T23 should be struck from the Local Plan and the airfield land reconsidered for higher-	9. Transport	9.7 Aviation	PolicyT23: Aviation		No	
Email	E.34	File L	Bill McLennan	SDLP 101	N/A	Members of the Public	Policy T23 gives Rochester Airport de facto safeguarding—yet no such protection exists in the 2003 Medway Plan or Tonbridge & Malling Plan, and the site isn't heritage-listed. Key airport users (air ambulance, preservation society) don't require an operational runway, and a 1998 W.S. Atkins study warned that an active runway alongside the Innovation Park undermines land value and investment. The policy locks in unlimited general-aviation operations without public consultation, viability or compensation assessments, and runs counter to NPPF Section 9 (failing to mitigate environmental harm or prioritise brownfield reuse). By concentrating all flights over the M2 motorway and high-speed rail less than 200 m away, T23 exacerbates serious safety risks; yet no operational criteria or impact-management measures are set out. Unlike Stoke aerodrome, only Rochester is "safeguarded," revealing a policy bias toward private aviation interests, foregoing a higher-value mixed-use redevelopment in the public interest. Historic investments—£4 million from SELEP and further council funding—were paid without enforcing operator contributions or delivering promised safety/noise improvements. T23 should be removed and replaced with a neutral, site-specific assessment of the airport's future viability.	9. Transport	9.7 Aviation			No	
Online	266	Online (OPUS)	Bloomfields Ltd (Mr Ben Young, Associate) [266]	4603	N/A	Developers or Agents	HHH19 (Deangate Retail Park) Retail Use and Flexibility: While the retail-led approach is supported, the restriction to only E(a) and E(b) uses is seen as too narrow. Suggests allowing wider E use classes (e.g., E(d) indoor recreation, E(f) nurseries) with justification required at application stage, to ensure future flexibility and adaptability to market demand. Mixed-Use Potential: Recommends a less restrictive policy that allows for a market-tested masterplan, balancing retail and employment uses. Notes a lack of clarity in the evidence base regarding how retail and employment uses would complement each other on the site. Infrastructure and Access: Supports the proposed pedestrian crossing over the A228 and traffic calming measures to promote active travel. Funding for this infrastructure should be part of a strategic plan, not solely the responsibility of adjacent developments.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 528	DHA (Jack Harley)	Developers or Agents	Duty to cooperate is incomplete and unresolved. The missing completed Duty to Cooperate Statement must be made available for consultation before proceeding to examination	1. Overview	1.4 Duty to Cooperate			No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 529	DHA Planning (Jack Harley)	Developers or Agents	Plan period should be extended to 2042.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Extend plan period to 2042	No	

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Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 530	DHA Planning (Jack Harley)	Developers or Agents	Wording of the Criteria 1a.i) and 1a.ii) of the aforementioned policy [SA13] currently restrict any proposals within the Opportunity Area being delivered before the adoption of the Frindsbury Peninsula Planning Framework in 2030 /31. A timetable for the development of the Framework should be established to ensure the policy and supporting framework is sound.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 531	DHA Planning (Jack Harley)	Developers or Agents	Need to plan and provide for alternative commercial space in Medway to give options for businesses to move to from Medway City Estate.	7. Economic Development	7.2 Employment strategy			No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 532	DHA Planning (Jack Harley)	Developers or Agents	Clear the development pipeline is led by Kingsnorth and the Isle of Grain. Businesses to the east of Kent will be unlikely to make use of these locations and the Council will need other land to come forward early in the plan period as an alternative to MCE for SMEs.	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15.12		No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 533	DHA Planning (Jack Harley)	Developers or Agents	Amendments have been proposed to Policy SA13 to make the policy, and 'Local Plan, "Sound," by providing certainty over the delivery of the initial phase of the Opportunity Area within this Plan period.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 534	DHA Planning (Jack Harley)	Developers or Agents	Consider if any of the sites identified within the Frindsbury Opportunity Area could be delivered as independent allocations to enable additional homes to be brought forward in the plan period.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14		No	
Email	E.116	File B	Blue Harbour Investment Ltd	SDLP 535	DHA Planning (Jack Harley)	Developers or Agents	Reliance on concept plan (figure 16) and Planning Framework to be delivered in 2030/31 without a detailed timetable for its production of clarity on landowner alignment shows plan in not positively prepared.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Figure 16: Frindsbury Peninsula Concept Plan		No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4537	Saviills (Amelia Robson)	Developers or Agents	Policy SA4, generally supports the aspiration and objectives, there are some objections and concerns over Policy SA4: River Waterfront, including: site boundary accuracy, land ownership matters potentially affecting link with Gillingham District Centre.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	Amend site boundary accuracy on Policy SA4: River Waterfront.	Yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4538	Saviills (Amelia Robson)	Developers or Agents	Object to policy S1 in its current form as there is a lack of clarity in relation to the techniques suggested for flood risk mitigation.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Requests clarity in Policy S1 in relation to the techniques suggested for flood risk mitigation.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4539	Saviills (Amelia Robson)	Developers or Agents	Recommend that the Policy provides further clarity on the requirements and how the Green Infrastructure Plan and its content is required to meet policy objectives. Also suggests that the Policy be clear in promoting the links and paths whilst understanding that third party ownership outside of the control of developers and landowners can limit fully implementing routes.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Policy provides further clarity on the requirements and how the Green Infrastructure Plan and its content is required to meet policy objectives.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4540	Saviills (Amelia Robson)	Developers or Agents	There is no policy within the Reg 19 Consultation which refers to 'building heights / views' and as such we cannot comment on the content of such a policy. Our previous representations referenced the lacuna in policy and that if such a policy relating to 'building heights / views' was not included as an emerging policy, reference to it should be removed. Maintain position and object. Policy T1 also states that proposals should make efficient use of land. supports this approach, but it should also set out that development will be supported where this is achieved through higher densities where appropriate. The Policy should include reference to 'densities should be maximised where possible', in line with para 128 of the	5. Built Environment	5.2 High Quality Design	Policy T1: High Quality Design and Amenify	The Policy should include reference to 'densities should be maximised where possible'	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4541	Saviills (Amelia Robson)	Developers or Agents	The policy references 'building heights/views' policy, which there is no reference to and so cannot be commented on. Maintain our objection to the policy. Additionally, Policy T1 should support higher densities where appropriate, aligning with NPPF Paragraph 128 to maximise land use efficiency.	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenify	Policy T1 should also set out that development will be supported where this is achieved through higher densities where appropriate. The Policy should include reference to 'densities should be maximised where possible', in line with Paragraph 128 of the NPPF.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4542	Saviills (Amelia Robson)	Developers or Agents	Several criteria which do not incorporate sufficient flexibility to ensure that specific requirements although aspirational, are also deliverable. Natural features (e.g. green walls, roofs etc.) however this may not be realistic for certain types of development or particular sites and should not be a minimum but instead implemented 'wherever possible'. Object to policy. Unrealistic and not achievable for all developments.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Please see above.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4543	Saviills (Amelia Robson)	Developers or Agents	Objects to policy as does not reference that Custom and Self Build and older persons accommodation is not suitable for all sites to be included in mix.	6. Housing	6.2 Housing Mix	Policy T2: Housing Mix	Please see above.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4544	Saviills (Amelia Robson)	Developers or Agents	Objects to policy as no map provided of high and low value areas.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	Map of high value and low value areas.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4545	Saviills (Amelia Robson)	Developers or Agents	Supports policy but seeks further clarity around how an application can demonstrate a proposal 'meets a proven need'.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Further clarity on proposals meeting a proven need.		

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Online	694	Online (OPUS)	Blueberry Homes [694]	4546	Saviills (Amelia Robson)	Developers or Agents	Objects to S10 as seeks clarification on what 'key regeneration opportunity areas' refers to. Policy should support small scale job generating uses as part of larger residential mixed use scheme	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Please see above.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4548	Saviills (Amelia Robson)	Developers or Agents	Object to the Policy as it does not specifically provide wording which supports small scale retail and service uses as part of major residential or mixed-use schemes. Raised this in reg 18 - these uses make positive contributions to communities outside of the defined centres.	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy	Please see above.	Yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4549	Saviills (Amelia Robson)	Developers or Agents	*No concerns with the inclusion of a sequential test policy, but recommend that the policy is reworded to simply require a sequential assessment to be undertaken in accordance with national policy and guidance, removing those elements that are duplicated. *Object to the introduction of a requirement to demonstrate trade draw of a proposal, in order to inform the sequential test. The policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17. *The policy should also be clear that proposals would not be subject to a sequential assessment where they are classed as Ancillary Development under the terms of Policy T16. *Final paragraph refers to demonstrating sustainable travel choices under DM18 and DM19. This is not relevant to a sequential assessment policy, avoids unnecessary duplication, and those policies will need to be complied with where relevant. Object as the Policy provides duplication.	8. Retail and Town Centres	8.4 Sequential assessment	Policy T15: Sequential assessment	Recommend that the policy is reworded to simply require a sequential assessment to be undertaken in accordance with national policy and guidance, removing those elements that are duplicated. Policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy TYes7. The policy should also be clear that proposals would not be subject to a sequential assessment where they are classed as Ancillary Development under the terms of Policy TYes6	Yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4550	Saviills (Amelia Robson)	Developers or Agents	Revised wording of policy is confusing. Objects to need for policy T16, which is covered by T15 and 17. Suggests removing policy T16.	8. Retail and Town Centres	8.5 Ancillary development	Policy T16: Ancillary development	Remove Policy TYes6.	Yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4551	Saviills (Amelia Robson)	Developers or Agents	Concerns with the detailed requirements of Policy T17: Impact Assessment, including: Thresholds, impact assessment and object to wording of final paragraph	8. Retail and Town Centres	8.6 Impact Assessment	Policy T17: Impact Assessment		yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4552	Saviills (Amelia Robson)	Developers or Agents	Polices S19 (Gillingham District Centre) and S20 (Strood District Centre), refer to "All proposals should...". To avoid ambiguity, policies should clearly state "All proposals within the centre should...". This will ensure that they are effective.	8. Retail and Town Centres	8.9 Gillingham district centre	Policy S19: Gillingham district centre	Policies should clearly state "All proposals within the centre should...". This will ensure that they are effective, in order to avoid any ambiguity and provide certainty for applicants		
Online	694	Online (OPUS)	Blueberry Homes [694]	4553	Saviills (Amelia Robson)	Developers or Agents	Suggested rewording policy S19 to "All proposals <u>within the centre</u> should..." to ensure policy is effective.	8. Retail and Town Centres	8.9 Gillingham district centre	Policy S19: Gillingham district centre	Suggested rewording policies S19 and S20 to "All proposals within the centre should..."		
Online	694	Online (OPUS)	Blueberry Homes [694]	4553	Saviills (Amelia Robson)	Developers or Agents	Suggested rewording policy S20 to "All proposals <u>within the centre</u> should..." to ensure policy is effective.	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre	Suggested rewording policies S19 and S20 to "All proposals within the centre should..."		
Online	694	Online (OPUS)	Blueberry Homes [694]	4554	Saviills (Amelia Robson)	Developers or Agents	Potential land ownership / third party matters when implementing schemes which can limit fully implementing provision of footpaths to adjacent sites. Acknowledged that amendments have been made to provide more flexibility to allow the facilitation of links within the developer / landowners control, but it does not provide sufficient flexibility to ensure that as adjacent sites come forward for development, there is the ability to provide a continuous link without limiting progress with implementation. We therefore maintain our position and object to the Policy. Policy also states that 'development proposals will demonstrate how any impacts will be mitigated'. The Policy is not clear in providing details about what impacts are required to be assessed as part of this Policy.	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path	Please see above.	Yes	In order that the matters raised in our representation can be considered in full at the hearing session.
Online	694	Online (OPUS)	Blueberry Homes [694]	4555	Saviills (Amelia Robson)	Developers or Agents	Supports policy T27 generally but policy is aspirational and not likely deliverable. Objection on 'location of specific types of development will be carefully managed to avoid possible adverse impacts on health and wellbeing, one of those being an off-licence' as small scale stores will often include an off-licence and as such should be excluded from the policy.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Please see above.	No	
Online	694	Online (OPUS)	Blueberry Homes [694]	4556	Saviills (Amelia Robson)	Developers or Agents	Objects to Policy DM21, it does not comply with NPPF paragraph 16(d) and should provide sufficient flexibility which allows the existing open spaces in the vicinity to be assessed to inform how proposed open space and playing pitches should be reasonably delivered within developments. The table in Appendix C should specifically deal with new open space	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces	Table in Appendix C should specifically deal with new open space. Policy DM21 should provide sufficient flexibility which allows the existing open spaces in the vicinity to be assessed to inform how proposed open space and playing pitches should be reasonably delivered within developments.	No	

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Online	694	Online (OPUS)	Blueberry Homes [694]	4557	Saviills (Amelia Robson)	Developers or Agents	Supports general approach of the policy, need to include definition of a 'community facility' and consider different development proposals. Policy is currently not flexible to ensure deliverability and does not accord with para 16 NPPF. Overall objection to policy but not the principle aims of the policy.	10. Health, Communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	The Policy should be worded as such that facilities are delivered 'where there is an evidenced need' to ensure that any facilities are required and will be utilised by local communities and are evidence based.	No	
Email	E.126	File R	Boxley Parish Council	SDLP 689	N/A	MPs, Members and Parish Councils	Housing Need and Cross-Boundary Distribution - Medway has not taken on unmet housing need from neighbouring authorities nor shown it can meet its own Standard Method requirement without adverse impacts. There are no formal agreements or memoranda of understanding with adjacent councils (including Maidstone) on managing strategic housing needs. Significant overspill into Boxley Parish risks straining local infrastructure, increasing traffic, and exacerbating environmental constraints.	1. Overview	1.4 Duty to Cooperate			Yes	To present oral evidence in relation to: • Capstone Valley allocation • Cross-boundary infrastructure and environmental impacts • The failure of the Plan to align with strategic spatial principles and environmental
Email	E.126	File R	Boxley Parish Council	SDLP 690	N/A	MPs, Members and Parish Councils	Transport Infrastructure - Medway's collaboration with Kent County Council, National Highways, and neighbouring boroughs on cumulative transport impacts is under-specified. Key junctions (A229 and M2 near Walderslade and Lordswood) already face heavy congestion; further development without mitigation will worsen traffic for Boxley residents.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 691	N/A	MPs, Members and Parish Councils	Environmental and Infrastructure Impacts - Cooperation on air quality, green infrastructure, biodiversity corridors, and health provision is currently narrow in scope. Given the proximity of the Kent Downs AONB and ancient woodland, stronger, joined-up environmental assessments are needed.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 692	N/A	MPs, Members and Parish Councils	Transparency of Co-operation - The published Duty to Co-operate Statement lists engagement activity but provides little on tangible outcomes or agreed measures. It should clearly show how cross-boundary collaboration has shaped Medway's spatial strategy and Local Plan policies.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 693	N/A	MPs, Members and Parish Councils	Boxley Parish Council considers that Medway Council has not yet fulfilled the legal Duty to Co-operate in scope, effectiveness, or demonstrable outcomes. The Council urges Medway to: 1.Deepen and formalise dialogue with neighbouring authorities and relevant bodies. 2.Establish Statements of Common Ground to capture agreed positions and commitments. 3.Resolve cross-boundary issues before submitting the Local Plan for examination. Boxley Parish Council remains ready to engage further on any matters affecting its community.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 694	N/A	MPs, Members and Parish Councils	Boxley Parish Council questions whether the Duty to Cooperate has been fully met on cross-boundary impacts—especially increased traffic on the A229 and rural lanes affecting transport, air quality, and ecological networks. There was insufficient transparent or coordinated engagement with Maidstone Borough Council and neighbouring parishes, despite likely significant cumulative impacts. The Council requests sight of the evidence demonstrating strategic dialogue with Maidstone Borough Council on	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 695	N/A	MPs, Members and Parish Councils	Not Justified •The Local Plan fails to prove Capstone Valley is the most appropriate land-use strategy compared to reasonable alternatives. •Capstone Valley's role as a green lung and barrier to urban coalescence is well established in past landscape and Green Belt appraisals. •No credible rationale is provided for removing long-standing restrictions to permit large scale development	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 696	N/A	MPs, Members and Parish Councils	Not Consistent with National Policy •Conflicts with NPPF §174(a): Capstone Valley is a valued landscape used for recreation and environmental benefit. •Conflicts with NPPF §180: The area forms part of an ecological corridor; no evidence shows biodiversity functions can be maintained. •Conflicts with NPPF §105: The valley is poorly served by public transport and distant from main employment, promoting car dependency.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 697	N/A	MPs, Members and Parish Councils	•Hempstead Valley Shopping Centre is omitted from the District Centre designation on the Policies Map.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South West	Hempstead Valley Shopping Centre to be added to policies map (SW).	Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.126	File R	Boxley Parish Council	SDLP 698	N/A	MPs, Members and Parish Councils	Environmental Constraints and Technical Concerns •Air Quality: A229 and M2 corridors already in or bordering AQMAs; extra traffic will worsen pollution. •Topography and Flooding: Sloping ground and natural drainage may increase runoff and downstream flood risk. •Biodiversity: The area supports ancient woodland edges, hedgerows, and grassland; development risks irreversible habitat loss. •Landscape Character: Capstone Valley provides a natural break between settlements, recognised in the 2003 Plan	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 699	N/A	MPs, Members and Parish Councils	The proposed Capstone Valley allocation is unsound. It lacks justification, deliverable infrastructure, and policy compliance, and it threatens long-term environmental degradation and harm to Medway and neighbouring communities	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 700	N/A	MPs, Members and Parish Councils	•The LW8 'Millfield's Fields' allocation would erode the vital open space between Lordswood and Hempstead, sever the green corridor from Darland Banks through the Kent Downs National Landscape at Broadhurst and Boxley, and threaten ground-nesting birds such as the red-listed skylark. •The LW4 Shawstead Farm site equally damages the Darland Banks landscape when viewed from the public footpath between North Dane Way and Shawstead Farm Lane. •Both LW8 and LW4 appear to be late additions: they are omitted from the Transport Modelling evidence, which concentrates on the A228 Hoo/Grain corridor.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 701	N/A	MPs, Members and Parish Councils	The M2 junction 4 improvements are shown to be overloaded in the design year. There are serious design, viability and deliverability issues with the proposed alterations and 'improvements' at junction 4 and it appears very unlikely that it can be constructed within land under the landowner's control. It is also important to note that this junction improvement does not form part of either the Maidstone or Medway local plan Allocations. The lack of adequate road infrastructure will obviously result in unacceptable additional traffic flows in the villages of Boxley and Bredhurst. Adding 4,000 new homes on top of the 2,000-home Lidsing allocation and business park is unlikely to gain Highways England approval. Both Local Plans hinge on timely delivery of M2 Junction 4 improvements, yet that scheme remains untested. The Concept Plan fails to show how Millfields Fields would connect to the Strategic Road Network or maintain continuity of "green corridors."	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 702	N/A	MPs, Members and Parish Councils	There is no policy or funding agreement to expand Medway Hospital's capacity for existing and future residents, nor any evidence of engagement with the Local Health Trust on the housing numbers proposed	10. Health, communities and Infrastructure				Yes	
Email	E.126	File R	Boxley Parish Council	SDLP 703	N/A	MPs, Members and Parish Councils	See mods	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Respondent respectfully request that the Planning Inspector recommend modification or removal of the Capstone Valley allocation from the final Local Plan. Respondents strongly urges Medway Council to: • Remove or substantially reduce the housing allocation in Capstone Valley • Reassess brownfield regeneration capacity within urban Chatham, Gillingham, and Rochester • Focus future development in more sustainable, infrastructure-rich locations • Formally engage with Maidstone Borough Council and	Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 718	N/A	MPs, Members and Parish Councils	Duty to Cooperate - No clear strategy for meeting unmet housing needs from neighbouring authorities or demonstrating ability to satisfy Medway's own need without harmful side-effects.	1. Overview	1.4 Duty to Cooperate			Yes	We wish to appear at the Examination in Public to present evidence on • Capstone Valley allocation • cross-boundary impacts, and • strategic/environmental compliance.
Email	E.129	File R	Bredhurst Parish Council	SDLP 719	N/A	MPs, Members and Parish Councils	Collaboration with adjacent councils (for housing, transport, environmental protection and health provision) is minimal.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 720	N/A	MPs, Members and Parish Councils	Transport modelling fails to fully assess impacts on already-strained A229 corridor and M2 junctions.	9. Transport	9.2 Monitoring and managing development			Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 721	N/A	MPs, Members and Parish Councils	Joint environmental management is lacking, especially around the Kent Downs National Landscape and nearby ancient woodlands.	1. Overview	1.4 Duty to Cooperate			Yes	

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Email	E.129	File R	Bredhurst Parish Council	SDLP 722	N/A	MPs, Members and Parish Councils	The Duty to Co-operate Statement shows engagement but offers no concrete evidence of agreed outcomes.	1. Overview	1.4 Duty to Cooperate			Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 723	N/A	MPs, Members and Parish Councils	Not Justified – Long-recognised strategic landscape and ecological value; no credible reason for reversing past protection. 2. Not Effective – Reliance on major infrastructure (roads, public transport, schools, health) without clear deliverability or funding. 3. Not Consistent with National Policy – Conflicts with NPPF requirements to protect valued landscapes, safeguard biodiversity, and promote sustainable locations.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 724	N/A	MPs, Members and Parish Councils	Environmental & Technical Concerns - Air quality along A229/M2 already poor; development would worsen it. Risk of flooding, biodiversity loss, and landscape harm. Increased traffic in Bredhurst and Boxley.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 725	N/A	MPs, Members and Parish Councils	See requested mods	14. Site Allocations	14.8 Capstone Valley		Recommendations - Remove or reduce Capstone Valley housing allocation. Prioritise brownfield regeneration in Chatham, Gillingham, Rochester. Focus growth in sustainable, infrastructure-rich areas. Strengthen cross-boundary collaboration with Maidstone BC, Boxley and Bredhurst Parishes.	Yes	
Email	E.129	File R	Bredhurst Parish Council	SDLP 726	N/A	MPs, Members and Parish Councils	Environmental & Technical Concerns - Air quality along A229/M2 already poor; development would worsen it. Risk of flooding, biodiversity loss, and landscape harm. Increased traffic in Bredhurst and Boxley.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		Yes	
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1747	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1748	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1749	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1750	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1751	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1752	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1753	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1754	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.47	File Q	Brian & Iris Rickford	SDLP 1755	N/A	Members of the Public	Concern about Redrow development on Grade 1 farmland between Britannia Road and Christmas lane as this harms wildlife	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow			
Email	E.92	File L	Brian Annenberg	SDLP 319	N/A	Members of the Public	Development should not take place without supporting infrastructure and current infrastructure cannot support development.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hard copy	H.2	File N	Brian Clark	SDLP 1358	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hard copy	H.2	File N	Brian Clark	SDLP 1359	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hard copy	H.2	File N	Brian Clark	SDLP 1360	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.2	File N	Brian Clark	SDLP 1361	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.2	File N	Brian Clark	SDLP 1362	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hard copy	H.2	File N	Brian Clark	SDLP 1363	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hard copy	H.2	File N	Brian Clark	SDLP 1364	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hard copy	H.2	File N	Brian Clark	SDLP 1365	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				

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Hard copy	H.2	File N	Brian Clark	SDLP 1366	N/A	Members of the Public	Infrastructure is not in place to support anticipate growth (e.g. healthcare services, retail)	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.186	File K	Brookworth Homes	SDLP 1236	Parker Dann (Mark Best)	Developers or Agents	The current wording of policy SA6 artificially constrains delivery of housing, prevents efficient use of land and stymies the Government's growth ambitions. It is not consistent with national policy or positively prepared as identified above. * The Council should alter 'up to' to 'around' or preferably 'a minimum of' * We welcome the confirmation that the site will be expected to provide for residential land uses only * concerned about landscape-led requirement in criterion 12 and 16 and the requirement to work collaboratively with other developers including those in Gravesham BC. * Criterion 18 regarding S106 agreements need to consider	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.186	File K	Brookworth Homes	SDLP 1237	Parker Dann (Mark Best)	Developers or Agents	Separate Statement of Common Ground is required between Gravesham BC and Medway	1. Overview	1.4 Duty to Cooperate				
Email	E.186	File K	Brookworth Homes	SDLP 1238	Parker Dann (Mark Best)	Developers or Agents	Evidence: Viability Assessment SR5 is allocated for 120homes. The Viability Assessment refers to 200. SR5 is therefore unlikely to bear the cost of 45% affordable housing	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.140	File L	Bruce Cagneux	SDLP 767	N/A	Members of the Public	The proposed development of parcels 2–6 threatens Green Belt land, reducing farmland, increasing traffic, pollution, and puts pressure on local infrastructure. This could lead to more food importation, overstretched utilities and public services, raising concerns about sustainability and environmental impact. The proposed Green Belt development disregards local needs and available brownfield sites. The land is protected for its significance, and altering its boundaries contradicts the NPPF, which permits changes only under exceptional circumstances	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.35	File L	Carl Dunks	SDLP 102	N/A	Members of the Public	Clashes with national policy by failing to avoid or mitigate environmental harm (NPPF p109), neglecting brownfield prioritisation (p125).	3. Spatial Development Strategy					
Email	E.35	File L	Carl Dunks	SDLP 103	N/A	Members of the Public	It clashes with national policy by failing to avoid or mitigate environmental harm (NPPF p109), neglecting brownfield prioritisation (p125).	3. Spatial Development Strategy					
Email	E.35	File L	Carl Dunks	SDLP 104	N/A	Members of the Public	bypassing proper Duty to Cooperate processes.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1530	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1531	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1532	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1533	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1534	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1535	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1536	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1537	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1538	N/A	Members of the Public	Concern over single road access causing congestion and delays	9. Transport	9.11 Transport assessments, transport statements and travel plans				
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1539	N/A	Members of the Public	Concern of loss of Chatham Docks post-administration change.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1540	N/A	Members of the Public	Green Belt development threatens agriculture, wildlife, and environmental health	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			

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Hoo Peninsula Campaign (Additional responses)	H.25	File Q	Carol Driver	SDLP 1541	N/A	Members of the Public	Concern over infrastructure including poor healthcare wait times, inadequate bus services,	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.63	File L	Carol Pires	SDLP 258	N/A	Members of the Public	Unclear whether Medway Council will continue to exist under the government's intention to reform the 14 existing Kent councils.	1. Overview	1.2 Medway area				
Email	E.63	File L	Carol Pires	SDLP 259	N/A	Members of the Public	Queries if developers have any obligation to inform potential purchasers of flood risk? Without flood plains water will naturally find its own level elsewhere (Lower Rainham Road and Capstone proposed developments).	4. Natural Environment	4.8 Flood and water management				
Email	E.63	File L	Carol Pires	SDLP 260	N/A	Members of the Public	Queries availability affordable housing and if affordable housing quotas will be made by developers.	6. Housing	6.3 Affordable housing				
Email	E.63	File L	Carol Pires	SDLP 261	N/A	Members of the Public	LP proposals will negatively effect quality of life.	1. Overview					
Email	E.63	File L	Carol Pires	SDLP 262	N/A	Members of the Public	Queries whether health infrastructure will truly be delivered regarding Lower Rainham Road and Capstone proposed developments.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.78	File L	Caroline Crouch	SDLP 241	N/A	Members of the Public	Need for Article 4 Direction as part of planning policies for HMOs.	6. Housing	6.8 Houses of multiple occupation	Policy T8: Houses of Multiple Occupation			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1248	Savills (Phillipa Robinson)	Developers or Agents	Not justified or effective - insufficient greenfield to allow for flexibility in delivery. Furthermore the spatial strategy does not meet MC's total housing need.	3. Spatial Development Strategy				Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1249	Savills (Phillipa Robinson)	Developers or Agents	Not legally compliant – sequential test unnecessary reflected against NPPF and foul drainage is a requirement for water companies and is not a planning requirement.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1250	Savills (Phillipa Robinson)	Developers or Agents	Not justified or consistent with NPPF – MC have not considered sufficiently other sites for dev outside of the Green Belt	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1251	Savills (Phillipa Robinson)	Developers or Agents	This is covered by policy DM10.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1252	Savills (Phillipa Robinson)	Developers or Agents	This policy is not effective. Catesby are supportive of ensuring future development provides future residents with good access to local amenities and facilities. Land South of Lower Rainham Road has the ability to make valuable improvements to local cycling and walking networks alongside providing valuable facilities on site such as a primary school.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1253	Savills (Phillipa Robinson)	Developers or Agents	Not justified or effective – concerns about deliverability without the allocation of further growth. Strong objection to development restrictions to the west of Rainham Parkside Village.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1254	Savills (Phillipa Robinson)	Developers or Agents	Evidence available is incomplete, ambiguous and inconsistent. The evidence base supporting the MC R19 Local Plan is limited and does not fully justify the strategies within the R19 Local Plan. Further evidence is expected to support the R19 Local Plan.	1. Overview	1.3 How the plan has been prepared	Evidence base		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1255	Savills (Phillipa Robinson)	Developers or Agents	SA does not support a sound strategy taking int account reasonable alternatives. The SA does not support an appropriate strategy taking into account the reasonable alternatives. This is because the reasonable alternatives have not been assessed fairly. To ensure the Plan can be found sound it is recommended that: a. The SA should assess an option to deliver additional growth in North of Rainham as indicated in the housing thresholds of the SDOs. b. The assessment of reasonable alternative sites is updated to reflect a true post mitigation position. c. A consistent approach, that reflects the SA assessment should be adopted in respect of the selected and rejected	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		Yes	To ensure the plan is sound and legally compliant. Please see representations.

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Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1256	Savills (Phillipa Robinson)	Developers or Agents	LAA does not support a sound plan. Needs clarity on units of measurement, conclude on site assessments with reasons for discounting sites, reflect evidence from land owners. The LAA does not support a justified or effective Local Plan. The LAA should be revisited to take account of the following points: a. Provide clarity on the units of measurement that are used in the assessment (e.g. hectares, percentage, etc.) b. Provide a clear narrative to the conclusions of the Site assessment, including the specific reasons for discounting sites. c. Review of the assessment against evidence that has been provided to MC by landowners, promoters and	1. Overview	1.3 How the plan has been prepared	Evidence base: Land Availability Assessment		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1257	Savills (Phillipa Robinson)	Developers or Agents	The IDP does not support a justified or effective plan. The IDP does not support a justified or effective Plan. It is recommended that: a. The IDP is updated to reflect the infrastructure required within Draft Policy SA10. b. Consideration is given to the allocation of all or part of the Land South of Lower Rainham Road (RN5) to support the delivery of much needed infrastructure in the area	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To ensure the plan is sound and legally compliant. Please see representations.
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1258	Savills (Phillipa Robinson)	Developers or Agents	Paragraph 12.42 of the VA sets out that MCs estimated \$106 contribution in Lower Rainham is £25,718. It is not clear if this figure would seek to cover all the infrastructure requirements required as part of the draft allocation Policy SA10.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1259	Savills (Phillipa Robinson)	Developers or Agents	MC should incorporate modal shifts to plan for greater growth and accommodate the identified need in the area including unmet needs of other areas.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Transport Assessment			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1260	Savills (Phillipa Robinson)	Developers or Agents	The Local Housing Needs Assessment contradicts the housing need identified in the R19 consultation document.	1. Overview	1.3 How the plan has been prepared	Evidence base: Local Housing Needs Assessment			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1261	Savills (Phillipa Robinson)	Developers or Agents	The drafting of the policy is ambiguous and it not obvious what measures an applicants should implement within their schemes. It is recommended that the entire policy is redrafted with appropriate and deliverable requirements that can be incorporated into a development proposal	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1262	Savills (Phillipa Robinson)	Developers or Agents	Catesby recognises the importance of protecting Medway's valued landscapes however, they consider the Site can be sensitively designed to balance housing delivery with landscape enhancements	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1263	Savills (Phillipa Robinson)	Developers or Agents	Catesby are supportive of this policy and Land South of Lower Rainham Road is capable of providing ample green and blue infrastructure for existing and future residents.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1264	Savills (Phillipa Robinson)	Developers or Agents	Whilst Catesby are committed to high quality design, this policy is considered to be too extensive and lacks flexibility. Furthermore, the policy duplicates requirements already outlined in other policies within the R19 Local Plan, which may lead to confusion	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenity			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1265	Savills (Phillipa Robinson)	Developers or Agents	Catesby are supportive of the overarching principles in this policy however, clarity is required regarding references to outdated design guidance.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1266	Savills (Phillipa Robinson)	Developers or Agents	The aims and aspirations of this policy are supported by Catesby but it is suggested that the wording of draft policies S8, DM9 and DM10 are reviewed.	5. Built Environment	5.7 Historic environment	Policy S8: Historic Environment			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1267	Savills (Phillipa Robinson)	Developers or Agents	Catesby are supportive of the protection of Conservation Areas. However, it is suggested that the wording of draft policies S8, DM9, and DM10 are reviewed to avoid repetition and overlap	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1268	Savills (Phillipa Robinson)	Developers or Agents	Catesby are proposing that Land South of Lower Rainham Road can provide 30% affordable housing provision in line with this policy. They emphasise that due to the viability pressures on brownfield sites to deliver any affordable housing, greenfield development is crucial to meet MC's affordable housing needs	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1269	Savills (Phillipa Robinson)	Developers or Agents	Catesby would be willing to explore incorporating an element of C2 provision as part of the development proposals at Land South of Lower Rainham Road.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1270	Savills (Phillipa Robinson)	Developers or Agents	Catesby are supportive of this policy and Land South of Lower Rainham Road has the capacity to deliver at least 4% self-build / custom housing. The criteria within the policy is restrictive and could result in mainstream market and affordable housing being undelivered. Consequently, this policy should be reviewed	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1271	Savills (Phillipa Robinson)	Developers or Agents	Catesby wish to emphasise to MC that the protection of BMV agricultural needs to be effectively weighed up with the need for new housing and associated economic/sustainable benefits.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			

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Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1272	Savills (Phillipa Robinson)	Developers or Agents	The proposals at Land South of Lower Rainham Road have the ability to ensure pedestrians and cyclists are prioritised over private car use. Furthermore Catesby are willing to explore opportunities for upgrades to the local bus network.	9. Transport	9.9 User hierarchy and street design	Policy T25: User hierarchy and street design			
Email	E.190	File K	Catesby Strategic Land (Lower Rainham Road)	SDLP 1273	Savills (Phillipa Robinson)	Developers or Agents	It is considered that MC has not currently demonstrated the engagement that is legally required during the plan-making process. Notably, there is a lack of documentation of the cooperation between relevant stakeholders on matters such as housing need, infrastructure and cross boundary coordination. This presents a significant risk to the emerging Local Plan.	1. Overview	1.4 Duty to Cooperate				
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 622	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	The Plan is not positively prepared, as it fails to demonstrate effective cooperation with neighbouring authorities or respond adequately to regional housing needs. The Council must recommence effective and evidenced engagement with neighbouring authorities and statutory stakeholders, in accordance with legal requirements . Up-to-date and signed Statements of Common Ground should be used to inform an amended Spatial Strategy that reflects unmet housing needs within the wider housing market area.	1. Overview	1.4 Duty to Cooperate			Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 623	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	The Plan is not justified, as the spatial strategy is not supported by proportionate evidence, and reasonable alternatives have not been properly assessed.	3. Spatial Development Strategy				Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 624	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	The Plan is not effective, given the lack of delivery mechanisms, the use of a stepped trajectory and an over-reliance on brownfield sites without appropriate contingency. The minimum housing requirement should be revised upwards to reflect the most recent assessment of local housing need, inclusive of unmet need from adjacent authorities, establishing an annual requirement of at least 1,903 dwellings per annum.	6. Housing	6.1 Introduction	Paragraph 6.1.2		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 625	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	It is recommended that the Council undertake a reappraisal of omitted sites such as AS18 and AS22, to ensure the Plan is capable of delivering sustainable and effective growth in Medway through to 2041.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal (Sites AS18 and AS22)		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 626	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	The current appraisal fails to demonstrate legal compliance with the SEA Regulations and must be revisited to ensure robustness and soundness. The Sustainability Appraisal should be revised to include a full and transparent comparative assessment of all growth options considered during plan preparation, including Options 3 and 4 and any new incremental growth scenarios. The SA should be expanded to appraise reasonable spatial delivery alternatives, such as; strategic new settlements, employment-led growth, transport corridor-based development.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 627	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	A new overarching Housing Needs Policy should be inserted into the Plan, setting out: • The full housing requirement for the plan period. • A detailed breakdown of delivery sources, including commitments, permissions, allocations, and windfall assumptions. • The proposed spatial distribution of housing development.	6. Housing			A new overarching Housing Needs Policy should be inserted into the Plan, setting out: • The full housing requirement for the plan period • A detailed breakdown of delivery sources, including commitments, permissions, allocations, and windfall assumptions • The proposed spatial distribution of housing development	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 629	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supports the approach and encouraged to see text on the Hoo Peninsula Strategic Environmental Programme, but notes this is the only reference to this programme in the plan and it's poorly evidenced. No implementation details, unclear stakeholder roles, and lack of coordination. Policy is unsound without further evidence and stakeholder engagement.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 630	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Wording may conflict with developers' statutory rights under the Water Industry Act 1991. Recommendation: Amend policy to reflect developers' limited control over wastewater infrastructure and accurately reflect the statutory responsibilities of the statutory undertakers.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Amend policy to reflect developers' limited control over wastewater infrastructure and accurately reflect the statutory responsibilities of the statutory undertakers.	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 631	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supports inclusive housing design. Policy is vague and lacks specific standards or thresholds. Ambiguity makes it ineffective for decision-making.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 632	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Generally acceptable. Requirement for full applications in Conservation Areas is not legally or nationally mandated. Encourage full applications but allow outlines with sufficient detail.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 633	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supportive of self-build aims. Timing of design code is unclear. Make design code available at outline stage and encourage early engagement.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 634	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Policy is unnecessary and adds no value. Delete and integrate support for SMEs into broader housing policies.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders	Delete and integrate support for SMEs into broader housing policies.	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 635	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supports economic growth vision. Lacks regional context and cross-boundary cooperation. Revise to reflect Medway's role in the region.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Revise to reflect Medway's role in the region.	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 636	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Recognises strategic importance of Hoo Peninsula. Ambiguous spatial direction, unclear regarding infrastructure delivery and lack of mapping. Add spatial designations, delivery triggers, and infrastructure commitments.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula	Recommendation: Add spatial designations, delivery triggers, and infrastructure commitments.	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 641	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Criticised for unrealistic expectations in rural areas; needs flexibility.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 643	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	before supporting a 30% delivery target on greenfield sites, further understanding of the background information and evidence is required. lacks clarity on tenure mix and viability evidence.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 644	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Policy SA13 (Frindsbury Peninsula Opportunity Area): Criticised for vague timing, unclear relocation strategy, and lack of mixed-use detail.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 645	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Both sites (AS18 and AS22) fall within Grade 1 agricultural land. The Council has allocated other Grade 1 sites, making the rejection inconsistent. No clear sequential approach was used in site selection based on land quality.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal (Sites AS18 and AS22)		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 646	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	AS18 and AS22 are scored differently despite being adjacent. Transport mitigation measures were proposed, including improved bus services and EV access. Argues the Council did not properly assess post-mitigation impacts.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal (Sites AS18 and AS22)		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 647	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Council's spatial strategy lacks detail and relies heavily on large strategic sites. Smaller sites like AS18 and AS22 could support infrastructure and meet housing needs. Catesby argues these sites are consistent with sustainable development principles.	3. Spatial Development Strategy		Sites AS18 and AS22		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 648	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Catesby asserts that emerging Neighbourhood Plans should not override strategic site allocations. Strategic planning is the responsibility of the Local Planning Authority.	1. Overview	1.2 Medway area	Sites AS18 and AS22		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 649	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	AS18 and AS22 are suitable, available, and achievable. Sites are not within designated landscapes and have minimal constraints. Catesby has undertaken master planning and community engagement. Sites are under contract and ready for development.	1. Overview	1.3 How the plan has been prepared	Evidence base: Land Availability Assessment (Sites AS18 and AS22)		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 628	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supportive of ambition, but criticises lack of clarity, enforceability, and integration with other policies. No clear targets, missing retrofit provisions, weak transport emissions strategy and no monitoring framework. Recommendations - include energy hierarchy, measurable outcomes, retrofit strategy, and public engagement. Cross-reference with related policies. Update policy wording to align directly with the NPPF and Climate Change Act obligation	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Recommendations: Include energy hierarchy, measurable outcomes, retrofit strategy, and public engagement. Cross-reference with related policies. Update policy wording to align directly with the NPPF and Climate Change Act obligation.	Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 637	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supported.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 638	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supported.	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 639	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supported.	9. Transport	9.12 Parking	Policy DM20: Cycle Parking and storage		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.

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Email	E.122	File C	Catesby Strategic Land Limited	SDLP 640	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Supported but lacks clarity on funding, delivery, and monitoring.	9. Transport	9.1 Vision for access and movement in Medway			Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Email	E.122	File C	Catesby Strategic Land Limited	SDLP 642	Neame Sutton Ltd (Rhiannon Jones)	Developers or Agents	Housing mix should reflect the most up-to-date evidence and locally informed housing needs	6. Housing	6.2 Housing mix	Policy T2: Housing Mix		Yes	As set out in the Regulation 19 Representation Statement and appendices Catesby has found there to be significant deficiencies resulting in the plans failure in soundness. In order to best convey this to Inspector, a question and answer in person would be most beneficial to the Inspector fully understanding the issues at hand, including the discussion over housing figures and the intricacy of DC matters.
Online	490	Online (OPUS)	Catherine Waterman [490]	4338	N/A	Members of the Public	Important to maintain and protect our cultural infrastructure and its associated employment.	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries			
Online	490	Online (OPUS)	Catherine Waterman [490]	4339	N/A	Members of the Public	It is important to build more public walkways that are well lit and accessible.	9. Transport	9.3 Active travel interventions	Paragraph 9.3.3			
Online	490	Online (OPUS)	Catherine Waterman [490]	4340	N/A	Members of the Public	Important that health and social care is considered in any development. Supports growth but ensure resources are in place before that growth takes place.	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery	Paragraph 10.5.12			
Email	E.36	File L	Charlie Chester	SDLP 105	N/A	Members of the Public	Concerns regarding infrastructure -contravenes neighbourhood plans.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 173	N/A	Voluntary and Community Organisations	Formally objecting to the proposed allocation in Policy SA2 of the Riverside Site as Residential-only in the Regulation 19 version of the Local Plan. Request that this is described as a Mixed Use site in the same way as the Brunel Site. Positively prepared? Residential-only designation does not adequately address the cross-cutting strategic needs of the area - including employment, cultural development, and heritage-led regeneration - all of which are vital for balanced growth in Chatham.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites (Site CCB25)	Requests site CCB25 is marked as mixed use not residential.	Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 174	N/A	Voluntary and Community Organisations	Positively Prepared?- A residential-only designation does not adequately address the cross-cutting strategic needs of the area - including employment, cultural development, and heritage-led regeneration - all of which are vital for balanced growth in Chatham	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	

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Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 175	N/A	Voluntary and Community Organisations	Justified? There is no evidence that a purely residential scheme is deliverable nor is it the most appropriate strategy for the site. Potential viability issue for residential led scheme ~~note Vistry proposal that failed~~	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 176	N/A	Voluntary and Community Organisations	Effective? - The removal of flexibility undermines the potential for successful delivery. The CHDT considers that a mixed-use approach for both the Riverside and Brunel Sites would create greater scope for partnership, cross-subsidy, and placemaking, enhancing the deliverability of the whole Interface Land scheme in real-world conditions. Our proposal for the Riverside and Brunel sites is to bring forward a heritage-led mixed-use development for the whole Interface Land consistent with the Council's Interface Land SPD	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 177	N/A	Voluntary and Community Organisations	Consistent with National Policy - The NPPF supports the regeneration of underused land within designated conservation areas through sustainable, mixed-use development, particularly where this enhances the understanding of conservation objectives, supports heritage assets and cultural vitality (Paragraphs 202,203 and 219 of the NPPF 2024). The Historic Dockyard is a designated heritage asset of national significance, and the Interface Land sits within its visual and contextual setting.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 178	N/A	Voluntary and Community Organisations	Vision for the Riverside and Brunel sites is to bring forward a heritage-led mixed-use development for the whole Interface Land consistent with the Council's Interface Land SPD	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 179	N/A	Voluntary and Community Organisations	See suggested amendment	14. Site Allocations	14.3 Heritage-led Sites	Paragraph 14.3.2	Para - 14.3.2 - add the following sentence at the end of the paragraph: "Any development proposals must meet the overriding test of complementing and enhancing the heritage significance and setting of the Historic Dockyard".	Yes	
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 18	N/A	Voluntary and Community Organisations	These [suggested amendments would]• Return the approach to the Riverside site to that which was described in the Regulation 18 draft, and which continues to be the approach to the Brunel Site • Correct the inconsistent approach to the Riverside and Brunel Sites which has been adopted without explanation since the Regulation 18 draft • Enable flexibility for delivery and respond to market reality • Better reflect the heritage and spatial context of the site Provide a sound and sustainable basis for long-term regeneration • Align with national policy aims for brownfield and heritage asset reuse	3. Spatial Development Strategy	3.2 Policies Map		Policies Map ID CCB25: Delete "Residential" and "circa 150"; replace with "Mixed - use" and "0".		
Email	E.45	File V	Chatham Historic Dockyard Trust	SDLP 180	N/A	Voluntary and Community Organisations	These [suggested amendments would]• Return the approach to the Riverside site to that which was described in the Regulation 18 draft, and which continues to be the approach to the Brunel Site • Correct the inconsistent approach to the Riverside and Brunel Sites which has been adopted without explanation since the Regulation 18 draft • Enable flexibility for delivery and respond to market reality • Better reflect the heritage and spatial context of the site Provide a sound and sustainable basis for long-term regeneration • Align with national policy aims for brownfield and heritage asset reuse	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites	1. Delete the reference to the Interface Land as a strategic heritage led housing allocation. 2. (a) Change to read "Combined site areas of the Riverside and Brunel Sites". (b) Delete "circa 150 new homes as part of" (e) Delete from "currently" to end of the sentence.	Yes	
Email	E.75	File L	Cherilea Smith	SDLP 290	N/A	Members of the Public	Suggests Article 4, which would then restrict the likes of HMO applications, as would not then be able to put LCDs in.	6. Housing	6.8 Houses of multiple occupation				
Email	E.89	File L	Christine Marsh	SDLP 316	N/A	Members of the Public	Concerns over reclassifying undeveloped land in Gravesham and Strood as Grey Belt, risking urban sprawl and loss of farmland. The land borders suburban and rural areas and is not previously developed. The reclassification contradicts NPPF definitions and undermines protections meant to preserve countryside and prevent inappropriate development.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1576	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1577	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1578	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1579	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				

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Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1580	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1581	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1582	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1583	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1584	N/A	Members of the Public	The Local Plan is unsound, risking environmental harm, biodiversity loss	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1585	N/A	Members of the Public	The plan threatens heritage, farmland, and wildlife.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment				
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1586	N/A	Members of the Public	Chatham Docks closure and business relocation plans raise further concerns.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1587	N/A	Members of the Public	Concern about health impacts due to overdevelopment on the Hoo Peninsula and Green Belt.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.29	File Q	Christine Peek	SDLP 1588	N/A	Members of the Public	Plan lacks legal compliance, infrastructure funding	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1542	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1543	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1544	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1545	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1546	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1547	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1548	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1549	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.26	File Q	Christopher Carr & Hilary Hosoman	SDLP 1550	N/A	Members of the Public	Concern about lack of conservation of valuable wildlife habitat	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.177	File J	Church Commissioners for England	SDLP 1124	Savills (Laura Eacott)	Developers or Agents	For sites HHH22 and HHH31 amend housing trajectory to c.1,880 from 1,700.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1125	Savills (Laura Eacott)	Developers or Agents	Note that an additional 1,320 homes will be delivered beyond 2041.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1126	Savills (Laura Eacott)	Developers or Agents	Site amendment required and reconsider the location of the secondary school in Figure 14 and provide further information in regards to forward funding to enable an early delivery	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Figure 14: Hoo St Werburgh and Chattenden Concept Plan	Amend figure 14 to accurately reflect the Hells Angels land		

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Email	E.177	File J	Church Commissioners for England	SDLP 1127	Savills (Laura Eacott)	Developers or Agents	Any safeguarded provision for a railway station should be limited to circumstances where it can be demonstrated to be justified and deliverable, consistent with the Council's evidence base. In the absence of such evidence, the allocation should focus on delivering alternative sustainable transport measures in the early phases of development.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1128	Savills (Laura Eacott)	Developers or Agents	Ensure that all sites benefitting from the strategic infrastructure improvements contribute to the IDP.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1129	Savills (Laura Eacott)	Developers or Agents	Amend Criterion 16 of the MLP to separate the different environmental considerations and provide further clarity for decision makers on how they should consider applications in regard to a Strategic Environmental Framework.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1130	Savills (Laura Eacott)	Developers or Agents	Provide further clarity in regard to the Green Infrastructure Strategy, in relation to: timeframes; contents, status and compatibility with other supplementary planning documents.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1131	Savills (Laura Eacott)	Developers or Agents	Development should be guided by the Concept Plan instead of incorporating additional complication through the introduction of a Hoo Planning Framework and Strategic Masterplan Development Framework. Should this Framework be progressed, further clarity is required in regard to the Hoo Planning Framework and Strategic Masterplan Development Framework, in relation to: timeframes; contents and status.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.177	File J	Church Commissioners for England	SDLP 1132	Savills (Laura Eacott)	Developers or Agents	Amend the Spatial Development Strategy of the MLP to remove reference to any land being safeguarded for a potential railway station in the Hoo Peninsula due to an insufficient evidence base.	3. Spatial Development Strategy	3.1 Overview				
Email	E.177	File J	Church Commissioners for England	SDLP 1133	Savills (Laura Eacott)	Developers or Agents	Include the housing requirement for Medway Council and the proposed trajectory for meeting it in the strategic housing policy of the MLP.	3. Spatial Development Strategy	3.1 Overview				
Email	E.177	File J	Church Commissioners for England	SDLP 1134	Savills (Laura Eacott)	Developers or Agents	Provide further clarity in regard to the Hoo Peninsula Strategic Environmental Programme, in relation to: timeframes; contents and interaction with live planning applications.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.177	File J	Church Commissioners for England	SDLP 1135	Savills (Laura Eacott)	Developers or Agents	Amend Policy S2 to ensure consistency between the Hoo Peninsula Strategic Environmental Programme and the emerging Kent and Medway Local Nature Recovery Strategy.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.177	File J	Church Commissioners for England	SDLP 1136	Savills (Laura Eacott)	Developers or Agents	Policy T3: Clarify that a lower level of affordable housing would be acceptable should the viability assessment demonstrate the policy level provision is not achievable. Clarify as to whether all PDL sites require 10% affordable housing provision or just PDL sites in lower value areas. Allocate more greenfield sites in order to prevent a shortfall of affordable housing provision should this be a concern for the Council. Different value areas should be clearly defined and mapped in the MLP to avoid any ambiguity.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing			
Email	E.177	File J	Church Commissioners for England	SDLP 1137	Savills (Laura Eacott)	Developers or Agents	Amend to remove the requirement to offer unsold custom and self-build plots to the local authority for affordable housing and instead allow the unsold plots to be returned to the developer as market housing.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email	E.177	File J	Church Commissioners for England	SDLP 1138	Savills (Laura Eacott)	Developers or Agents	Remove the safeguarded transport land in site allocations HHH22 and HHH31 on the North West Policies Map. The land is already indicatively shown in Figure 14 of the MLP and does not require duplication in policy.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - North West			
Email	E.177	File J	Church Commissioners for England	SDLP 1139	Savills (Laura Eacott)	Developers or Agents	Policy S22- amend to provide further clarity relating to: the location of the centres Amend proposed phasing of the centres; the funding plan; the evidence base to inform the specific service needs; and consistency with Figure 14 of the MLP.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Email	E.177	File J	Church Commissioners for England	SDLP 1140	Savills (Laura Eacott)	Developers or Agents	DM17 - Medway Council should reconsider the need for land to be safeguarded for a potential railway station on the Land East of Roper's Lane. Should there prove to be a demonstrable need and suitable mechanism for the delivery of a railway station on the Land East of Roper's Lane, then a fall back position should be introduced to allow alternative land uses should the railways station not be delivered within a reasonable timeframe.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch			
Email	E.177	File J	Church Commissioners for England	SDLP 1141	Savills (Laura Eacott)	Developers or Agents	The Commissioners supports the allocation of the Land at The Street, Stoke for up to 10 homes. Should Medway Council require any additional residential sites to meet its housing needs or support further development on small sites, sites AS13, AS16, AS21, AS29 and HHH28 are all available, suitable and achievable for residential development.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements			

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Email	E.177	File J	Church Commissioners for England	SDLP 1142	Savills (Laura Eacott)	Developers or Agents	SA6 -Amend Figure 12 of the MLP to remove the heritage buffer proposed in the Land West of Strood Concept Plan. Amend the key to Figure 12 to clarify that the breaks in built form will comprise green space and planting. Provide evidence to justify the need for an 8-FE secondary school to be delivered on the Land West of Strood.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.177	File J	Church Commissioners for England	SDLP 1143	Savills (Laura Eacott)	Developers or Agents	SA14 amend so that site HHH35 can be delivered earlier in the plan period and is not reliant on the delivery or occupation of any previously developed land.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Email	E.177	File J	Church Commissioners for England	SDLP 1144	Savills (Laura Eacott)	Developers or Agents	Para. 6.1.2 Include Medway Council's housing requirement and proposed housing trajectory within a strategic policy of the MLP.	6. Housing	6.1 Introduction	Paragraph 6.1.2			
Email	E.177	File J	Church Commissioners for England	SDLP 1145	Savills (Laura Eacott)	Developers or Agents	Site AS13, AS21 and HHH28 – allocate for residential development as a main modification to ensure Medway Council meets its housing needs in the proposed plan period.	14. Site Allocations	14.12 Rural Settlements				
Email	E.177	File J	Church Commissioners for England	SDLP 1146	Savills (Laura Eacott)	Developers or Agents	Site AS16 and site AS29 – allocate for residential development as a main modification to ensure Medway Council meets its small site requirement and ensure the appropriate delivery of housing in the first five years of the plan period.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.177	File J	Church Commissioners for England	SDLP 1147	Savills (Laura Eacott)	Developers or Agents	Land West of Strood Concept Plan - Amend Figure 12 of the MLP to remove the heritage buffer proposed.	14. Site Allocations	14.7 Strood West	Figure 12: Land West of Strood Concept Plan			
Email	E.177	File J	Church Commissioners for England	SDLP 1148	Savills (Laura Eacott)	Developers or Agents	Evidence is required to justify the need for an 8-FE secondary school to be delivered on the Land West of Strood as this substantially exceeds the proposals' own demands.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Online	1590	Online (OPUS)	Churches Together in Medway (Mr Stephen Bello, Chairman) [1590]	4561	N/A	Voluntary and Community Organisations	Support for provision of churches for worship as well as social interaction.	1. Overview	1.2 Medway area	Paragraph 1.2.2			
Online	1590	Online (OPUS)	Churches Together in Medway (Mr Stephen Bello, Chairman) [1590]	4562	N/A	Voluntary and Community Organisations	Support for housing with infrastructure.	1. Overview	1.2 Medway area	Paragraph 1.2.8			
Online	1590	Online (OPUS)	Churches Together in Medway (Mr Stephen Bello, Chairman) [1590]	4565	N/A	Voluntary and Community Organisations	Support for business development in Local Plan to retain local talent across age groups.	1. Overview	1.2 Medway area	Paragraph 1.2.9			
Online	1590	Online (OPUS)	Churches Together in Medway (Mr Stephen Bello, Chairman) [1590]	4566	N/A	Voluntary and Community Organisations	Concern over lack of emphasis on social cohesion in Local Plan.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.4			
Email	E.114	File B	Churchill Living and McCarthy Stone	SDLP 483	Planning Issues (Lauren Bishop)	Developers or Agents	Given the above findings from both the Viability Study (dated 2025) published as part the Local Plan evidence, emerging policies from Local Planning Authorities, and the RHG Briefing Note, we respectfully request that the older persons housing typology and costings are re-run as part of a revised viability study. This will ensure the findings are conclusive to real world cases where older persons housing is unable to deliver affordable housing.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.114	File B	Churchill Living and McCarthy Stone	SDLP 484	Planning Issues (Lauren Bishop)	Developers or Agents	As such, we recommend the following addition to emerging Policy T3: "The Viability Study concludes that affordable housing is not viable for older persons and specialist housing on Brownfield sites. Therefore, Policy T3 does not apply to specialist housing or older persons housing on Brownfield sites"	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	As such, we recommend the following addition to emerging Policy T3: "The Viability Study concludes that affordable housing is not viable for older persons and specialist housing on Brownfield sites. Therefore, Policy T3 does not apply to specialist housing or older persons housing on Brownfield sites"		
Email	E.114	File B	Churchill Living and McCarthy Stone	SDLP 485	Planning Issues (Lauren Bishop)	Developers or Agents	Given the pertinent need for older persons housing as set out in the recently published Local Housing Needs Assessment (February 2025), we would suggest the proposed wording of Policy T4 does not go far enough in supporting the delivery of older persons housing. We therefore recommend additions (column AG).	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Meets a proven need for that particular type of accommodation. In respect of older person housing, proposals will be supported where they seek to deliver sheltered housing/retirement housing and extra care housing/ supported living housing...As per the latest LHNA (2025), the Council are required to deliver an additional 2,784 units of specialist accommodation for older person households up until 2041."		
Email	E.73	File L	Claire Burton	SDLP 288	N/A	Members of the Public	Suggest that Medway Council should commit to the Article 4 direction to ensure that the houses are protected from becoming a mass of HMO's in an already congested area.	6. Housing	6.8 Houses of multiple occupation				
Email	E.19	File L	Claire Glover	SDLP 46	N/A	Members of the Public	Object to Policy SA6 and development on Green Belt.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.19	File L	Claire Glover	SDLP 47	N/A	Members of the Public	Air pollution, noise pollution and light pollution will be heavily affected	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light		No	
Email	E.19	File L	Claire Glover	SDLP 48	N/A	Members of the Public	Duty to cooperate process has not been in the public eye	1. Overview	1.4 Duty to Cooperate			No	
Email	E.19	File L	Claire Glover	SDLP 49	N/A	Members of the Public	Major safety and health concerns regarding Live Oil Fuel pipeline that feeds Gatwick Airport and asks if who insures the pipeline has been made aware of the Local Plan?	13. Energy	13.2 Energy supply			No	

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Email	E.19	File L	Claire Glover	SDLP 50	N/A	Members of the Public	Inadequate infrastructure including on roads, public transport, shopping facilities, utilities (gas, sewage, electricity, water), flood defences, healthcare and schools.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Email	E.66	File L	Cliff Webb	SDLP 269	N/A	Members of the Public	Objects to reclassification of green belt to grey belt (Strood).	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4			
Email	E.66	File L	Cliff Webb	SDLP 270	N/A	Members of the Public	Objects to reclassification of green belt to grey belt (Strood).	14. Site Allocations	14.7 Strood West				
Email	E.66	File L	Cliff Webb	SDLP 271	N/A	Members of the Public	Queries impact of development on road and health infrastructure (Strood).	14. Site Allocations	14.7 Strood West				
Email	E.66	File L	Cliff Webb	SDLP 272	N/A	Members of the Public	Potential increase in crime - development of that area will give easier access to the rear of my property (Brompton Farm Road).	14. Site Allocations	14.7 Strood West				
Email	E.133	File R	Cliffe and Cliffe Woods Parish Council	SDLP 738	N/A	MPs, Members and Parish Councils	Stress the need for balanced development, improved infrastructure, especially with developments impact on traffic.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.133	File R	Cliffe and Cliffe Woods Parish Council	SDLP 739	N/A	MPs, Members and Parish Councils	Cliffe and Cliffe Woods Parish Council welcomes the Local Plan after years of uncertainty however have concerns around the legal and policy concerns, urging stronger alignment with the Neighbourhood Plan and more relevance to Cliffe and Cliffe Woods.	1. Overview	1.3 How the plan has been prepared				
Email	E.133	File R	Cliffe and Cliffe Woods Parish Council	SDLP 740	N/A	MPs, Members and Parish Councils	Stresses need for noting past disruptions and limited local benefits from recent developments, in particular community wellbeing.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.133	File R	Cliffe and Cliffe Woods Parish Council	SDLP 741	N/A	MPs, Members and Parish Councils	Environmental concerns are overlooked, and key policies ignored. Request deletion of site SR4 and seek involvement in the examination to ensure local needs are addressed.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	Request deletion of site SR4		
Email	E.133	File R	Cliffe and Cliffe Woods Parish Council	SDLP 742	N/A	MPs, Members and Parish Councils	Opportunity to extend PROW on developments to the south of Cliffe Woods have been missed.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email	E.187	File R	Cllr Alex Hyne & Cllr Robbie Lammas	SDLP 1239	N/A	MPs, Members and Parish Councils	Capstone Valley - loss as a green buffer, destroying landscape contrary to aim of protecting green infrastructure. Impact on quality of life – change to setting of Princes Park. Lack of infrastructure – plan fails to demonstrate sufficient facilities to support increased population. Failure to meet legal compliance requirements for evidence and consultation – inadequate evidence base to reflect cumulative impacts of development. Contradicts national policy objectives on climate change and biodiversity – development will destroy habitats, reduce biodiversity increase carbon emissions....	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Remove Capstone Valley allocations Conduct infrastructure capacity study for Princes Park and surrounding wards Undertake community engagement with Princes Park residents to identify sustainable options Prioritise brownfield development and urban regeneration...avoid loss of agricultural land and greenfield land.		
Email	E.5	File R	Cllr George Perfect	SDLP 10	N/A	MPs, Members and Parish Councils	This plan will significantly change the face of our five towns and the Peninsula. It will see massive change to all areas of Medway, and we worry it is not considering the change of communities in the whole. Loss of green spaces.	2. Vision and Strategic Objectives	2.1 Vision				
Email	E.5	File R	Cllr George Perfect	SDLP 12	N/A	MPs, Members and Parish Councils	Pressure on our already overwhelmed utilities services, the plan is not built on infrastructure that will deliver for the long term.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.5	File R	Cllr George Perfect	SDLP 8	N/A	MPs, Members and Parish Councils	There are significant challenges that our local healthcare services face. A GP crisis, a hospital with aging infrastructure in desperate need of a long-term plan, and a lack of community services for our people. Adding potentially more than a further 50,000 residents to this, without a clear plan or any investment from the government, will put our critical medical infrastructure in an even more precarious state.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.5	File R	Cllr George Perfect	SDLP 9	N/A	MPs, Members and Parish Councils	Local plan fails to deliver a long transport plan, without plans for key critical junctions, roads that are already over capacity, and a railway network creaking and in urgent need of investment. There are currently no plans for any significant infrastructure investment from the new Government.	9. Transport	9.1 Vision for access and movement in Medway				
Email	E.5	File R	Cllr George Perfect	SDLP11	N/A	MPs, Members and Parish Councils	Significant concern with your failure to protect the Chatham Docks, which you promised to protect in opposition, along with the significant amounts of development across Capstone and the Hoo Peninsula.	3. Spatial Development Strategy	3.1 Overview				
Email	E.41	File R	Cllr Ron Sands	SDLP 127	N/A	MPs, Members and Parish Councils	Loss of high-grade agricultural land, harming rural economy and food production.	7. Economic Development	7.8 Rural economy				
Email	E.41	File R	Cllr Ron Sands	SDLP 128	N/A	MPs, Members and Parish Councils	31% of Medway's housing growth proposed in one rural area.	3. Spatial Development Strategy					
Email	E.41	File R	Cllr Ron Sands	SDLP 129	N/A	MPs, Members and Parish Councils	Disregard of the Hoo St Werburgh & Chattenden Neighbourhood Plan, which had strong public support.	1. Overview	1.2 Medway area	Paragraph 1.2.11			
Email	E.41	File R	Cllr Ron Sands	SDLP 130	N/A	MPs, Members and Parish Councils	Plan unsound, poor and legally questionable consultation process.	1. Overview	1.3 How the plan has been prepared				

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Email	E.41	File R	Cllr Ron Sands	SDLP 131	N/A	MPs, Members and Parish Councils	Plan unsound, poor and legally questionable consultation process. Disregard of the Hoo St Werburgh and Chattenden Neighbourhood Plan, which had strong public support.	1. Overview	1.3 How the plan has been prepared				
Email	E.41	File R	Cllr Ron Sands	SDLP 132	N/A	MPs, Members and Parish Councils	Threat to Kingsnorth employment site's viability due to traffic congestion. Plan unsound, poor and legally questionable consultation process. Disregard of the Hoo St Werburgh & Chattenden Neighbourhood Plan, which had strong public support.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision			
Email	E.41	File R	Cllr Ron Sands	SDLP 133	N/A	MPs, Members and Parish Councils	Policy SA8 -Contradictory objectives and lack of clarity/deliverability. Urbanisation of rural areas conflicts with local character and planning goals. Strategic separation between Hoo and Chattenden undermined. Master planning lacks public support, top-down approach criticised. Over reliance on undeliverable infrastructure promises.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.41	File R	Cllr Ron Sands	SDLP 134	N/A	MPs, Members and Parish Councils	Sustainability Appraisal- Hoo Peninsula growth is the most harmful and least sustainable option. Impact matrix shows negative effects across multiple environmental and social indicators. Alternative, more balanced options were not properly considered.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.41	File R	Cllr Ron Sands	SDLP 135	N/A	MPs, Members and Parish Councils	Infrastructure (transport, utilities) inadequate and not addressed properly.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Online	1155	Online (OPUS)	CPRE Kent [1155]	4596	N/A	Voluntary and Community Organisations	Revision needed to policy SA10 revised to address concerns around land quality, density, landscape, and transparency in housing delivery. * Object to Lower Rainham - loss of best and most versatile land. Loss of BMV is not properly evidenced and inconsistent with the NPPF * Concerns about effects on land connected to SPA and Ramsar sites. * Development could harm the rural character and tranquil environment. * 30dha is considered inappropriate for a site transitioning from rural to urban. urban densities of 60-120 (National design code) is appropriate. * clarification needed on yield * Landscape led needs to be consistently applied * Argues against sacrificing greenfield land to meet external market demand.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Delete allocation. Increase yield on other sites to meet housing need.	Yes	To underline the importance of a true brownfield first strategy and where greenfield sites are to be allocated that density (and affordable housing provision) is optimised
Online	1155	Online (OPUS)	CPRE Kent [1155]	4609	N/A	Voluntary and Community Organisations	Stand alone policy for loss of agricultural lane is needed.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy	Reference should be made to agriculture and the contribution it makes to the rural economy.	Yes	To underline the contribution that agricultural land makes to the economy.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4610	N/A	Voluntary and Community Organisations	Pedestrian crossing over the A228 - not in the IDP, how would cyclists cross over?	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites		Yes	To underline the importance of sustainable development.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4611	N/A	Voluntary and Community Organisations	* CPRE Kent questions whether new local/rural centres will be truly sustainable, particularly regarding accessibility by walking, cycling, or public transport. * Pedestrian crossing over the A228 - not in the IDP, how would cyclists cross over?	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy		Yes	To underline the importance of sustainable development.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4612	N/A	Voluntary and Community Organisations	* CPRE Kent questions whether new local/rural centres will be truly sustainable, particularly regarding accessibility by walking, cycling, or public transport. * Pedestrian crossing over the A228 - not in the IDP, how would cyclists cross over?	8. Retail and Town Centres	8.3 Hierarchy of centres	Policy S16: Hierarchy of centres		Yes	To underline the importance of sustainable development.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4613	N/A	Voluntary and Community Organisations	* Unsound development strategy * Impact of new shopping facilities and associated housing in expense of the environment.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula	Cross-referenced with the concept plan at figure Yes4/policy SA8.	Yes	To underline the importance of sustainable development.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4614	N/A	Voluntary and Community Organisations	* will the grain branch line result in modal shift? * IDP gaps - rail schemes?	9. Transport	9.4 Grain branch	Policy DM17: Grain Branch		Yes	To underline the importance of sustainable travel options in the context of land allocated under SA8
Online	1155	Online (OPUS)	CPRE Kent [1155]	4615	N/A	Voluntary and Community Organisations	* reference Fast Track in policies SA6 and SA8	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Rename policy to make its purpose clearer and cross reference it to the Fast Track services mentioned in policies SA6 and SA8.	Yes	To underline the importance of sustainable travel options.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4616	N/A	Voluntary and Community Organisations	* no mention of solar energy supply or criteria for planning applications.	13. Energy	13.2 Energy Supply	Policy S25: Energy Supply	Amend policy to make reference to solar panels and the need avoid siting them on green belt and BMV.	Yes	To underline the importance of not allowing renewables to swamp and transform the character of rural places.

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Online	1155	Online (OPUS)	CPRE Kent [1155]	4617	N/A	Voluntary and Community Organisations	* protect BMV land - including Green Belt and land of Local Landscape importance * premature reclassification of GB in advance of Gravesham BC proposals at Chapter Farm. * Brownfield first approach is not evidenced * * 30dha is considered inappropriate for a site transitioning from rural to urban. urban densities of 60-120 (National design code) is appropriate. * clarification needed on yield * clarify landscape led	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Delete allocation. Increase yield on other sites to meet housing need.	Yes	To underline the importance of a true brownfield first strategy and where greenfield sites are to be allocated that density (and affordable housing provision) is optimised.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4618	N/A	Voluntary and Community Organisations	* Properly evidence BMV land loss, * Apply appropriate urban densities, * Clarify landscape and ecological strategies, * Improve transparency in housing delivery assumptions.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Delete allocation. Increase yield on other sites to meet housing need.	Yes	To underline the importance of a true brownfield first strategy and where greenfield sites are to be allocated that density (and affordable housing provision) is optimised.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4619	N/A	Voluntary and Community Organisations	CPRE Kent considers the allocation at Hoo and Chattenden to be unsound, ineffective, and inconsistent with national policy, unless significant changes are made to address environmental, transport, and housing concerns. CPRE Kent considers Policy SA8 to be inconsistent with national policy and ineffective, due to: Poor land use efficiency, Infrastructure delivery risks, Environmental harm, Lack of clarity and transparency in housing and transport planning.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Delete allocation. Increase yield on other sites to meet housing need.	Yes	To underline the importance of a true brownfield first strategy and where greenfield sites are to be allocated that density (and affordable housing provision) is optimised.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4620	N/A	Voluntary and Community Organisations	* clarification needed on affordable housing requirement in urban area as opposed to the 30% AH requirement * Policy T3 should be amended to include reference to a higher AH requirement to be consistent with the Golden rules	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	Policy should be consistent with the NPPF. Provision should be amended to 30%. Golden Rules should be defined (in connection with policy SA6).	Yes	To underline the importance of affordable housing provision.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4621	N/A	Voluntary and Community Organisations	Policies S2 (Conservation and Enhancement of the Natural Environment) and DM4 should be amended to specifically make reference to the dark skies/tranquillity mapping project work undertaken by CPRE	4. Natural Environment	4.11 Noise and light pollution	Paragraph 4.11.1	Changes to align with those adopted in the Swale and Ashford local plans.	Yes	To underline the importance of dark skies and tranquillity to the natural world and our own natural rhythms.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4622	N/A	Voluntary and Community Organisations	Policies S2 (Conservation and Enhancement of the Natural Environment) and DM4 should be amended to specifically make reference to the dark skies/tranquillity mapping project work undertaken by CPRE	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Changes to align with those adopted in the Swale and Ashford local plans.	Yes	To underline the importance of dark skies and tranquillity to the natural world and our own natural rhythms.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4623	N/A	Voluntary and Community Organisations	Policies S2 (Conservation and Enhancement of the Natural Environment) and DM4 should be amended to specifically make reference to the dark skies/tranquillity mapping project work undertaken by CPRE	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light	Changes to align with those adopted in the Swale and Ashford local plans.	Yes	To underline the importance of affordable housing provision dark skies and tranquillity to the natural world and our own natural rhythms.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4624	N/A	Voluntary and Community Organisations	* Various comments on the Local Plan document structure and presentation: Suggestions for Improvement Reordering: Strategic policies (especially housing, employment) should appear earlier. Cross-Referencing: Add links between spatial strategy and site allocations (e.g., paragraphs 3.1.1, 3.1.10, and 3.1.9 to SA6). Terminology Consistency: Use "site allocation policies" or "strategic allocations" consistently. Policy Index: Include a comprehensive index for easier navigation. Map Enhancements: Improve clarity, accessibility, and	1. Overview	1.2 Medway area	Paragraph 1.2.1	Reordering: Strategic policies (especially housing, employment) should appear earlier. Cross-Referencing: Add links between spatial strategy and site allocations (e.g., paragraphs 3.Yes.Yes, 3.Yes.Yes0, and 3.Yes.9 to SA6). Terminology Consistency: Use "site allocation policies" or "strategic allocations" consistently. Policy Index: Include a comprehensive index for easier navigation. Map Enhancements: Improve clarity, accessibility, and integration with policy references.	Yes	To underline the importance of a true brownfield first strategy and the need for a user-friendly document.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4625	N/A	Voluntary and Community Organisations	* support the vision * is the strategy sufficiently clear in terms of addressing climate change, strengthening natural assets or that housing and economic needs are met?	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041	Cross-Referencing: Add links between spatial strategy and site allocations (e.g., paragraphs 3.Yes.Yes, 3.Yes.Yes0, and 3.Yes.9 to SA6).	Yes	To underline the importance of a user-friendly document.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4626	N/A	Voluntary and Community Organisations	The policies maps are not readily accessible/understandable, therefore making the LP not legally compliant.	3. Spatial Development Strategy	3.2 Policies Map	Paragraph 3.2.1	Terminology Consistency: Use "site allocation policies" or "strategic allocations" consistently.	Yes	To underline the importance of the need for a user-friendly document.

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Online	1155	Online (OPUS)	CPRE Kent [1155]	4627	N/A	Voluntary and Community Organisations	* It is CPRE Kent's overall view that the strategic objectives are largely positive with a strong emphasis on the need to conserve and enhance the natural, built and historic environment, which aligns with CPRE Kent's goal of protecting the countryside. * Also consider the impacts of transport infrastructure on the environment. * will the Grain branch result in modal shift? * calls for proactive policies to expand carbon-storing habitats and support retrofitting of existing buildings.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable	Policy Index: Include a comprehensive index for easier navigation.	Yes	To underline the importance of brownfield first.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4628	N/A	Voluntary and Community Organisations	* objectives should have a greater emphasis on developing brownfield land over greenfield *LAA did not undertake a specific brownfield land call for sites like other authorities. Therefore is not justified in terms of being based on proportionate evidence base.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 2: Supporting people to lead healthy lives and strengthening our communities	Map Enhancements: Improve clarity, accessibility, and integration with policy references.	Yes	Undertake a targeted call for brownfield sites.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4629	N/A	Voluntary and Community Organisations	* Do not support strategy which places such a reliance on Greenfield land. * LP is not based on proportionate evidence and therefore unsound * The amazing environmental and ecological features in Hoo should be celebrated	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3	Undertake a targeted call for brownfield sites.	Yes	Undertake a targeted call for brownfield sites.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4630	N/A	Voluntary and Community Organisations	* concerned that much of identified land is best and most versatile agricultural land - not consistent with national policy *unclear what measures have been put in place in protecting or minimising BMV land. * provide realistic alternative to car dependency * protect and expand on open space provision * densities not compliant with national design code * more benefits come with higher densities - necessary infrastructure.	3. Spatial Development Strategy			Undertake a targeted call for brownfield sites and set out sequential measures that have been undertaken to minimise loss of BMV.	Yes	To underline the importance of brownfield first and protected BMV.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4631	N/A	Voluntary and Community Organisations	* Hoo should not be allocated for substantial housing development beyond that needed to support existing communities. * strongly object to the policy SA8: - contains significant environmental constraints - contains the best and most versatile land - has significant areas of intrinsically dark skies - ecology is sensitive - AQMA designation at Four Elms and Peninsula Way (object to car dependency) For development to be considered acceptable: * sustainable * self-contained * sustainable transport options (Zero-emission dedicated buses) * No mention of Fast track in the spatial strategy text but has been tested in the STA. * policy hook (Hoo) on modal shift requirements need to be more clearly defined to be effective. * Brownfield land approach needed * increase densities to 60-120dph (national design code) * Object to policy SA8	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.6	Undertake a targeted call for brownfield sites and set out sequential measures that have been undertaken to minimise loss of BMV.	Yes	To underline the importance of brownfield first, protecting BMV and impacts on the natural world.
Online	1155	Online (OPUS)	CPRE Kent [1155]	4632	N/A	Voluntary and Community Organisations	* Spatial development strategy should be amended to indicate quantum of development * Unclear what transport infrastructure is proposed for site allocations * what does transport infrastructure include? * Para 2 should cross reference Fast Track * SA comments that Hoo is worst performing but two of the largest sites could not expect completion by 2041 (LW8 and SM16) * Fast track is not identified by the evidence	3. Spatial Development Strategy			Undertake a targeted call for brownfield sites and set out sequential measures that have been undertaken to minimise loss of BMV. Retain green belt.	Yes	To underline the importance of brownfield first, protecting BMV, safeguarding the green belt, and likely impact of development on the natural world.

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Email	E.64	File R	Cuxton Parish Council	SDLP 263	N/A	MPs, Members and Parish Councils	Cuxton Parish Council note the inclusion of Port Medway Marina as a potential housing site in the Rural Settlements allocation. Whilst no challenge is made on any of the grounds above, Cuxton Parish Council wish to make their representation, at this stage, to say that this site is in a flood plain and they have concerns about housing here for safety reasons. There are also concerns about access. Access and egress via Station Road, will not only have to contend with the level crossing, but will place significantly more strain on the junction to the A228. Access via Medway Valley Park would be a more suitable solution. The Parish Council will, however, give their detailed feedback and opinion on this matter during the formal planning application process, if and when one is instigated.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		No	
Email	E.105	File L	Cyril Champness	SDLP 450	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Email	E.105	File L	Cyril Champness	SDLP 451	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.105	File L	Cyril Champness	SDLP 452	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Email	E.105	File L	Cyril Champness	SDLP 453	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.105	File L	Cyril Champness	SDLP 454	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.105	File L	Cyril Champness	SDLP 455	N/A	Members of the Public	Preserving green spaces and farmland is vital for food security, biodiversity, and wellbeing.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email	E.105	File L	Cyril Champness	SDLP 456	N/A	Members of the Public	Housing should focus on urban areas with transport links.	9. Transport					
Email	E.105	File L	Cyril Champness	SDLP 457	N/A	Members of the Public	Countryside must be protected for future generations' health and sustainability.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email	E.105	File L	Cyril Champness	SDLP 476	N/A	Members of the Public	Infrastructure is overstretched, causing pollution and service strain.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.105	File L	Cyril Champness	SDLP 477	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Email	E.105	File L	Cyril Champness	SDLP 478	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Email	E.105	File L	Cyril Champness	SDLP 479	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1765	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1766	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1767	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1768	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1769	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1770	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1771	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.49	File Q	D & H Sellwood	SDLP 1772	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				

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Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1612	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1613	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1614	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1615	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1616	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1617	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1618	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1619	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1620	N/A	Members of the Public	The Plan proposes 6,700 homes on the Hoo Peninsula, adding 13,000 cars to an already congested single access road.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1621	N/A	Members of the Public	Rushed preparation, economic risks from business closures, and inadequate planning make the proposal unsound and harmful to residents and the environment.	7. Economic Development					
Hoo Peninsula Campaign (Additional responses)	H.32	File Q	D A Laphorn	SDLP 1622	N/A	Members of the Public	Lacks solutions for traffic, infrastructure, and services.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.1	File L	D Ambrose	SDLP 1	N/A	Members of the Public	Regarding retaining existing Gypsy sites, there must be a supply of adequate facilities to the Gypsy site in Meresborough Road, as water supply lacks.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople			
Email	E.112	File L	D Bennett	SDLP 479	N/A	Members of the Public	Concern about underuse of brownfield sites and use of high productive agricultural land. Concern about Chatham Docks	7. Economic Development					
Email	E.112	File L	D Bennett	SDLP 480	N/A	Members of the Public	Concern about underuse of brownfield sites and use of high productive agricultural land.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1641	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1642	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1643	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1644	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1645	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1646	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1647	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			

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Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1648	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.35	File Q	Daphne Fritter	SDLP 1649	N/A	Members of the Public	Concern about development with lack of infrastructure (particular concern about road network)	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1441	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1442	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1443	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1444	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1445	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1446	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1447	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1448	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.15	File Q	David & Elaine Leggatt	SDLP 1449	N/A	Members of the Public	Concern about climate change impacts, lack of water, investment in the water systems and lack of infrastructure, particularly transport on the Peninsula.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1756	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1757	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1758	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1759	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1760	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1761	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1762	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1763	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Hoo Peninsula Campaign (Additional responses)	H.48	File Q	David & Nina Weatherley	SDLP 1764	N/A	Members of the Public	Concern over withdrawal of plans for a new train station at Sharnel street	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.70	File L	David Constable	SDLP 285	N/A	Members of the Public	Urge Medway Council to implement Article 4 Directions to safeguard communities from the detrimental effects of Lawful Development Certificate (LDC) applications being used to bypass planning permission e.g. converting C3 to HMO, C4 use. Examples given of negative impact on residents, how Article 4 Directions would protect residents and recommendations for implementing Article 4 Directions effectively also given.	6. Housing	6.8 Houses of multiple occupation			No	
Hard copy	H.7	File N	David Rutt	SDLP 1380	N/A	Members of the Public	DTC provides insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hard copy	H.7	File N	David Rutt	SDLP 1381	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hard copy	H.7	File N	David Rutt	SDLP 1382	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.7	File N	David Rutt	SDLP 1383	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.7	File N	David Rutt	SDLP 1384	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hard copy	H.7	File N	David Rutt	SDLP 1385	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hard copy	H.7	File N	David Rutt	SDLP 1386	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hard copy	H.7	File N	David Rutt	SDLP 1387	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.138	File E	Dean Lewis Estates (Cliffe Woods)	SDLP 763	N/A	Developers or Agents	A modification to site allocations required to include Land at Merry boys Rd Cliffe Woods. To be identified as 'reserve site'. A contingency policy should be included to aid the maintain housing land supply and housing throughout the plan period delivery.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		Yes	The Local Plan policies as expressed do not provide for any contingency should the housing delivery across the plan area be delayed and fall short of the rolling five-year housing land supply requirements. Additional land should be identified in the plan to ensure avoidance of this potential issue. The LP requires a modification in this regard to make the Local Plan 'sound'
Email	E.138	File E	Dean Lewis Estates (Cliffe Woods)	SDLP 764	N/A	Developers or Agents	Noting brownfield first approach, distribution of allocations 40% urban/30% suburban/30% rural and small buffer. Noting difficulty of delivering on brownfield sites.	3. Spatial Development Strategy	3.1 Overview			Yes	The Local Plan policies as expressed do not provide for any contingency should the housing delivery across the plan area be delayed and fall short of the rolling five-year housing land supply requirements. Additional land should be identified in the plan to ensure avoidance of this potential issue. The LP requires a modification in this regard to make the Local Plan 'sound'

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Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 755	N/A	Developers or Agents	DLE requires the commissioning and publication of a Medway-wide Monitor and Management Mitigation Strategy before submitting the Local Plan for examination consider that the publication of the Medway-wide Monitor and Management Mitigation Strategy is therefore a fundamental component of evidence necessary to complete the Infrastructure Delivery Plan and related Local Plan Viability Assessment.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 756	N/A	Developers or Agents	In the context of Hoo St Werburgh and Chattenden policy SA8 - 'Objective 3' requires that "The separation of Hoo and Chattenden as distinct settlements will be secured through a strategic landscape corridor". Further, the supporting text to policy SA8 states that, "In planning for Medway's future growth, it is important to ensure the distinct identities of Hoo and Chattenden. Development must retain the separation of the historic villages of Hoo and Chattenden and avoid coalescence. A landscape buffer is a key part of the strategic planning, providing for views over open landscape ".DLE Object to this wording in the policy and reasoned justification as it is too prescriptive and does not acknowledge the presence of the strategic Transport Corridor (A228 – Peninsula Way) which runs straight the location where a 'Strategic Landscape Corridor' is	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	The Term 'strategic landscape corridor' should be removed for the policy. Policy SA8: Hoo St Werburgh and Chattenden – Objectives – 3 – "The existing separation of Hoo and Chattenden as distinct settlements will be maintained and supplemented having regard to the existing roads and landscape features. Where appropriate additional landscape buffers will be introduced to retain the existing separation between the settlements.	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local Plan 'sound'.
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 757	N/A	Developers or Agents	Criteria 6 - DLE consider that the phasing strategy will need to be prepared as per Criteria 12 and is required to be completed prior to submission of the Local plan for Examination.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Further evidence required.	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 758	N/A	Developers or Agents	DLE also object to the wording of Criteria 5 - needs amending suggest that the policy wording be modified.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Criteria 5 - amendment (add text in bold/take out greyed out text) "Development will come forward in general accordance with a Hoo St Werburgh and Chattenden Concept Plan strategic masterplan for Hoo and Chattenden, providing a framework for design, landscape and green infrastructure, heritage, services, employment, transport, infrastructure, defining distinctive neighbourhoods and centres".	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 759	N/A	Developers or Agents	Criteria 8 -This policy must be read in conjunction with Policy T17, sets of thresholds of 280sqm for convenience retaining. DLE object to Criteria 8 and Policy T17 in its current form. National Planning Retail Group definition of 'net sales area'.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	The following description from the National Planning Retail Group should be cited in the supporting text to the policy. "The area within the walls of the shop or store to which the public has access or from which sales are made, including display areas, fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, areas occupied by retail concessionaires, customer services areas, and internal lobbies in which goods are displayed; but not including cafes and customer toilets."	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 760	N/A	Developers or Agents	Criteria 19 - states that a strategic environmental management plan will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the natural environment around Hoo and Chattenden, particularly the SPA, Ramsar sites and SSSIs. DLE will contribute land that will enable delivery of Cockham Community Parkland Hoo Wetlands.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Require a modification to Criteria 19 which recognises that where on site provision of land and interventions is made by the developer in this regard the equivalent S106 contributions will be reduced by a commensurate amount.	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local

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Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 761	N/A	Developers or Agents	Criteria 15 - [It] is incumbent on the council to ensure that the implementation of the highway interventions is coordinated in such a way to aid the timely delivery of new homes and infrastructure. The publication of the Medway-wide Monitor and Management Mitigation Strategy prior to the submission of the Local plan for examination will be an essential tool in assisting in the phasing of highway interventions and realising development accordingly.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.137	File E	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	SDLP 762	N/A	Developers or Agents	DLE objection - the site (allocation of land for residential east of Vicarage Lane) is highly sustainable given its proximity to Hoo Village centre and all its attendant facilities. It is acknowledged that the land is within Flood Zone 2, but this is defended Flood Plain and not liable to flooding and therefore passes the sequential test.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - North West	A minor Modification if required to depict the allocation of land for residential east of Vicarage Lane in accordance with the 'Figure 14: Hoo St Werburgh and Chattenden Concept Plan'.	Yes	DLE have interests in major land holdings proposed as housing and mixed-use allocations within the plan area, particularly on the Hoo Peninsula. The policies as expressed require modifications to make the Local
Email	E.141	File E	Dean Lewis Estates (Rainham)	SDLP 768	N/A	Developers or Agents	Specific regard to Residential Development at Meresborough Road, Rainham. The site has not been selected for allocation but is sustainable in its own right and, if needed, would supplement the delivery of housing in the early part of the Local Plan period. For these reasons it should be identified as 'Reserve site' .	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		Yes	The Local Plan policies as expressed do not provide for any contingency should the housing delivery across the plan area be delayed and fall short of the rolling five-year housing land supply requirements. Additional land should be identified in the plan to ensure avoidance of this potential issue. The LP requires a modification in this regard to make the Local Plan 'sound'
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1424	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1425	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1426	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1427	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1428	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1429	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1430	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.13	File Q	Deborah Jones	SDLP 1431	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.7	File T	Designing out Crime Team (Ally Hendry)	SDLP 14	N/A	Other	Objection to build on current greenbelt land adjacent to the top of Carisbrooke Road, referred to as 'plot' SNF1. Aware of the need for extra housing across Medway but I would have thought building on brownfield or ex-MOD land would have been more of a priority rather than using existing productive 'Greenbelt' arable farming land, that has been in the same farming family for over the last 50 years.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design		No	
Email	E.113	File V	Dickens' Country Protection Society	SDLP 481	N/A	Voluntary and Community Organisations	Object to 'Land West of Strood' allocation – sites SNF1,SNF3, SR5. In greenbelt and grade 1 & 2 agricultural land. Amendment – remove these three sites from proposals map	3. Spatial Development Strategy	3.2 Policies Map	Policies map - South West	Amendment – remove these three sites SNF1,SNF3, SR5 from proposals map. High Halstow HHH26, HHH29 modification.		
Email	E.113	File V	Dickens' Country Protection Society	SDLP 482	N/A	Voluntary and Community Organisations	Raises concern over sites 'Chattenden/Hoo St Werburgh HHH6, HHH8, Hoo St Werburgh HHH12. Requests agricultural land surveys for sites HHH2, HHH31 and HHH33	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.84	File B	Diocese of Rochester	SDLP 296	Savills (Andy Watson)	Developers or Agents	Objects to some of the Green Belt Review assessment of the sites	1. Overview	1.3 How the plan has been prepared	Evidence Base: Green Belt Assessment		No	
Email	E.84	File B	Diocese of Rochester	SDLP 297	Savills (Andy Watson)	Developers or Agents	Object to SA assessment of Sites CHR2 and CHR5 as assessed as non-residential and disagree with elements of the SA assessment rating. Object to some of the position of the Medway Landscape Character Assessment regarding the sites and contend development impact can be mitigated	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		No	
Email	E.84	File B	Diocese of Rochester	SDLP 298	Savills (Andy Watson)	Developers or Agents	Housing supply and location of growth - not taking account of Gravesham BC's unmet need, relying heavily on large scale allocations, and allocations for housing in current employment areas possible this will not be delivered.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.84	File B	Diocese of Rochester	SDLP 299	Savills (Andy Watson)	Developers or Agents	Object to Green Belt policy S7, as it fails to recognise that limited Green Belt release will likely be required, particularly on the edges of existing settlements, suggests policy wording.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt	Policy S7 - After: "There will not be inappropriate development in the Green Belt". Insert: Infilling within or adjacent to existing settlements, as designated on the Policies Map, may also be appropriate where it can be demonstrated that the site should be considered to be within the village and would not undermine the functions of the Green Belt in line with Green Belt Principles	No	
Email	E.84	File B	Diocese of Rochester	SDLP 300	Savills (Andy Watson)	Developers or Agents	Object to Policy T11 which places pressure on SME Housebuilders, suggests The addition "to comply with" ensures the policy is in accordance with Policy T1. Suggests policy wording amendment	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders	Third bullet point: "All dwellings must meet or exceed the comply with national and local design guidance to ensure a high quality of living for residents." Delete fourth, fifth and seventh bullet points	No	
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1659	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1660	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1661	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1662	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1663	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1664	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1665	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1666	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.37	File Q	Donald Baulk	SDLP 1667	N/A	Members of the Public	The draft Local Plan neglects infrastructure, emergency services, and utility needs on the Hoo Peninsula. It misrepresents community assets, ignores traffic and pollution concerns, and proposes relocating businesses, worsening strain	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email & OPUS	E.144	File L	E Butcher	SDLP 794	N/A	Members of the Public	Development proposed along the current boundary (Gravesham) would be more associated with Medway regarding provision of roads, schools, medical facilities which are currently overloaded.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			

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Email & OPUS	E.144	File L	E Butcher	SDLP 795	N/A	Members of the Public	Objection to development on Chapter Farm as green belt should be retained..	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email & OPUS	E.144	File L	E Butcher	SDLP 796	N/A	Members of the Public	Concern over increase in traffic pollution, impact on wildlife and habitats. Vague definition of grey belt land	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email & OPUS	E.144	File L	E Butcher	SDLP 797	N/A	Members of the Public	Proposals Land west of Strood would result in closing the already small gap along Strood-Higham-Chalk-Gravesend, increasing pollution and demand on water/waste services. Planning application MC/25/0006 as an example of expansion of Strood which would impact farmland. Concern that LP was constructed hastily without proper consideration of classification of land.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Hard copy	H.4	File N	Edward J Atkinson	SDLP 1372	N/A	Members of the Public	The plan is unsound, promoting high-risk, unsustainable development on the Hoo Peninsula without confirmed infrastructure funding. It threatens environmental destruction, relies on invalid evidence, and neglects urban housing opportunities. Key allocations like High Halstow are isolated, costly, and undeliverable, placing strain on services and undermining NPPF compliance.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.169	File M	Elaine Cutting	SDLP 1064	N/A	Members of the Public	Development before infrastructure is unsound. Housing development shouldn't come forward until infrastructure is in place and all development should align with village needs. Plan fails to take account of the adopted policies in the Hoo St Werburgh Neighbourhood plan. Section 106 money will not cover costs for new infrastructure.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.51	File T	Endeavour Gillingham Limited	SDLP 208	TDH Estates (Eric Hall)	Other	the requirement for an impact test is contrary to NPPF. We object to this requirement; it is contrary to NPPF and is not justified by the reasons given in the plan or evidence base. We have previously supported the town centre hierarchy policy which includes sub para 1 (b) which states that "The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation the Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester, and Hempstead Valley." This approach is more common in requiring new development to respect the town centre hierarchy without the need for an impact assessment for in centre development which would then be in accord with the NPPF. Accordingly an amendment to delete Hempstead Valley from policy T17 and S23 is sought.	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment	Mod: Accordingly an amendment to delete Hempstead Valley from policy T17 and S23 is sought.		Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.
Email	E.51	File T	Endeavour Gillingham Limited	SDLP 209	TDH Estates (Eric Hall)	Other	the requirement for an impact test is contrary to NPPF. We object to this requirement; it is contrary to NPPF and is not justified by the reasons given in the plan or evidence base. We have previously supported the town centre hierarchy policy which includes sub para 1 (b) which states that "The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation the Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester, and Hempstead Valley." This approach is more common in requiring new development to respect the town centre hierarchy without the need for an impact assessment for in centre development which would then be in accord with the NPPF. Accordingly an amendment to delete Hempstead Valley from policy T17 and S23 is sought.	8. Retail and Town Centres	8.13 Hempstead Valley district centre	Policy S23: Hempstead Valley district centre	Mod: Accordingly an amendment to delete Hempstead Valley from policy T17 and S23 is sought.		Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.
Email	E.51	File T	Endeavour Gillingham Limited	SDLP 210	TDH Estates (Eric Hall)	Other	The inclusion of areas where youths and children congregate may exclude locations where hot food takeaways are most appropriate based on other policies of the Plan and is therefore unduly restrictive.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Mod: Delete ref to: 'places where children and young people congregate'		Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.
Email	E.51	File T	Endeavour Gillingham Limited	SDLP 211	TDH Estates (Eric Hall)	Other	The absence of a zero rate band in the policy is contrary to the evidence base. We object to the omission of a zero rate of affordable housing for sheltered and extra care housing in policy T3.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Mod: Inclusion of a zero rate band.		Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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Email	E.51	File T	Endeavour Gillingham Limited	SDLP 212	TDH Estates (Eric Hall)	Other	the inclusion of "only" in para 2 is misleading and inappropriate. In addition reference to the established character and density of an area. We object to the reference in Policy T2 paragraphs 2 and 3. Paragraph 2 suggests that residential development will only be permitted if it includes a mix of residential types. There may well be sites and opportunities that are suitable for certain types of residential use, and which as part of a wider neighbourhood, would be sustainable in the sense of providing a mix of dwelling types. However the use of the word "only" in the policy suggests that every residential development on its own must provide such a mix. The deletion of "only" is sought. Paragraph 3 of the policy includes that developments must be "appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood". It is considered that the reference to established character and density of the neighbourhood is unduly restrictive and in some instances inappropriate. In the case of Hempstead Valley it is in part bounded by low density suburban housing but as a town centre it would be inappropriate to restrict development to a similar character and density. The second half of the statement should be ~~deleted from "as well as"~~	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Mod: Deletion of "only" Deletion of the words in paragraph 3 of the policy from "as well as" onwards		Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.
Email	E.51	File T	Endeavour Gillingham Limited	SDLP 213	TDH Estates (Eric Hall)	Other	Absence of a town centre boundary is inconsistent and makes it difficult to apply other policies of the Plan. Primary shopping area is also not identified.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South East	Mod: inclusion of a town centre boundary for HVSC and inclusion within appendix.	Yes	Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.
Email	E.68	File U	Environment Agency	SDLP 230	N/A	Statutory Bodies	Policy DM1 - Adaption to Climate Change: This section doesn't reference the need for flood defence improvements and/or adaption to climate change, essential infrastructure will also be affected by climate change. Suggested wording given.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Suggest that the following sentence "Development should not encroach within a minimum of 16m to tidal main rivers" within Policy DM1 should be moved further up in the policy to go alongside the 'ensuring there is appropriate space safeguarded' section. Also suggest that the sentence "Appraising and mitigating the risks of climate change on flooding in site specific flood risk assessments" in policy DM1 should be a separate bullet point under the heading ~~"Adapting to Climate Change"~~	No	
Email	E.68	File U	Environment Agency	SDLP 231	N/A	Statutory Bodies	Policy DM1 - Water supply: The following policy wording should be amended for clarification purposes. Suggested wording given, this change complements text in paragraphs 4.8.9 and 4.8.10 regarding the protection of groundwater supplies and resources for water supply.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Amend Policy DM1 - Water supply: Suggested wording: Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality or quantity of the groundwater resource, and it does not put at risk the ability to maintain a public water supply. Proposals must have regard to the Water Resources Management Plans published by South East Water and Southern Water.	No	
Email	E.68	File U	Environment Agency	SDLP 232	N/A	Statutory Bodies	Policy DM1 - Wastewater / Foul Water drainage: Whilst constructed wetlands can provide additional environmental and water quality benefits, they may not always be suitable. Including the blanket requirement for a wetland in this step of the hierarchy could create confusion and result in an increase in the use of septic tanks, which may not provide the same level of treatment. Suggested amended wording given.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Amend Policy DM1 - Wastewater / Foul Water drainage section - Suggested wording: - If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). Permitting requirements should be understood and if one is required, applications should be made early/in tandem with planning applications. The hierarchy of non-mains alternative solutions must be followed: - o package sewage treatment plants (which should be offered to the sewerage undertaker for adoption in the first instance), where effluent goes through a wetland prior to discharge into the watercourse/ground where it is proven to be appropriate to do so. - o septic tanks; then o in the last instance, a cesspool if no	No	

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Email	E.68	File U	Environment Agency	SDLP 233	N/A	Statutory Bodies	Suggested amended wording given for Policy DM1 - Water quality and groundwater protection	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Amend Policy DM1 - Water quality and groundwater protection - Suggested wording: • 'All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality and resources of water bodies in and adjacent to the district. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures, where necessary. Developers must, o demonstrate an understanding of the Reasons for Not Achieving Good WFD status for all WFD water bodies within and crossing the boundary, in line with the Water Environment (WFD) (England and Wales) Regulations 2017; and o undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures that will protect and enhance water bodies and obtain any permits or	No	
Email	E.68	File U	Environment Agency	SDLP 234	N/A	Statutory Bodies	Suggested amended wording given for Policy DM1 - Sustainable Urban Drainage	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Policy DM1 - Sustainable Urban Drainage - Suggested wording: • 'For infiltration SuDS within source protection zones, as part of their planning application, developers should provide evidence of having consulted the statutory water company responsible for the SPZ and the Environment Agency, to confirm the proposed SuDS design is appropriate to this sensitive hydrogeological location.'	No	
Email	E.68	File U	Environment Agency	SDLP 235	N/A	Statutory Bodies	Contaminated land has a legal definition. It would be more accurate to replace this phrase with 'land that is contaminated' or 'land affected by contamination'.	4. Natural Environment	4.9 Contaminated land		suggested wording in supporting text: 'land that is contaminated' or 'land affected by contamination'.	No	
Email	E.68	File U	Environment Agency	SDLP 236	N/A	Statutory Bodies	Suggested rewording paragraph 4.9.3 for clarification purposes:	4. Natural Environment	4.9 Contaminated land	Paragraph 4.9.3	Paragraph 4.9.3 Suggested wording: 'Works on contaminated sites have the potential to contaminate groundwater, including aquifers and Source Protection Zones (SPZ's). Therefore, investigations, assessments, remediation and monitoring must also consider contamination of groundwater.'	No	
Email	E.68	File U	Environment Agency	SDLP 237	N/A	Statutory Bodies	This policy DM2 wording should be amended for clarification purposes. Suggested wording given.	4. Natural Environment	4.9 Contaminated land	Policy DM2: Contaminated Land	Policy DM2 Suggest wording: 'All land affected by contamination will be remediated prior to development and/or during construction to an appropriate level to its proposed use. Investigations and assessments of all sites situated on, or in close proximity, to land affected by contamination will be required in conjunction with relevant development proposals and a preliminary risk assessment (PRA) should be submitted at the earliest opportunity. This will identify potential risks to human health and the environment and where relevant, inform remedial measures and future monitoring to mitigate and monitor the risk. All investigations should be carried out in accordance with legislation, such as part 2A of the Environmental Protection Act, Building Regulations, and complying with established procedural guidelines. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development will rest with the developer	No	
Email	E.68	File U	Environment Agency	SDLP 238	N/A	Statutory Bodies	Policy T1 should include a bullet point to acknowledge flood risk and how riverside development in heritage areas should adapt to increased flood risk over time. These areas will need to incorporate raised flood defences without adversely affecting the landscape and heritage features of the existing areas. For instance, some areas will need flood defences raising on top of existing defences; others will need replacement of existing defences (with opportunities to redesign them), or the consideration of a setback from existing flood risk.	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenity	add a bullet point to acknowledge flood risk and how riverside development in heritage areas should adapt to increased flood risk over time	No	
Email	E.68	File U	Environment Agency	SDLP 239	N/A	Statutory Bodies	Suggested change to wording to paragraph 5.4.3 for clarification purposes. Suggested wording given.	5. Built Environment	5.4 Sustainable design and construction	Paragraph 5.4.3	'New homes currently must meet a national Building Regulations standard for water efficiency of 125 litres/person/day with planning authorities having the option to reduce this to 110 litres. Southern Water's Target 100 programme aims to reduce usage to 100 litres by 2040. New residential development in Medway must meet or improve on current building regulations.'	No	
Email	E.68	File U	Environment Agency	SDLP 240	N/A	Statutory Bodies	This policy should include a bullet point to acknowledge flood risk and how riverside development in heritage areas should adapt to increased flood risk over time.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Add a bullet point to acknowledge flood risk and how riverside development in heritage areas should adapt to increased flood risk over time.	No	
Email	E.68	File U	Environment Agency	SDLP 241	N/A	Statutory Bodies	Policy T2 Para 3 - There is no mention of SuDs or wastewater management requirements for these developments. Developments will need to ensure that their wastewater requirements do not exceed the capacity of local treatment works e.g. a block of flats may take up the same ground space as a bungalow but will have a significantly bigger impact on the local Sewerage treatment works. This policy should refer to the 'hierarchy of non-mains alternative solutions' in policy DM1.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Suggests referring to the 'hierarchy of non-mains alternative solutions' in policy DM1.	No	

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Email	E.68	File U	Environment Agency	SDLP 242	N/A	Statutory Bodies	Student housing will likely be multistorey buildings, likely to impact on the wastewater treatment works. There is no mention of SuDs or wastewater management requirements for these developments. Developments will need to ensure that their wastewater requirements do not exceed the capacity of local treatment works e.g. a block of flats may take up the same ground space as a bungalow but will have a significantly bigger impact on the local Sewerage treatment works. This policy should refer to the 'hierarchy of non-mains alternative solutions' in policy DM1.	6. Housing	6.5 Student accommodation	Policy T5: Student Accommodation	Suggests referring to the 'hierarchy of non-mains alternative solutions' in policy DM1.	No	
Email	E.68	File U	Environment Agency	SDLP 243	N/A	Statutory Bodies	No consideration of wastewater and how foul sewerage will be disposed of. This policy should refer to the 'hierarchy of non-mains alternative solutions' in policy DM1	6. Housing	6.6 Mobile home parks	Policy T6: Mobile Home Parks	Suggests referring to the 'hierarchy of non-mains alternative solutions' in policy DM1.	No	
Email	E.68	File U	Environment Agency	SDLP 244	N/A	Statutory Bodies	2nd and 4th bullet points - highlight that disposal of grey water is not mentioned in this paragraph. Grey water disposal is not currently regulated and could potentially ~~cause damage to the water environment~~ .	6. Housing	6.7 Houseboats	Policy T7: Houseboats	suggests referring to grey water disposal	No	
Email	E.68	File U	Environment Agency	SDLP 245	N/A	Statutory Bodies	There is a risk that self-building could lead to an increase in environmental incidents such as silt pollution due to lack of understanding and knowledge. There is no mention of SuDs or wastewater management requirements for these developments. Developments will need to ensure that their wastewater requirements do not exceed the capacity of local treatment works e.g. a block of flats may take up the same ground space as a bungalow but will have a significantly bigger impact on the local Sewerage treatment works. This policy should refer to the 'hierarchy of non-mains alternative solutions' in policy DM1.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	Suggests referring to the 'hierarchy of non-mains alternative solutions' in policy DM1.	No	
Email	E.68	File U	Environment Agency	SDLP 246	N/A	Statutory Bodies	Previously recommend, as part of our response to the Regulation 18 consultation, that the impacts of climate change are taken into consideration before permission is granted for sites that are currently in flood risk zone 1. The Strategic Flood Risk Assessment (SFRA) should indicate areas that will move to higher flood risk classifications due to climate change. These outputs should be used to avoid designating sites that will be at a higher risk of flooding in the future.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Flood Risk Assessment	Amend The Strategic Flood Risk Assessment (SFRA) - which should indicate areas that will move to higher flood risk classifications due to climate change.	No	
Email	E.68	File U	Environment Agency	SDLP 247	N/A	Statutory Bodies	Recommend the 'New sites' section of Policy T10 is amended to mention of the requirements for foul drainage. Under the 'Safeguarding existing sites' section, foul drainage to a public sewer is mentioned as a preference, and this should also be the case for new sites. Policy T10 need to be clear that foul drainage to a public sewer should be provided as a first preference, with suitable alternatives facilities considered based on the evidence provided.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople	Amend Policy T10, paragraph 10, Section: New site - to mention of the requirements for foul drainage - that foul drainage to a public sewer is a first preference, with suitable alternatives facilities considered based on the evidence provided.	No	
Email	E.68	File U	Environment Agency	SDLP 248	N/A	Statutory Bodies	We find Policy T15: Sequential Assessment unsound. At present the Strategic Flood Risk Assessment is currently in draft and needs to be updated to include the latest North Kent Coast (Domain 2, 2024). This should be used to support the sequential assessment of sites and inform ~~where sites are to be appropriately allocated~~ .	8. Retail and Town Centres	8.4 Sequential assessment	Policy T15: Sequential assessment		No	
Email	E.68	File U	Environment Agency	SDLP 249	N/A	Statutory Bodies	Suggest that the section on page 156, that states that development will be 'supported by the appropriate level of enabling infrastructure', is supported by a bullet point with ~~suggested wording given~~ .	8. Retail and Town Centres	8.7 Chatham town centre	Policy S17: Chatham town centre	Add a bullet point with suggested wording: Proposals within areas at flood risk should be guided by the development of strategic flood management infrastructure.	No	
Email	E.68	File U	Environment Agency	SDLP 250	N/A	Statutory Bodies	Whilst we recognise that 'Proposals for growth of the centre will be guided by the following: The development of strategic flood management infrastructure', updated modelling of the North Kent Coast (Domain 2, 2024) has highlighted the need for strategic flood management infrastructure within the flood cell of Strood. The current policy does not give a mechanism for strategic flood risk infrastructure to be in place before development takes place. A policy within the MLP must identify how strategic flood management is going to be implemented before any ~~development is undertaken~~ .	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre		No	
Email	E.68	File U	Environment Agency	SDLP 251	N/A	Statutory Bodies	This section could identify the opportunity to maximise wider benefits for development sites in planning and implementing flood risk management schemes adjacent to the river/coast. These can included improvements for recreation, amenity, water quality and biodiversity (contributing to achieving River Bain Management Plan (RBMP) objective); as well as addressing the impacts of climate change, including new or improved green blue infrastructure. There is an opportunity to incorporate this information into Policy T27: Reducing Health Inequalities ~~to ensure that flood risk management is integrated into the planning process~~ .	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Paragraph 10.2	Incorporate paragraph 10.2 into Policy T27	No	

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Email	E.68	File U	Environment Agency	SDLP 252	N/A	Statutory Bodies	The statement at paragraph 12.1.33 is unclear and gives the impression that foul sewerage diluted by rainwater does not need to be treated. This needs to be reworded clarify that the wastewater will still need to be treated and that rainwater in sewerage should be avoided. Suggested wording given.	12. Waste Management	12.1 Introduction	Paragraph 12.1.33	Suggested wording to be added to paragraph 12.1.33: 'Effluent is increasingly diluted with volumes of rainwater due to the combined effects of urban expansion and climate change. This increases the volume of water being pumped and treated by WTW and reduces the overall capacity. Steps should be taken to reduce the amount of rainwater going into foul sewer.'	No	
Email	E.68	File U	Environment Agency	SDLP 253	N/A	Statutory Bodies	Statement at paragraph 12.1.34 does not match with current understanding of wastewater treatment works in Medway.	12. Waste Management	12.1 Introduction	Paragraph 12.1.34		No	
Email	E.68	File U	Environment Agency	SDLP 254	N/A	Statutory Bodies	As mentioned in the comments for paragraph 4.8.11 in chapter 4 on page 50, there is evidence that some of the wastewater treatment works, particularly those at Stoke and Motley are close to or exceeding capacity. Medway Council will need to check with the water companies to confirm facilities are able to cope with increasing demand.	12. Waste Management	12.5 Provision of new waste management facilities	Paragraph 12.5.30		No	
Email	E.68	File U	Environment Agency	SDLP 255	N/A	Statutory Bodies	to the risk of flooding', whilst this may be appropriate for development of certain brownfield sites, we suggest wording is added. While we acknowledge a line for flood defence infrastructure has been placed in the infrastructure delivery plan, it is not clear that improved and raised flood defence infrastructure would be a pre-condition to enable these development sites to be viable.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds	Add suggested wording: "Proposals within areas at flood risk should be guided by the development of strategic flood management infrastructure to protect both the allocated development sites and the existing Chatham town centre community at tidal flood risk".	No	
Email	E.68	File U	Environment Agency	SDLP 256	N/A	Statutory Bodies	Point 10 refers to site GN15, which we find unsound. There are significant parts of the proposed site allocation that lie within Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to NPPF. The site will only be deemed as being sound if the area in flood zone 3b is limited to water compatible development. The Strategic Flood Risk Assessment Level 2 document (draft) makes the wrong assumption that recent flood defence works have taken these sites out of Flood Zone 3b. Point 10 of the policy states that 'the scale of housing on GN15 will require land reclamation', for this reason we also find the policy to be unsound as encroachment into the estuary is against the Environment Agency's National Encroachment Policy. In addition, there isn't a line in the MLP Infrastructure Delivery Plan for River Waterfront for flood defence infrastructure. Improved and raised flood defence infrastructure and/or land raising would be a pre-condition for these allocated sites which are currently high flood risk.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		No	
Email	E.68	File U	Environment Agency	SDLP 257	N/A	Statutory Bodies	Policy SA5: Strood Town Centre and Surrounds identifies a number of sites which we find to be unsound due to them being located in Flood Zone 3b. The Strategic Flood Risk Assessment Level 2 document (draft) makes the wrong assumption that recent flood defence works have taken these sites out of Flood Zone 3b. In addition, point 12 within the policy states that 'flood risk is appropriately mitigated and managed to support development'. However, it does not state how flood risk will be appropriately mitigated and managed to support development. This should be detailed within the policy, alongside the mechanism for delivery before development on sites is able to take place. While there is a line in the MLP Infrastructure Delivery Plan for Strood flood defence infrastructure, it should be made clear that improved and raised flood defence infrastructure would be a pre-condition for these allocated sites to be acceptable, as they are currently in areas of high flood risk.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds	State how flood risk will be appropriately mitigated and managed to support development within Policy SA5 alongside the mechanism for delivery before development on sites is able to take place	No	
Email	E.68	File U	Environment Agency	SDLP 258	N/A	Statutory Bodies	Site HHH12 is allocated for residential (and community facility uses), at present we find the proposed site allocation unsound, because the area will be impacted by coastal change. However, the proposal could be deemed as sound if a coastal vulnerability assessment identifies land that is resilient to coastal change and development is restricted to this area. Within the Southeast and Northwest Policy Maps the area is shown to be entirely residential. However, point 16 within Policy SA8, states that 'Growth will be directed within a strategic environmental framework that will define the outward development of Hoo and Chattenden. This will provide an effective buffer to sensitive habitats and connect people to the countryside and coast.'. There needs to be a consistency within the Regulation 19 and the supporting documents. It should also be noted that Hoo Wetlands Reserve is in an area of potential coastal change, where setback flood defences and areas of No Active Intervention are planned over the next 15 years as part of the Medway Estuary and Swale Strategy (2019). The Environment Agency needs to be a strategic partner in the planning and development of the Wetlands reserve to ensure the objectives of the site are not undermined in the future by coastal change.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	if a coastal vulnerability assessment identifies land that is resilient to coastal change and development is restricted to this area	No	

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Email	E.68	File U	Environment Agency	SDLP 259	N/A	Statutory Bodies	Policy SA11: Rural Settlements detailed to be unsound. This is due to the site CHR14 being allocated as part of the policy. A large section of the site lies within Flood Zone 3b, and therefore more vulnerable development on this section of the site would be contrary to NPPF. The Strategic Flood Risk Assessment Level 2 document (draft) makes the wrong assumption that recent flood defence works have taken these sites out of Flood Zone 3b. The site will only be sound if the area within 3b is restricted to water compatible development. This change must also be reflected in Policy SA11: Rural Settlements, before it can be found to be	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	Suggests Policy SA11 is amended to reflect the area within Flood Zone 3b is restricted to water compatible development. Possibly remove site CHR14	No	
Email	E.68	File U	Environment Agency	SDLP 260	N/A	Statutory Bodies	Policy SA12: Other sites we find unsound. This is due to the site RWB2 being allocated as part of the policy. A large section of the site lies within flood zone 3b. The Strategic Flood Risk Assessment Level 2 document (draft) makes the wrong assumption that recent flood defence works have taken these sites out of Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to the NPPF. The site will only be sound if the area within Flood Zone 3b is restricted to water compatible development. This change must also be reflected in Policy SA12: Other sites, before it can be found to be sound.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites	Suggests Policy SA12 is amended to reflect the area within Flood Zone 3b is restricted to water compatible development. Possibly remove site RWB2	No	
Email	E.68	File U	Environment Agency	SDLP 261	N/A	Statutory Bodies	It is very likely that 'hard' flood defence infrastructure will always be needed to protect Chatham and Strood town centres from the risk of flooding. However, there is an identified opportunity to look at setback defences and/or land raising to allow space for water which could support wider regeneration aspirations outlined in the MLP, which includes flood defence raising elsewhere i.e. flood storage compensation. It is important to consider the level of protection that these town centres will need for the lifetime of the proposed developments, including the impact of climate change. The Frindsbury Peninsula Planning Framework needs to include a detailed a strategic flood risk management plan or study is required in advance of developing the Frindsbury Peninsula Opportunity area.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.7		No	
Email	E.68	File U	Environment Agency	SDLP 262	N/A	Statutory Bodies	Strategic flood defence infrastructure, including the refurbishment of the existing flood defences which are reaching the end of residual life would be a requirement to support the employment allocations at Kingsnorth. This has been identified in the MLP Infrastructure Delivery Plan and could a pre-condition for these allocated sites which have a high residual flood risk. Delivery of flood risk management works could be led by the developer, or may be dependent on contributions from third parties to the relevant risk management authority. There is currently a lack of clarity in the MLP about how such flood defence dependencies will affect the deliverability of the site allocations in areas of	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15		No	
Email	E.68	File U	Environment Agency	SDLP 263	N/A	Statutory Bodies	Before a detailed proposal is to come forward for St Mary's Island employment site SM16, a site-specific Flood Risk Assessment should be submitted with the latest flood risk modelling of the North Kent Coast	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront (Site SM16)	A site-specific Flood Risk Assessment should be submitted with the latest flood risk modelling of the North Kent Coast for site SM16.	No	
Email	E.68	File U	Environment Agency	SDLP 264	N/A	Statutory Bodies	We are aware that planning permission exists to undertake land raising and flood defence works, to minimise flood risk to the site SNF35. However, flood risk remains surrounding this site allocation which would impact access and egress without further improvements to existing flood defences. As such we have no objection in principle.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds (SNF35)		No	
Email	E.68	File U	Environment Agency	SDLP 265	N/A	Statutory Bodies	In SFRA: For site allocations that have passed the Sequential test, the sequential approach should be applied to locating and designing development on a site-based scale. In Table 9.2, 4 allocated sites are identified to lie within 20m of the toe of a proposed/existing flood defence. In particular, the following allocations should consider their proximity to flood defences or the bank of the river, these are: SNF41, RWB25, SR53, CCB25, FP11, GN15, GN16, HHH12, CHR14, RWB2, SR48 and SM16. This is likely to affect the viability of the sites to deliver the housing numbers, if a sufficient buffer zone has not previously been	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Flood Risk Assessment	Sufficient buffer zone - 20m of the toe of a proposed/existing flood defence is needed.	No	

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Email	E.68	File U	Environment Agency	SDLP 266	N/A	Statutory Bodies	We find the site allocation RWB25 to be unsound, as a section of the site lies within flood zone 3b. More vulnerable development is not compatible with Flood Zone 3b, and therefore contrary to NPPF. A section of the site lies within Flood Zone 3b and so this area should be restricted for water compatible development. For the remainder of the site more vulnerable development will only be acceptable, if appropriate flood defence works take place. Any proposed development must also demonstrate that the proposed development is set back from the tidal Medway and provides an adequate access margin to the flood defence, to undertake future maintenance. A FRAP will be required for any works within 16m from the landward toe of the defence. This, together with the extent of Flood Zone 3b may place significant constraints on development at this	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites (Site RWB25)		No	
Email	E.68	File U	Environment Agency	SDLP 267	N/A	Statutory Bodies	We would only find the site allocation SNF34 sound if our flood risk comments are taken into consideration. Strategic flood defences in this area will be required, if these works are not undertaken for this site developer contributions would be required. Before any works to develop the site take place, suitable flood defences must be in place to keep the development safe for its lifetime. Safe access and egress should also be considered by the local planning authority before this site is considered for	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds (Site SNF34)		No	
Email	E.68	File U	Environment Agency	SDLP 268	N/A	Statutory Bodies	We would only find the site allocation SNF38 sound if our flood risk comments are taken into consideration. The entirety of the current site sits within flood zone 3b. We recognise that this is a previously developed site and so the LPA should have regard to Table 2: flood risk vulnerability and flood zone incompatibility of the flood risk planning policy guidance. It would only be suitable for more vulnerable development once a strategy for appropriate flood protection has been confirmed and the scheme	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds (Site SNF38)	Take flood risk comments into consideration.	No	
Email	E.68	File U	Environment Agency	SDLP 269	N/A	Statutory Bodies	We find the site allocation SNF41 unsound, because a small section of the site lies within the functional flood plain. We would only deem the site sound if the area within flood zone 3b is kept as water compatible development. A small section of the site lies within flood zone 3b. We would object in principle to any more vulnerable development proposals within the functional floodplain. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest risk. Strategic flood defences in this area will be required, if these works are not undertaken for this site developer contributions would be required.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds (Site SNF41)	only deem the site sound if the area within flood zone 3b is kept as water compatible development.	No	
Email	E.68	File U	Environment Agency	SDLP 270	N/A	Statutory Bodies	We find the site allocation SNF15 to be unsound, because a considerable section of the site lies within flood zone 3b. A considerable section of the site lies within flood zone 3b. We would object in principle to any more vulnerable development proposals within the flood zone 3b, as it is contrary to guidance in the NPPF. Strategic flood defences in this area will be required, developer contributions would be required.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds (Site SNF15)	Strategic flood defences in this area will be required, developer contributions would be required.	No	
Email	E.68	File U	Environment Agency	SDLP 271	N/A	Statutory Bodies	We would only find the proposed site allocation FP11 sound if our flood risk comments are taken into consideration. A small section of the site lies within flood zone 3b. We would object to any more vulnerable development proposals within Flood Zone 3b. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest flood risk. If this site is to be allocated flood defences would be required to enable this development, and should demonstrate in a detailed flood risk assessment that there is no increase to flood risk elsewhere.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites (Site FP11)		No	
Email	E.68	File U	Environment Agency	SDLP 272	N/A	Statutory Bodies	We would only find the proposed site allocation CCB25 sound if our flood risk comments are taken into consideration. A small section of the site lies within Flood Zone 3b. We would object in principle to any more vulnerable development proposals within the functional floodplain. All development within flood zone 3b should be limited to water compatible development. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest risk.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites (Site CCB25)		No	

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Email	E.68	File U	Environment Agency	SDLP 273	N/A	Statutory Bodies	We would only find the site allocation SM16 to be sound if the flood risk comments that we have made are taken into consideration in any proposals going forward. We would object to any more vulnerable development proposals within the Flood Zone 3b and measures should be in place to ensure that the loch gates remain functional including access. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest risk. Before any works to develop the site take place, suitable flood defences must be in place to mitigate the risk of flooding to St Mary's Island including consideration of how flood risk assets around the site allocation (including the existing lock gates) will be raised, replaced or managed in	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront (Site SM16)		No	
Email	E.68	File U	Environment Agency	SDLP 274	N/A	Statutory Bodies	We find the site allocation GN15 to be unsound, as the site mainly lies within Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to NPPF. The site will only be deemed as being sound if the area in flood zone 3b is limited to water compatible development. This site lies mainly within flood zone 3b and so areas within Flood Zone 3b should be restricted for water compatible development. We would object in principle to any more vulnerable development proposals within the functional floodplain. We recognise that this is a previously developed site and so the LPA should have regard to Table 2: flood risk vulnerability and flood zone incompatibility of the flood risk planning policy guidance. Any more vulnerable development proposals should be outside of flood zone 3b.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront (Site GN15)		No	
Email	E.68	File U	Environment Agency	SDLP 275	N/A	Statutory Bodies	We find the site allocation GN6 to be unsound, as a small section of the site lies within Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to NPPF. The site will only be sound if the area within flood zone 3b is restricted to water compatible development. We would object in principle to any more vulnerable development proposals within the functional floodplain. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest risk. If this site is to be allocated the LPA should be satisfied that there is safe	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront (Site GN6)		No	
Email	E.68	File U	Environment Agency	SDLP 276	N/A	Statutory Bodies	We find the proposed site allocation HHH12 unsound, because of the area that will be impacted by coastal change. The proposal could be deemed sound if a coastal vulnerability assessment identifies land that be resilient to coastal change and development is restricted to this area. The Medway Estuary and Swale Strategy states that this is a No Active Intervention frontage. This site has the potential to be a coastal change management area. The southern portion of the site will be vulnerable to coastal erosion. Any allocation should be supported by a coastal vulnerability assessment.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Any allocation should be supported by a coastal vulnerability assessment.	No	
Email	E.68	File U	Environment Agency	SDLP 277	N/A	Statutory Bodies	We find the site allocation CHR14 to be unsound, as a large section of the site lies within Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to NPPF. The site will only be sound if the area within flood zone 3b is restricted to water compatible development. Whilst part of the site of the site is flood zone 1, a significant part is flood zone 3b. We would oppose any development other than water compatible development within flood zone 3b. We would have no objection to residential development on the parts of the site within flood zone 1. Any development should include means of safe access and this may require appropriate on site flood mitigation to avoid	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		No	

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Email	E.68	File U	Environment Agency	SDLP 278	N/A	Statutory Bodies	Overall, from a strategic flood risk management perspective, this draft development plan is unsound for the following reasons:- • The Strategic Flood Risk Assessments (June, 2025) does not include or use the latest flood risk information from the North Kent Coast flood Domain 2 model (2024) to inform the Sequential and Exception tests. • The SFRAs, Flood Risk Sequential Test Report and the Sustainability Appraisal do not clearly demonstrate how high and medium flood risk site allocations have been selected and justified by applying the Sequential Test, and where appropriate, the Exception Test. There remain some site allocations located in areas at high risk of flooding (either existing or in the future) which are inappropriate and go against both national planning policy and guidance. • Generic and weak policy wording in places, means that it is not clear how proposed development sites will manage their flood risk if they are reliant on the delivery of flood defence infrastructure (particularly if they are on third party land) and/or how they will appropriately safeguard land that is required to maintain and improve flood risk management infrastructure in the future. Strategic flood defences are likely to be required before the site allocations in the following areas will be permitted. It is unclear how the delivery and funding of strategic flood defence works will enable the safe development of the site allocations within the following flood cell areas: o Strood Town Centre and Surrounds o Chatham Town Centre and Surrounds o River Waterfront o Kingsnorth Expansion Area o Frindsbury Peninsula Opportunity Area In addition, the draft	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management		No	
Email	E.68	File U	Environment Agency	SDLP 278	N/A	Statutory Bodies	We find the site allocation RWB2to be unsound, as a large section of the site lies within Flood Zone 3b. More vulnerable development in flood zone 3b is contrary to NPPF. The site will only be sound if the area within flood zone 3b is restricted to water compatible development. We would oppose any development other than water compatible development within flood zone 3b. Any development on the proposed site should take a sequential approach, steering development to areas of the lowest risk. Any flood risk assessment must demonstrate that there is no displacement of flood water, and that flood risk is not	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites (Site RWB2)		No	
Email	E.68	File U	Environment Agency	SDLP 279	N/A	Statutory Bodies	Inaccuracies and inconsistencies with the SFRA Level 1 and Level 2 which undermine the outcomes of the site allocations overall. Level 1 uses temporary flood defences (Section 4.4.3) and resistance and resilience (Section 4.4.5) to justify site allocations at flood risk, however the Sequential Test should steer development sites to areas of lowest flood risk first	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Flood Risk Assessment		No	
Email	E.68	File U	Environment Agency	SDLP 279	N/A	Statutory Bodies	We find the site allocation HHH36 to be sound, provided our flood risk comments are taken into consideration. The area lies within flood zone 3. It is currently protected by existing flood defences maintained by the Environment Agency. However, flood defence infrastructure is likely to need replacing/improving before any works to develop the site take place due to aging flood defence infrastructure. If flood defences are not improved for the site by the developer	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites (HHH36)		No	
Email	E.68	File U	Environment Agency	SDLP 280	N/A	Statutory Bodies	Level 2 SFRA is unsound as it relies on outdated flood risk evidence from the Level 1 SFRA to support the application of the Sequential and Exception tests for the proposed site allocations. There are a number of 'more vulnerable' residential site allocations that are located in Flood Zone 3a and 3b e.g. site allocation CHR14. This is against NPPF and is not clear from the SFRA how it's passed both the Sequential and Exception tests	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Flood Risk Assessment - Level 2		No	
Email	E.68	File U	Environment Agency	SDLP 280	N/A	Statutory Bodies	We would only find the site allocation SR48 to be sound, if the flood risk comments that we have made are taken into consideration in any proposals going forward. Any development of the site should take the sequential approach, steering development towards the areas at the lowest risk	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites (Site SR48)		No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.68	File U	Environment Agency	SDLP 281	N/A	Statutory Bodies	We have not previously reviewed the Flood Risk Sequential Test Report. We find it unsound for the following reasons:- • The Strategic Flood Risk Assessment (June, 2025) is in Draft and does not include the latest flood risk information from the North Kent Coast flood model (Domain 2, 2024). The SFRA should also consider the New National Modelling and National Coastal Erosion Risk Mapping that the Environment Agency has produced and how it is reflected in the most up to date Flood Zones and Shoreline Management Plans. • Of the 37 sites located in Flood Zone 3 were taken forward to the SFRA L2 assessment (section 7.3, page 13), 23 sites are located within or partially within Flood Zone 3b. It is clear from assessing the individual site allocations and the SFRA2 (draft) that some of these sites taken forward to the Exception text are unsuitable for development and incorrect assumptions about new flood defence infrastructure removing every site out of Flood Zone 3b. It is not clear what alternatives sites at lower flood risk have been disregarded through the application of the Sequential Test in the development of the local plan. The National Flood Risk Vulnerability Classification within the National Planning Practice Guidance says that more vulnerable development in Flood Zone 3b should not be permitted. In addition, we have the following points of clarification: • Section 6 – does not acknowledge the coastal Medway Estuary and Swale strategy (2019) which is a key strategic flood risk plan for the area, which proposes the nature and timing of flood risk interventions for managing tidal flood risk.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Flood Risk Assessment - Sequential Test Report		No	
Email	E.68	File U	Environment Agency	SDLP 281	N/A	Statutory Bodies	We find the site allocation HHH22 & HHH31 to be sound provided the sequential approach is taken in any proposals going forward. We would have no objection to residential development on this site in flood zone 1. Any development on the site should take a sequential approach, steering development to Flood Zone 1.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.68	File U	Environment Agency	SDLP 282	N/A	Statutory Bodies	In SA Section 7 Table N.7.1 the summary of residual effects column states that 'Subject to achieving the recommendations set out in the SFRA, it is likely that the MLP will have a negligible effect on flooding.'. However, it is not clear where the evidence is to support this statement, as there are many site allocations within high flood risk areas.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		No	
Email	E.68	File U	Environment Agency	SDLP 282	N/A	Statutory Bodies	We would only find the site allocation SR49 to be sound, if the flood risk comments that we have made are taken into consideration in any proposals going forward. Any development of the site should take the sequential approach, steering development towards the We have no objection in principle to development on this site. However, the site will become at flood risk during the lifetime of the development and therefore the proposal should be supported by a site-specific flood risk assessment. The SFRA should be used to inform suitable development sites.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites (Site SR49)		No	
Email	E.68	File U	Environment Agency	SDLP 283	N/A	Statutory Bodies	Suggests adding a bullet point to reflect the flood defence needs in planning, mitigating and adapting to climate change, as there are many proposed development sites that will be at significant flood risk in the future. Also at paragraph 4 of Effective spatial planning and placemaking part of this policy (page 29) - Supportive of this protection of existing surface water flow routes and drainage features, providing there is no potential deterioration of the water quality. At Adaption to climate change part of policy, paragraph 6 (Pages 29 and 30) - Would support and find the policy to be sound if it was strengthened by adding in a statement about mitigating against the impact of climate change on surface water quality through effective collaboration with key stakeholders and developers to implement measures that will ensure water bodies are more resilient to the effects of climate change.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Add to Policy S1: • Taking into account climate change and sea level rise, there are some development sites that are at increasing flood risk and will rely on future flood defence infrastructure improvements/replacements in order to be safe for their lifetime of their development. • Riverside development should provide the space enable the flood risk infrastructure and space required to maintain, setback or raise flood defences in response to climate change.	No	
Email	E.68	File U	Environment Agency	SDLP 283	N/A	Statutory Bodies	We find the site allocation HHH32 to be unsound, as the development will not be safe for its lifetime. The site lies within flood zone 3. The preferred option of the Medway Estuary and Swale Strategy is for No Active Intervention in this area from around 2040 onwards. This will increase the risk of failure of the defences which will make the proposal unsafe during its lifetime.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.68	File U	Environment Agency	SDLP 284	N/A	Statutory Bodies	Pleased to see the importance of the Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) highlighted; however, the wording should be amended for accuracy. Suggested wording given.	4. Natural Environment	4.2 Planning for climate change	Paragraph 4.2.7	Suggested adding: It is the statutory duty of local authorities to deliver objectives under the Water Environment (Water Framework Directive) (England and Wales) Regulations (2017).	No	

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Email	E.68	File U	Environment Agency	SDLP 285	N/A	Statutory Bodies	The wording should be strengthened to ensure that SuDS is always prioritised as a first option, and that any alternative options should also prevent the deterioration of water quality in receiving water bodies.	4. Natural Environment	4.2 Planning for climate change	Paragraph 4.2.8	Suggested adding: 'Rainwater management through SuDS is the preferred approach, with alternatives used only where SuDS is proven to be an unsuitable option. Any alternative option chosen should also limit the amount of water entering the sewers and prevent the deterioration of water quality in receiving water bodies.'	No	
Email	E.68	File U	Environment Agency	SDLP 286	N/A	Statutory Bodies	We support the policy (S2). However, it needs to be clarified in paragraph 1 if the 'saltmarsh' in your district is "irreplaceable" habitat. 'Salt marsh' is irreplaceable if it is 'Spartina saltmarsh swards' and 'Mediterranean saltmarsh scrub' but all other types of salt marsh habitat are considered replaceable. Link given to Irreplaceable habitats and BNG: what you need to know – Environment.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Policy S2 paragraph 1 - Suggests clarifying if the saltmarsh is irreplaceable habitat.	No	
Email	E.68	File U	Environment Agency	SDLP 287	N/A	Statutory Bodies	Recommend adding wording to Policy S2 paragraph 3 for clarification.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Policy S2 paragraph 3: "Through the Local Plan, the Council will conserve, restore and enhance Medway's rich and diverse environmental assets, including statutory and non-statutory designated sites, priority habitats and species, and protected species. The Council will seek opportunities, including through development, to support the implementation of the Kent and Medway Local Nature Recovery Strategy to strengthen biodiversity and the wider natural environment."	No	
Email	E.68	File U	Environment Agency	SDLP 288	N/A	Statutory Bodies	In SA Section 9: No reference is made to TE2100. Concern raised over sites within Flood Zones 1, 2, and 3.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal	In Sustainability Appraisal Volume 2 Section 9.1.12 on page 70 - add reference to TE 2100 Plan.	No	
Email	E.68	File U	Environment Agency	SDLP 289	N/A	Statutory Bodies	The IDP hasn't considered the required flood defence works identified within the Level 2 Strategic Flood Risk Assessment (Draft), therefore the IDP is underestimating the cost and deliverability of implementing the site allocations in flood risk areas. The IDP also does not refer to the Thames Estuary 2100 Plan and associated flood defence plans between Cliffe and the Isle of Grain.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan	Add reference to the TE 2100 Plan and associated flood defence plans between Cliffe and the Isle of Grain.	No	
Email	E.68	File U	Environment Agency	SDLP 290	N/A	Statutory Bodies	Recommend that this policy should be linked in with key legislation Water Environment Regulation 2017. Suggested wording given.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Suggested wording Policy S2 paragraph 9: 'Development should safeguard features of the natural environment and nature conservation interest and make nature-based solutions part of the plans to tackle the climate emergency. Where there is an opportunity for river restoration enhancements, re-meandering, or the restoration of culverted watercourses to open channels, this should be actively pursued. If and where the watercourse is toe-boarded or engineered, opportunities for removal and restoration to a more natural state should be considered. These measures should not only prevent deterioration but also actively enhance the natural environment, thereby supporting the achievement of 'good ecological and chemical status' for all water bodies, as mandated by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. There may be requirements for development to contribute to strategic environmental management and/or flood defence schemes to ensure an effective mitigation approach in particularly sensitive locations, such as in close proximity to designated sites and areas of significant flood risk, either now or in the future.'	No	
Email	E.68	File U	Environment Agency	SDLP 291	N/A	Statutory Bodies	Policy S2 - Hoo Peninsula Strategic Environmental Programme - paragraph 14. This paragraph is unclear, amend wording to clarify. Suggested wording given.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Suggested wording Policy S2 paragraph 14: 'Development should support the conservation and enhancement and of Lodge Hill SSSI, and the Medway Estuary and Marshes SPA, Ramsar site and SSSI'	No	
Email	E.68	File U	Environment Agency	SDLP 292	N/A	Statutory Bodies	Policy S2 - Biodiversity (BNG): Given that there is no real justification for not setting the requirement for BNG to be 20%, recommend the target be increased to at least 20%, unless a lesser figure can be justified by a developer.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Increase BNG target to 20%	No	
Email	E.68	File U	Environment Agency	SDLP 293	N/A	Statutory Bodies	Additional context should be added regarding coastal flood risk management. Habitats along the length of the Tidal Thames and the Medway Estuary and Swale are threatened by sea level rise, "coastal squeeze" and erosion due to the presence of shoreline defences which prevents the intertidal habitats migrating on-shore to higher elevations on the natural floodplain. Adaptation of the coast is documented in the Environment Agency's Medway Estuary and Swale Strategy (2019) and the Thames Estuary 2100 Plan (2012 and updated in 2022).	4. Natural Environment	4.4. Sites of international importance for nature conservation			No	
Email	E.68	File U	Environment Agency	SDLP 294	N/A	Statutory Bodies	Would support and find this policy to be sound if it was strengthened by including more focus on the protection and enhancement of blue infrastructure, as currently the main focus is predominantly on green infrastructure.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		No	

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Email	E.68	File U	Environment Agency	SDLP 295	N/A	Statutory Bodies	Supportive of use for Drainage and Wastewater Management Plans (DWMPs) but would like the wording to clarify that the DWMP include short term and medium term goals as well. Suggested wording given.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.12	Add: Drainage and Wastewater Management Plans will provide an opportunity to improve water quality and drainage systems and will address pollution and flooding for the benefit of communities and the environment. DWMPs include short term (1-5 years), medium term (5-15 years) and long term (15-25+ years) goals to ensure the resilience and sustainability of wastewater infrastructure, and take into account projected growth over the Local Plan period.	No	
Email	E.68	File U	Environment Agency	SDLP 296	N/A	Statutory Bodies	This section doesn't currently reflect the wider role of the SFRA and Local Development Plans which Medway council are responsible for, which is covered by the Policy DM1. Suggested adding bullet point, wording given.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.4	Amend paragraph 4.8.4: • Ensure that Local Plans with their associated policies and site allocations ensure:- * no inappropriate development is located in areas at high risk of flooding (whether existing or future). * development in areas at risk of flooding will be safe for its lifetime without increasing flood risk elsewhere. * any residual flood risk can be safely managed and policies contribute to improving flood resilience and management future flood risk in the context of climate change. * development contributes to reducing flood risk for existing communities.	No	
Email	E.68	File U	Environment Agency	SDLP 297	N/A	Statutory Bodies	We are not supportive of this statement based partly on the evidence in the supporting document 'Waste Needs Assessment – Scoping Review of Other Waste Streams'. Evidence available suggests that there will potential capacity issues in the near future. Medway Council will need to check with the water companies in regard to potential developments to confirm facilities are able to cope with increasing demand.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.11		No	
Email	E.68	File U	Environment Agency	SDLP 298	N/A	Statutory Bodies	We suggest the following change to policy wording, as the current text is not specific, measurable, achievable, relevant or timebound:-	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Amend Policy DM1: Ensure there is appropriate space safeguarded for future maintenance and the raising of flood risk management infrastructure, in light of climate change and the relevant local flood risk management plans e.g. Thames Estuary 2100 Plan (reviewed in 2023) and the Medway Estuary and Swale Strategy (2019). Development should not encroach within a minimum of 16m to tidal main rivers, or 8m of other watercourses, unless justified by evidence at planning application stage, and agreed in consultation with the relevant risk management authority.	No	
Email	E.68	File U	Environment Agency	SDLP 299	N/A	Statutory Bodies	Within Policy DM1 it states that flood risk management infrastructure will 'contribute to the Environment Agency's flood risk management programme', this statement should instead read 'contribute towards flood risk infrastructure'. The policy then goes on to state, 'Medway Council will identify an appropriate mechanism such as planning obligations / S106 agreements, or other approaches to support flood risk works under the MEAS and TE2100 programmes.'. However, it is not clear what mechanism will be put into place and how this will be enforced. There either needs to be a commitment to produce a supplementary guidance or a detailed policy which covers this off, or a need to be more specific about the approach required by Medway Council within this policy. It would need to identify and implement appropriate delivery and funding mechanisms such as planning obligations, Section 106 agreements, or other approaches to support flood risk works, including the Medway Estuary	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Within Policy DM1 it states that flood risk management infrastructure will 'contribute to the Environment Agency's flood risk management programme', this statement should instead read 'contribute towards flood risk infrastructure'. The policy then goes on to state, 'Medway Council will identify an appropriate mechanism such as planning obligations / S106 agreements, or other approaches to support flood risk works under the MEAS and TE2100 programmes.'. However, it is not clear what mechanism will be put into place and how this will be enforced. There either needs to be a commitment to produce a supplementary guidance or a detailed policy which covers this off, or a need to be more specific about the approach required by Medway Council within this policy. It would need to identify and implement appropriate delivery and funding mechanisms such as planning obligations, Section 106 agreements, or other approaches to support flood risk works, including the Medway Estuary	No	
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1508	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1509	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1510	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1511	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1512	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1513	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1514	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			

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Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1515	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1516	N/A	Members of the Public	Concern about amazon lorries on existing overloaded road network	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1517	N/A	Members of the Public	Concern about already overloaded public services and further strain	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.23	File Q	Eric Bishop	SDLP 1518	N/A	Members of the Public	Concern over lack of healthcare services with 3-4 week doctor wait and 4.5 hours hospital wait	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 184	N/A	Developers or Agents	Support	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 185	N/A	Developers or Agents	Support.	2. Vision and Strategic Objectives	2.1 Vision				
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 186	N/A	Developers or Agents	Support. Recommend floorspace figures be update from square foot. Pedestrian crossing should be identified as a strategic infrastructure requirement	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 187	N/A	Developers or Agents	Support but remove reference to Hoo Development Framework. It isn't part of the evidence base so expectations are not clear	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	Remove reference to Hoo Development Framework		
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 188	N/A	Developers or Agents	Make reference to Flanders Farm provision of facilities serving the community.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 189	N/A	Developers or Agents	Unclear what the need for policy S12 is given employment is allocated in policies SA14 and S22	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites			
Email	E.47	File B	Esquire Developments (Flanders Farm)	SDLP 190	N/A	Developers or Agents	Proposal at Flanders Farm will support health objectives.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.134	File D	Esquire Developments (Rainham Parkside Village)	SDLP 743	N/A	Developers or Agents	More work needed on IDP to clarify infrastructure expectations including contributions.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			Yes	
Email	E.134	File D	Esquire Developments (Rainham Parkside Village)	SDLP 744	N/A	Developers or Agents	Extend plan period by at least one year.	1. Overview	1.3 How the plan has been prepared		Extend by one year+	Yes	
Email	E.134	File D	Esquire Developments (Rainham Parkside Village)	SDLP 745	N/A	Developers or Agents	Housing need – Further work to clarify if uplift is needed, against infrastructure need/cost. Test via SA.	1. Overview	1.3 How the plan has been prepared			Yes	
Email	E.134	File D	Esquire Developments (Rainham Parkside Village)	SDLP 746	N/A	Developers or Agents	Clarify high low value areas. Map (alongside policy T3) may help – unclear which sites high low value.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Map amendment	Yes	
Email	E.134	File D	Esquire Developments (Rainham Parkside Village)	SDLP 747	N/A	Developers or Agents	Further work to consider level of affordable housing needed across identified sites.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing		Yes	
Online	308	Online (OPUS)	F D Attwood and Partners [308]	4912	Hume Planning Consultancy (Alister Hume)	Developers or Agents	Support the vision, development requirement of the plan and the spatial strategy which includes the Capstone corridor as a strategic location for growth. The majority of the strategic corridor is within single family landownership and can be master planned and help deliver key infrastructure and green infrastructure	Regulation 19 Consultation		Paragraph 5			
Online	308	Online (OPUS)	F D Attwood and Partners [308]	4914	Hume Planning Consultancy (Alister Hume)	Developers or Agents	The strategic allocation and indicative masterplan for the Capstone Corridor is supported. Promotes development of the Capstone corridor and suggests it has a shorter lead in time than alternative locations	Regulation 19 Consultation		Paragraph 17 - Chapter 14			
Online	308	Online (OPUS)	F D Attwood and Partners [308]	4915	Hume Planning Consultancy (Alister Hume)	Developers or Agents	Suggests Policy S5 should reference within its wording "having regard to the strategic allocations" so development within these areas is acknowledged and there is consistency between the policies. This is recognised elsewhere at Para 4.6.11	Regulation 19 Consultation		Paragraph 5			
Online	308	Online (OPUS)	F D Attwood and Partners [308]	4916	Hume Planning Consultancy (Alister Hume)	Developers or Agents	Suggests at paras 4.7.2 - 4.7.7 the influence of the setting of the National Landscape should take account of the Lidsing Garden Community. para 14.8.1 also overplays the National Landscape setting	Regulation 19 Consultation		Paragraph 7 - Chapter 4			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.202	File V	Friends of Broomhill	SDLP 1307	N/A	Voluntary and Community Organisations	Unlike Rede Common, Broomhill has not been hatched as a local nature reserve (not even the Old Orchard), and not hatched the same as The Vines in Rochester, i.e. as a Registered Park. Yet the park has won many Green Flags, and the Old Orchard was awarded a Gold from Kent Wildlife Trust in 2024 in the Wilder Kent category. Request that the policy map is revised so that the park is hatched as a Registered Park. If this is not possible, then to provide a new hatch for parks that are not determined Registered Parks but have high status, e.g. awarded the Green Flag. We would also like to have the parkland named and show the boundary of the full extent of the enlarged park, which we hope to completed in Spring 2026.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South West	Revision to policy map so that Broomhill is marked as Registered Park. Add name of Park.		
Email	E.202	File V	Friends of Broomhill	SDLP 1308	N/A	Voluntary and Community Organisations	Severe concerns about Policy SA6: Land West of Strood. Areas SNF1, SNF3 and SR5 are Grade 1 agricultural land. Contradicts policy T14: Rural Economy. Policy states other areas with lower grade agricultural land or brownfield sites should be considered before Grade 1 and/or 2 land is allocated. Gravesham Borough Council's proposal to allocate Chapter Farm land for residential units. Gravesham allocation may not end up incorporating the farm, which would leave Medway Council's proposal left on its own; isolated and breaking its own policy criteria.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Request removal of Policy SA6 from the draft Local Plan.		
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 704	N/A	Voluntary and Community Organisations	Infrastructure Delivery and monitoring evidence are legally inadequate.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 705	N/A	Voluntary and Community Organisations	DTC - Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate			No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 706	N/A	Voluntary and Community Organisations	Reg 18 and 19 consultation procedurally defective.	1. Overview				No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 707	N/A	Voluntary and Community Organisations	Numerous policies non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 708	N/A	Voluntary and Community Organisations	Non conformity with Hoo St Werburgh & Chattenden NP. Local Plan conflicts with Neighbourhood Plan policies on infrastructure, landscape, community facilities and housing.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 709	N/A	Voluntary and Community Organisations	SA fails to legally satisfy SEA Directive,	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal		No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 710	N/A	Voluntary and Community Organisations	HRA is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment		No	
Email	E.127	File V	Friends of Deangate Ridge Country Park Committee	SDLP 711	N/A	Voluntary and Community Organisations	Querying allocations on Hoo Peninsula, insufficient infrastructure proposed, poor roads, concern over air pollution/quality and impact on health, impact on environment	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1279	N/A	MPs, Members and Parish Councils	Strood West – not formally allocated by GBC. Substantial upgraded required first 'Highway infrastructure improvements'. Retain site for greenbelt. Allocation is contrary to policy T14. Policy SA6 – need funding for local community infrastructure – playing pitches, recreational facilities, sports centre, school GP.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1280	N/A	MPs, Members and Parish Councils	Frindsbury Peninsula Opportunity Area – lacking of clear funding, impacts, impact on Four Elms roundabout via displaced businesses relocating to Kingsnorth.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area			
Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1281	N/A	MPs, Members and Parish Councils	Inadequate planning for or securing the essential funding, infrastructure and supporting measures required to ensure the safe and sustainable delivery of development.	1. Overview	1.3 How the plan has been prepared	Evidence base: Infrastructure Delivery Plan			
Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1282	N/A	MPs, Members and Parish Councils	The proposal to introduce additional residential development in and around the A289 and Four Elms Hill—areas already experiencing dangerously poor air quality—poses a serious risk to the health and wellbeing of both current and future residents. This approach raises significant public health concerns, particularly given the existing exceedances of safe air quality thresholds. Air quality: Four Elms AQAR is out of date, linked to HRA	4. Natural Environment	4.10 Air quality	Paragraph 4.10.1			
Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1283	N/A	MPs, Members and Parish Councils	Strood West (SA6) and Medway City Estate (SA13) - no evidence of site specific air quality assessments - north will generate significant additional vehicle movements. Need environmental mitigation for health reasons.	4. Natural Environment	4.10 Air quality	Paragraph 4.10.2			

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Email	E.192	File R	Frindsbury Extra Parish Council	SDLP 1284	N/A	MPs, Members and Parish Councils	The Medway Air Quality Action Plan 2024 identifies road traffic as the main source of nitrogen dioxide (NO ₂) pollution on major roads such as the A289 and City Way. The Action Plan proposes mitigation measures Bus fleet electrification/Implementation of Medway's Electric Vehicle Strategy/Transitioning the Council's fleet to low-emission vehicles/Increased uptake of active travel. None of these measures are likely to sufficiently reduce emissions along the A289 to counteract the cumulative impact of the	4. Natural Environment	4.10 Air quality	Paragraph 4.10.1			
Email	E.96	File L	Gary Teague	SDLP 333	N/A	Members of the Public	The proposal is unsuitable due to increased traffic and was previously rejected for similar reasons. Adding a medical centre is impractical amid GP shortages, and new schools may worsen congestion. The revised plan fails to address core infrastructure concerns, making it even less viable than earlier proposals and risking further strain on local services	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.152	File E	Gladman	SDLP 865	N/A	Developers or Agents	Local Plan period needs to start 2025 and be extended by one year to 2041/42.	1. Overview	1.3 How the plan has been prepared		Extend plan period by one year		
Email	E.152	File E	Gladman	SDLP 866	N/A	Developers or Agents	Level of housing supply not sound. Supply will not cover extended period- windfall supply overestimated.	1. Overview	1.3 How the plan has been prepared				
Email	E.152	File E	Gladman	SDLP 867	N/A	Developers or Agents	Housing supply shortfall of 625 units.	1. Overview	1.3 How the plan has been prepared				
Email	E.152	File E	Gladman	SDLP 868	N/A	Developers or Agents	Affordable housing viability issues especially linked to PDL sites.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Need to allocate more g/f sites.		
Email	E.118	File B	Gleeson Land	SDLP 573	Marrons (Josh Mellor)	Developers or Agents	Raises issue of addressing gaps within the Infrastructure Delivery Plan.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.118	File B	Gleeson Land	SDLP 574	Marrons (Josh Mellor)	Developers or Agents	Need to provide clarity on which sites are likely to contribute towards necessary infrastructure and the expected contribution requirements for allocated and non-allocated sites.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.118	File B	Gleeson Land	SDLP 575	Marrons (Josh Mellor)	Developers or Agents	The Plan period being modified to cover the required 15-year period post adoption (including necessary changes to housing requirement).	1. Overview	1.3 How the plan has been prepared				
Email	E.118	File B	Gleeson Land	SDLP 576	Marrons (Josh Mellor)	Developers or Agents	Further consideration of a housing requirement set at a level above minimum housing need, including consideration of the spatial distribution and site selection which would reflect this. Querying GBC unmet housing need request for 2k , cross border working and lack of coordination via Duty to Cooperate	1. Overview	1.4 Duty to Cooperate				
Email	E.118	File B	Gleeson Land	SDLP 577	Marrons (Josh Mellor)	Developers or Agents	Explanation sought over decrease in affordable housing requirement between current and previous LHNAs and clarification within the Plan of which areas are considered "high value" and "lower value" for affordable housing	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing			
Email	E.118	File B	Gleeson Land	SDLP 578	Marrons (Josh Mellor)	Developers or Agents	Addition of information within the Plan clearly setting out the components of housing supply and the anticipated Plan trajectory - with reference to use of brownfield and greenfield sites and viability	3. Spatial Development Strategy	3.1 Overview		Addition on information on components of housing supply		
Email	E.118	File B	Gleeson Land	SDLP 579	Marrons (Josh Mellor)	Developers or Agents	Consideration of realistic delivery rates for housing sites including identifying more sites which can deliver in the short and medium-term	3. Spatial Development Strategy	3.1 Overview		More housing sites for delivery in short/medium term.		
Email	E.118	File B	Gleeson Land	SDLP 580	Marrons (Josh Mellor)	Developers or Agents	Removing Green Belt allocations on the basis exceptional circumstances is not justified.	4. Natural Environment	4.12 Green Belt				
Email	E.121	File B	Goodman	SDLP 617	Stantec (Hardeep Hunjan)	Developers or Agents	Noting update to ELNA.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Include ref to current ELNA and subsequent ELNA within policy		
Email	E.121	File B	Goodman	SDLP 618	Stantec (Hardeep Hunjan)	Developers or Agents	See suggested amendment	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision	Policy S11 identify sites HHH37, HHH38 and HHH39 as existing employment areas on proposals map.		
Email	E.121	File B	Goodman	SDLP 619	Stantec (Hardeep Hunjan)	Developers or Agents	See suggested amendment	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites	Policy S12 include wording: Brownfield sites (including London Medway Commercial Park and Medway One) are phased before greenfield sites (including Kingsnorth Expansion Area). as per site allocation Policy SA14.		
Email	E.121	File B	Goodman	SDLP 620	Stantec (Hardeep Hunjan)	Developers or Agents	Policy SA14 - raises issue of phasing of potential further employment sites should be towards latter part of plan period to enable delivery of existing employment allocations. See suggested amendment	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	Kingsnorth Expansion Area shall be developed during the latter part of the plan period, i.e. after employment sites on previously developed land have been occupied. Development shall align with the timescales set out in the 'Site-specific information' table included within this policy		
Email	E.121	File B	Goodman	SDLP 621	Stantec (Hardeep Hunjan)	Developers or Agents	See suggested amendment	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Make clear that unrestricted 24-hour use of Stoke Road and Ropers Lane will be safeguarded for users of LMCP and other employment activities in the wider Kingsnorth Area. Mix and distribution of proposed uses should avoid the potential for conflict between the new development (i.e. residents) and existing commercial traffic; Make provision for buffer areas and screening between Ropers Lane and Stoke Road and the proposed residential development. Make reference to the existing strategic employment sites at Kingsnorth (as well as the Kingsnorth Expansion Area) as referenced in policy SA14		
Email	E.91	File L	Gordon Smith	SDLP 318	N/A	Members of the Public	Need for Article 4 as part of planning policies for HMOs.	6. Housing	6.8 Houses of multiple occupation	Policy T8: Houses of Multiple Occupation			

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Email	E.48	File L	Graham Page	SDLP 191	N/A	Members of the Public	Would also like to see new houses being built which are targeted to be affordable for younger generations and people on average wages.	6. Housing	6.3 Affordable housing				
Email	E.48	File L	Graham Page	SDLP 192	N/A	Members of the Public	Infrastructure of roads, hospital beds, GPs, emergency services, and possibly even new supermarket food stores should be mandatory for any house building approval	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.191	File U	Gravesham Borough Council	SDLP 1274	N/A	Statutory Bodies	Support LP * Raises the importance of getting infrastructure in place to support the planned growth.	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.191	File U	Gravesham Borough Council	SDLP 1275	N/A	Statutory Bodies	Support LP * Welcome the continued joint working on cross boundary matters including housing, employment, transport, infrastructure, education and habitat sites, etc. * It is noted that Medway's Reg 19 precedes clarification of Gravesham Council's strategy in relation to up-to-date evidenced development needs in Gravesham's Draft Reg 19.	1. Overview	1.4 Duty to Cooperate				
Email	E.191	File U	Gravesham Borough Council	SDLP 1276	N/A	Statutory Bodies	Support LP * Welcome the objective and vision and draws upon KCC plans and programmes.	2. Vision and Strategic Objectives					
Email	E.191	File U	Gravesham Borough Council	SDLP 1277	N/A	Statutory Bodies	Support LP * Note the consideration given to meeting Gravesham's unmet need as set out in the Sustainability Appraisal.	1. Overview	1.4 Duty to Cooperate				
Email	E.191	File U	Gravesham Borough Council	SDLP 1278	N/A	Statutory Bodies	Support LP * Both authorities have worked constructively, commissioning evidence and engaged constructively through duty to cooperate discussions. This includes both authorities working together on Site Allocation SA6: Strood West in Medway's Local Plan.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.160	File H	Habinteg Housing Association	SDLP 922	N/A	Developers or Agents	Policy T4 – * include accessibility design standards, specifically M4(2) and M4(3) of the building regs. * a defined percentage of new homes (10% as a starting point) should be specified to M4(3) standards in order to meet the current and future needs of the population of wheelchair users. Moreover, mandating for 100% or all other (non-M4(3) homes to meet the M4(2) standards offers older people a better choice of accommodation to suit their changing needs helping them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. * Accessibility requirements should not be limited to specialist or affordable housing.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Habinteg strongly recommends that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3). M4(2) is essential for delivering inclusive, future-proof homes that support ageing in place and any adaptations that may be required over the lifetime of the home. This standard meets the needs of a wide range of residents, including older people and many disabled people. Hence, we recommend that 100%/ all new homes are built to the M4(2) standard. M4(3) standard homes are designed with the long term needs of wheelchair users in mind. These must be prioritised on any local plan to address the critical shortage of wheelchair-accessible housing. Hence, we recommend that 10% of new homes are built to the M4(3) standard.	No	
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 894	David Lock Associates (Arwel Owen)	Developers or Agents	The Council proposes to make use of S.106 agreement (paragraph 10.5.8) in place of CIL (paragraph 10.5.9) and notes pooling is expected to provide ineffective mechanism (paragraph 9.2.7). Given the extensive and varied infrastructure obligations, greater certainty is required about how complex contribution and delivery mechanisms will be coordinated, and offer greater clarity to substantiate the delivery trajectory which the Council has set out.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 895	David Lock Associates (Arwel Owen)	Developers or Agents	Consideration of this site should have been captured in section 3 of the DiC - specifically with regard to engagement with Tonbridge and Malling BC on this strategic site. There appears to have been limited engagement with T&MBC compared to GBC on strategic cross boundary sites. There is no SoCG with T&MBC. The approach is therefore inconsistent.	1. Overview	1.4 Duty to Cooperate		demonstrate in updated and published evidence that it has engaged Tonbridge and Malling Council positively and proactively, and that it has done so without prejudice to the Council's views (which we dispute) of the suitability of the Holborough Quarry site as a cross-boundary opportunity.		
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 896	David Lock Associates (Arwel Owen)	Developers or Agents	Support but plan period needs adjusting. It is currently less than 15years. Also needs to clarify when the plan period starts, i.e., after adoption. Overall, the local plan period should start at 2025/26 and look up to 2041/42 to ensure that it is consistent with national policy. Based on the Local Housing Need of 1,636 homes per annum, this equates to 26,176 homes over the plan period.	2. Vision and Strategic Objectives	2.1 Vision				

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Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 897	David Lock Associates (Arwel Owen)	Developers or Agents	* The spatial development strategy is neither the most sustainable nor deliverable, raising significant concerns that reliance on some of these sites will inevitably lead to a shortfall in meeting housing need if carried forward. * The plan period is also miscalculated. * There's a reliance on sites with known deliverability challenges and complicated to deliver. * 7 site allocations in rural locations are inconsistent with the vision * Some sites perform badly in sustainability terms and require substantive investment	3. Spatial Development Strategy					
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 898	David Lock Associates (Arwel Owen)	Developers or Agents	Principles of sustainable development, national planning policy and the provisions of Policy S1, directs development first to locations which are least constrained. The Spatial Development Strategy does not do that, and so the requirements of Policy S1 cannot be met. The Policy is therefore inconsistent with other parts of the plan, inconsistent with national policy, and is therefore not justified.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 899	David Lock Associates (Arwel Owen)	Developers or Agents	The Council's Interim Habitat Assessment cannot conclude whether the air quality impacts of development at the Hoo Peninsula will or will not impact upon the integrity of the North Kent Marshes European Sites (paragraphs E6 and E11 refer). It would be preferable, in sustainability and economic terms, to focus development on sites which do not require such extensive mitigation. Policy S2 cannot therefore be demonstrably met by the spatial strategy on the evidence available. The Policy cannot be found to be effective as the Plan, as a whole, is currently presented.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 900	David Lock Associates (Arwel Owen)	Developers or Agents	Given the conclusion set out in the Interim Habitat Assessment that adverse air quality and recreational disturbance impacts on designated habitats cannot be ruled out, the efficacy of the measures proposed in Policy S3 can be challenged. At present, the evidence does not demonstrate that Policy S3 will be effective.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 901	David Lock Associates (Arwel Owen)	Developers or Agents	The extensive areas of blue, which appear in areas such as the Capstone Valley and Medway Valley extend some distance from rivers, are not explained, justified nor evidenced. The blue areas do not appear in the key for the plan. Policy S5 cannot be effective nor can it be justified if it relies on areas which are defined without explanation, purpose or where their function is not explained.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 902	David Lock Associates (Arwel Owen)	Developers or Agents	Despite the distance between the urban area of Medway and Snodland being very similar, this relationship is barely mentioned. Where it is addressed, it is done so incorrectly. The release of Holborough Quarry from the Green Belt needs to be considered in the context of the cross-boundary opportunity with TMBC and the Concept Masterplan.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 903	David Lock Associates (Arwel Owen)	Developers or Agents	The spatial strategy appears disjointed, with losses of employment land assumed to be offset by land which the Council's own evidence considers less suitable. The Economic Strategy needs to explicitly address the relocation of existing users at the Medway City Estate if a regeneration strategy is to be justified for that location.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 904	David Lock Associates (Arwel Owen)	Developers or Agents	However, Policy S22 does not set out the need for early delivery of facilities (which would address unsustainable travel patterns), nor does the Policy address the conflict between early provision – which engenders sustainable travel habits – and the commercial need for critical population mass to support delivery. Parts of the network around the Hoo Peninsula raises significant highways concerns, even in post-mitigation measures.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 905	David Lock Associates (Arwel Owen)	Developers or Agents	Whilst the safeguarding of the line is important, we note that the considerable funding deficit means that there is limited prospect of any immediate upgrade, and that the prospects of establishing fully sustainable travel patterns at the Hoo Peninsula are therefore diminished.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 906	David Lock Associates (Arwel Owen)	Developers or Agents	No mechanism is set out for achieving agreement, nor for its implementation. Paragraph 9.11.8 of the Plan provides little further indication of how the travel plan is to be prepared. Without clarity and certainty, it cannot be concluded that Policy DM18 will be effective.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			

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Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 907	David Lock Associates (Arwel Owen)	Developers or Agents	Concerned that some sites are likely to be challenging to deliver. Furthermore, our representations are supported by a Transport Technical Note (DHA, August 2025) which demonstrates that parts of the network around the Hoo Peninsula raises significant highways concerns, even in post-mitigation scenarios. It remains unclear how these matters will be mitigated without undermining the sustainability and transport objectives of the Draft Local Plan. This needs to be clearly addressed to ensure deliverability, and absence of this detail makes this Policy	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 908	David Lock Associates (Arwel Owen)	Developers or Agents	Support the ambition of wanting to deliver 620 dwellings. The lengthy delay in their delivery indicates that complexity, commerciality and market factors can lead to significant delays in delivery. Whilst we support the identification of sites for renewal, caution is needed with respect to the delivery trajectory proposed for sites assumed to deliver in the first five years of the Plan.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 909	David Lock Associates (Arwel Owen)	Developers or Agents	We support the objectives and ambition for renewal at Strood, but are concerned that sites SNF8 and SNF41 (which have a combined capacity of 236 dwellings) are anticipated to deliver in the first part of the Plan period, despite having been allocated in the 2004 Medway Local Plan and appear to have no current formal planning application activity. Whilst we support the delivery of renewal sites, reliance on early delivery is not credible.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 910	David Lock Associates (Arwel Owen)	Developers or Agents	It is not clear, however, how that infrastructure is to be coordinated. Policy S24 does not set out a coordination mechanism, with reliance seemingly placed on pooled s.106 contributions (paragraph 9.2.7). It is also not clear how the development as a whole is to be coordinated. Policy SA8 indicates that a Planning Framework will be prepared to inform planning applications, but no clarity is provided with respect to the preparation, approval or status of that document. It is therefore not clear how applications will in fact be provided to the Council.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.157	Files F & G	Hallam Land (acting for Tarmac and Holcim UK)	SDLP 911	David Lock Associates (Arwel Owen)	Developers or Agents	Whilst 690 homes are identified as deliverable within the Plan period, it is not clear what the overall capacity of the area is. It is also unclear how and where existing employment will be relocated. Infrastructure needs is not identified.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area			
Email	E.178	File R	Halling Parish Council	SDLP 1149	N/A	MPs, Members and Parish Councils	* Traffic issues and lack of parking on our main streets have been an issue. * There is also significant pressure on the A228 through our parish and additional pressures are expected following the development and operation of the Lower Thames Crossing and any major works on Bluebell Hill which are likely to have a major impact on our parish.	9. Transport				Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1150	N/A	MPs, Members and Parish Councils	We note there are no housing allocations in the parish, but may still be affected by developments in Tonbridge and Malling/Snodland and will need to monitor that situation.	14. Site Allocations				Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1151	N/A	MPs, Members and Parish Councils	In addition to the North Downs National Landscape to the west/north/south and welcome the protection in the Local Plan. We also have the Halling Marshes to the East, down to the River Medway which, although covered within the environmental sensitive areas (Sites of Special Scientific Interest (SSSI) are also worthy of specific mention and protection.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites		Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1152	N/A	MPs, Members and Parish Councils	We support the environmental policies.	4. Natural Environment				Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1153	N/A	MPs, Members and Parish Councils	We support the objectives of the plan.	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1154	N/A	MPs, Members and Parish Councils	Acknowledge the Legal Compliance of the Medway Local Plan 2041, although consultation at Regulation 19 has been reduced to a minimum and not allowed full investigation of significant changes that were introduced for the first time at this stage.	Regulation 19 consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan			Yes	If necessary
Email	E.178	File R	Halling Parish Council	SDLP 1155	N/A	MPs, Members and Parish Councils	We recognised that the plan still has missing evidence-based documentation that will need to be completed before the submission to the planning inspector, we have been assured by the Medway Local Plan team that this will be done, although not available at Regulation 19.	1. Overview	1.3 How the plan has been prepared	Evidence base		Yes	If necessary
Email	E.106	File L	Hazel Champness	SDLP 458	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Email	E.106	File L	Hazel Champness	SDLP 459	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Email	E.106	File L	Hazel Champness	SDLP 460	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Email	E.106	File L	Hazel Champness	SDLP 461	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.106	File L	Hazel Champness	SDLP 462	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.106	File L	Hazel Champness	SDLP 463	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Email	E.106	File L	Hazel Champness	SDLP 464	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.106	File L	Hazel Champness	SDLP 465	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.109	File L	Helen Hammond	SDLP 469	N/A	Members of the Public	Concern about the level of development and the subsequent loss of green spaces.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email	E.2	File L	Helen Leydon	SDLP 2	N/A	Members of the Public	Objection to Reclassification: Strong concerns about reclassifying Greenbelt land north of Red Court Road and Brompton Farm Road to "Grey belt," which contradicts its current use and planning policy. Medway's own Green Belt Review confirms the land makes a high contribution to Greenbelt purposes, yet it's being reclassified without clear justification	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.2	File L	Helen Leydon	SDLP 3	N/A	Members of the Public	The draft Local Plan fails to meet NPPF requirements for accessible green spaces near new housing. Urges the Council to reconsider the decision and further justify the reclassification based on evidence	4. Natural Environment	4.6 Securing strong green and blue infrastructure				
Email	E.94	File L	Henry Langley	SDLP 323	N/A	Members of the Public	Supports policy DM3 and urges stronger transport objectives, emphasizing reduced congestion and enhanced air quality, rising asthma rates and serious pollution alerts in Rainham High Street's Air Quality Management Area. Concern over heightened water stress and demands Southern Water action	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			
Email	E.94	File L	Henry Langley	SDLP 324	N/A	Members of the Public	Not in support of Capstone Valley and Lower Rainham housing.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Email	E.94	File L	Henry Langley	SDLP 325	N/A	Members of the Public	Resident urges conservation of Medway's green spaces and historic orchards.	4. Natural Environment	4.6 Securing strong green and blue infrastructure				
Email	E.94	File L	Henry Langley	SDLP 326	N/A	Members of the Public	Urges inclusion of bungalows for the elderly.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation			
Email	E.94	File L	Henry Langley	SDLP 327	N/A	Members of the Public	Not in support of Lower Rainham housing.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email	E.94	File L	Henry Langley	SDLP 328	N/A	Members of the Public	Supports DM20, particularly having proper facilities for bikes.	9. Transport	9.12 Parking				
Email	E.94	File L	Henry Langley	SDLP 329	N/A	Members of the Public	Maidstone Road has poor quality pavements with cars parked on pavements and urges banning of e-scooters.	9. Transport					
Email	E.94	File L	Henry Langley	SDLP 330	N/A	Members of the Public	Concern over lack of infrastructure, need for commitment to supporting public transport	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hard copy	H.59	File R	High Halstow & St Mary Hoo Parish Council	SDLP 1856	N/A	MPs, Members and Parish Councils	Support the new Local Plan, especially Deangate Parkland, but believes the spatial strategy is legally flawed, environmentally harmful, and inconsistent with national policy. Sustainable planning, prioritizing brownfield sites over greenfield development should be sought first, especially at High Halstow, and stresses the need for a valid evidence base to support future housing growth.	3. Spatial Development Strategy					
Hard copy	H.59	File R	High Halstow & St Mary Hoo Parish Council	SDLP 1857	N/A	MPs, Members and Parish Councils	The proposed development threatens Medway and Swale SPA, worsens air pollution at Four Elms Hill, and disregards public health, wildlife protection, and heritage, raising serious concerns about environmental and planning sustainability	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			
Hard copy	H.59	File R	High Halstow & St Mary Hoo Parish Council	SDLP 1858	N/A	MPs, Members and Parish Councils	Concern over infrastructure limitations on the Hoo Peninsula, particularly reliance on a single arterial road, and endorse Save Hoo Peninsula's concerns. Criticizes allocating development to remote villages lacking infrastructure. Despite reduced housing targets, the strategy remains undeliverable without committed investment, violating national planning standards	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hard copy	H.60	File R	High Halstow Parish Council	SDLP 1859	N/A	MPs, Members and Parish Councils	High Halstow's Climate Group supports Medway's Local Plan focus on climate change but urges stronger net zero commitments, renewable energy policies, flood risk updates, and mandatory biodiversity targets, to ensure legal compliance and effectiveness. Urges Medway Council to strengthen its Local Plan with enforceable climate measures, annual reviews, and nature-based solutions.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Hard copy	H.60	File R	High Halstow Parish Council	SDLP 1860	N/A	MPs, Members and Parish Councils	Questions housing growth on Hoo Peninsula due to withdrawn infrastructure funding and limited capacity, citing past cabinet decisions and monitoring reports showing low sustainable housing numbers	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hard copy	H.18	File V	Hindu Community of Medway	SDLP 1466	N/A	Voluntary and Community Organisations	Due to a growing Hindu population and lack of existing facilities, we advocate for the allocation of suitable land in Medway to develop an integrated Hindu Temple and Cultural Centre, consisting of; a traditional Hindu Temple, community and cultural centre, programs for the elderly, resource centre for cultural education, multipurpose hall with parking and accessibility infrastructure	10. Health, communities and Infrastructure	10.4 Community facilities		Advocate for the allocation of suitable land in Medway to develop an integrated Hindu Temple and Cultural Centre.		
Email	E.79	File U	Historic England	SDLP 242	N/A	Statutory Bodies	Heritage at risk and local list assets needs more of an emphasis. HE would like a separate policy on this. It ties back to the national key performance indicators.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	new policy or amend text in policy and include wording in monitoring framework.	No	
Email	E.79	File U	Historic England	SDLP 243	N/A	Statutory Bodies	Designated Heritage assets and non-designated heritage assets needs to be distinguishable, i.e. requirements of designated heritage assets would apply to undesignated heritage assets, which is not appropriate.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	Discrete policy for undesignated heritage assets or amend within policy to distinguish between the two. Additional amends to policy on designated heritage assets: * para 3 - include 'total' to read total loss * para 4 - replace: 'The demolition or other loss' with 'total demolition' or 'total loss' * Para 4, 2nd line, insert: 'total' before 'loss of a heritage....' * Para 4, 2nd line, replace: 'developer' with 'applicant' * Para 5, insert: 'Development proposals for cases of less than substantial harm shall demonstrate.....'	No	
Email	E.79	File U	Historic England	SDLP 244	N/A	Statutory Bodies	Suggest inclusion of other sites within policy criterion	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites	Under 3 Star Hill to Sun Pier add FP11 and FP12 for d(i) and d(ii)	No	
Email	E.79	File U	Historic England	SDLP 245	N/A	Statutory Bodies	Suggested changes to clarify historic environment considerations.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Replace bullet 9 with: 'Proposals should be informed by a thorough understanding of the historic environment including how the development site contributes to the significance of nearby designated and undesignated heritage. Proposals should seek to avoid and minimise harm and reinforce and reveal historic significance wherever possible.'	No	
Email	E.79	File U	Historic England	SDLP 246	N/A	Statutory Bodies	Suggest additional text requiring the masterplan to be informed by a thorough understanding of the historic environment. Strood sites could include unlisted historic buildings. Retention and reuse of such buildings would be helpful in the strategic policy.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds	Additional text suggestion:..... to require the masterplan to be informed by a thorough understanding of the historic environment. Some TC's could include unlisted historic buildings. Suggested change to include: 'Retention and reuse of historic buildings would reinforce the historic environment'.	No	
Email	E.79	File U	Historic England	SDLP 247	N/A	Statutory Bodies	Redevelopment of the Peninsula places the river at the heart of Medway as a place, includes many highly graded buildings and is a prominent parcel of land. Suggested amends to reflect the importance of heritage	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	Bullet 3: replace: 'Have regard' with '...seek to avoid or minimise harm and reinforce and reveal the significance of.....'	No	
Email	E.79	File U	Historic England	SDLP 248	N/A	Statutory Bodies	Screening of Chatham Waters (SM16) will inform an understanding of the sites historic interests and value and help de-risk future development. Suggest expanding on bullet 14 regarding reference of the historic environment within bullets 3 and 6.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	Amend bullet 3 to reference the historic environment. Amend bullet 6 to include reference to the historic and natural landscape (in relation to building heights and consideration of skyline). Add additional bullet point: '....celebrating and reinforcing/enhancing the historic character and surviving historic features within the site '	No	
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 249	N/A	Developers or Agents	It would appear from the evidence submitted that the Council has co-operated with its neighbours. This co operation will need to continue as new plans are prepared in neighbouring areas. In particular the Council will need to engage fully with Tonbridge and Malling BC with regard to the potential for cross border development to ensure they can meet their housing needs in full. The Council should recognise that this co-operation may lead to a partial review of the local plan.	1. Overview	1.4 Duty to Cooperate			Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 250	N/A	Developers or Agents	Concerns over soundness - suggest plan period extended to 2042	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Suggest plan period extended to 2042.	Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 251	N/A	Developers or Agents	Some of the policies, are lengthy suggest trying to simplify the language and avoid repetition or unnecessary phrases wherever possible. Also suggest that each paragraph within a policy is numbered for the ease decision makers and applicants in identifying which part of the policy they are referring to in reports, planning applications and supporting statements	1. Overview			Suggest simplifying language, avoiding repetition and numbering each paragraph within policies.	Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 252	N/A	Developers or Agents	Spatial Strategy - Housing requirement and trajectory - The local plan is inconsistent with national policy as it does not include a strategic policy setting out the housing requirement of trajectory	3. Spatial Development Strategy	3.1 Overview			Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 253	N/A	Developers or Agents	Meeting housing need - The plan is unsound as the level of supply proposed by the Council is not fully justified and the Council will not meet housing needs over a policy compliant plan period. Contend a shortfall of at least 400 homes is due to the Council ignoring housing needs from the point at which housing needs are assessed and the shortfall of 625 homes in that year. Believe the Council have instead chosen to ignore this year and start the plan period form the year they expect to adopt the local plan – a decision HBF consider to be inconsistent with the approach to assessing housing needs and as such unsound.	1. Overview	1.3 How the plan has been prepared			Yes	To speak on the matters raised in our representations

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 254	N/A	Developers or Agents	HBF are concerned that the windfall supply is overestimated. Main concern relates to the figure for prior notifications which includes a figure of 308 units in 2023/24 which inflates the average from 16.7 for the previous 9 years to 45.9 over 10 years. This is clearly an outlier in terms of what has been delivered in the past and cannot be relied on to justify the level of windfall being proposed. HBF would recommend that this outlier is removed and the average delivery rate for the period 2014/15 to 2023/24 of 16.7 is used. This results in a total windfall of 103 dpa. This reduces supply over the proposed plan period by 384 homes leaving a shortfall of 125 homes. Over the extended plan period HBF considers to be sound the shortfall increases to 786 homes.	1. Overview	1.3 How the plan has been prepared			Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 255	N/A	Developers or Agents	HBF are concerned that the level of housing supply in the first five years of the plan is not justified. Concerned there is insufficient evidence to suggest that two of the larger PDL sites (GN6 and GN15) allocated for development in the local plan will be delivered in the first five years of the plan period, particularly given the challenging economic viability for such sites that is highlighted in the Viability Assessment.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 256	N/A	Developers or Agents	HBF are concerned that the level of housing supply in the first five years of the plan is not justified. Concerned there is insufficient evidence to suggest that two of the larger PDL sites (GN6 and GN15) allocated for development in the local plan will be delivered in the first five years of the plan period, particularly given the challenging economic viability for such sites that is highlighted in the Viability Assessment.	3. Spatial Development Strategy	3.1 Overview			Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 257	N/A	Developers or Agents	HBF are concerned that the Council has not identified 10% of the housing requirement will be delivered on small sites of less than one hectare. Supply in the LAA indicates that 1,926 homes will be delivered on sites of less than once hectare, circa 500 fewer than the council is required to plan for.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders		Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 258	N/A	Developers or Agents	HBF are concerned that the strategy will limit the amount of affordable housing that will be delivered. The viability assessment shows that many of the allocated sites in this local plan will struggle to deliver any affordable housing. This is principally down to the level of infrastructure contributions that the Council is expecting development to deliver. Suggests the Council; allocates more greenfield sites.	3. Spatial Development Strategy	3.1 Overview			Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 259	N/A	Developers or Agents	HBF are concerned that the strategy will limit the amount of affordable housing that will be delivered. The viability assessment shows that many of the allocated sites in this local plan will struggle to deliver any affordable housing. This is principally down to the level of infrastructure contributions that the Council is expecting development to deliver. Suggests the Council; allocates more greenfield sites.	6. Housing	6.3 Affordable housing		Suggests the Council; allocates more greenfield sites and reduces infrastructure contributions expected.	Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 260	N/A	Developers or Agents	HBF strongly supports the inclusion of this policy (T11) in the local plan.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders		Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 261	N/A	Developers or Agents	Suggest that more sites need to be allocated in order to offset the limited amount of affordable housing that will be delivered in lower value areas. Policy T3's second bullet point is unclear as to whether the 10% applies to all residential development on PDL or just PDL sites in the lower value areas. Suggest that a separate bullet is provided to set out expectations as to affordable housing delivery on PDL sites. Also considers it to be unsound to reference to the values areas that are set out in the viability assessment. These value zones should be set out in the local plan and policies map to ensure the necessary clarity	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Suggest that a separate bullet is provided to set out expectations as to affordable housing delivery on PDL sites.	Yes	To speak on the matters raised in our representations
Email	E.80	File B	Home Builders Federation (HBF)	SDLP 262	N/A	Developers or Agents	The final bullet point of the policy is unsound as it is unjustified. Suggested amended wording provided.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	If any plot(s) remain unsold after being marketed for the minimum period, they can either remain for sale as a self/custom build plot or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before they will revert ing back to the land owner to build built out as market housing on the plot or cell without restriction.	Yes	To speak on the matters raised in our representations
Email	E.176	File J	Homes England (Chattenden Barracks)	SDLP 1119	WSP (Sam Oguz)	Developers or Agents	The Plan seeks to deliver 24,540 homes over the plan period through a blended growth strategy that prioritises brownfield land. However, it proposes a housing buffer of just 203 dwellings - less than 1%, which is extraordinarily tight and provides no meaningful contingency for under-delivery. The Plan is also heavily reliant on the delivery of complex and back-loaded strategic sites.	1. Overview	1.3 How the plan has been prepared				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.176	File J	Homes England (Chattenden Barracks)	SDLP 1120	WSP (Sam Oguz)	Developers or Agents	Omission of site HHH3 from the current Regulation 19 Draft Plan, attributed to "uncertainty surrounding the potential ecological impact," (as stated in the 2025 Local Plan Sustainability Appraisal Volume 3, Appendix J.1, p. 550) is therefore considered to render the Plan unsound.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.176	File J	Homes England (Chattenden Barracks)	SDLP 1121	WSP (Sam Oguz)	Developers or Agents	Inconsistencies in approach in how Chattenden Barracks has been considered in the Draft Plan compared to the allocation of other residential led sites in the vicinity.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal	Chattenden Barracks (HHH3) is allocated within the Local Plan as a strategic site.		
Email	E.176	File J	Homes England (Chattenden Barracks)	SDLP 1122	WSP (Sam Oguz)	Developers or Agents	The Sustainability Appraisal is reviewed to ensure consistency in the assessment of ecological impacts across comparable sites.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.176	File J	Homes England (Chattenden Barracks)	SDLP 1123	WSP (Sam Oguz)	Developers or Agents	The Plan includes a clear mechanism as to how a coordinated and deliverable SEMS strategy is being taken forward and how that aligns to longer term land being made 'acceptable' for development.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.185	File K	Homes England (Lodge Hill Camp)	SDLP 1235	WSP (Sam Oguz)	Developers or Agents	Homes England object to non-allocation of site HHH1 and believes the Local Plan is unsound as a result.	1. Overview	1.3 How the plan has been prepared				
Email	E.184	File K	Hoo Consortium	SDLP 1169	Stantec (Alex Jones)	Developers or Agents	To retain and attract committed developers to invest in Medway, the expectations on developments to contribute to and directly deliver infrastructure must be justified, proportionate and underpinned by robust evidence and assessment to the scale of contributions sought through s106 must not undermine development viability ensure CIL regulation compliance. The scale of contributions sought through s106 must not undermine development viability. Where additional ('gap') funding is required, this should be clearly set out and funding sources/ mechanisms identified. Also of relevance is the mechanism for funding phased delivery where the required level of s106 contributions may not be available at the point needed but will be available at	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.184	File K	Hoo Consortium	SDLP 1180	Stantec (Alex Jones)	Developers or Agents	Refinement required to the Concept Masterplan for Hoo St Werburgh and Chattenden (Figure 14) to reflect the extant applications and to Policies SA8 and SA9 to, inter alia, avoid unnecessary duplication, ensure deliverability and remove additional layers of approval.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Figure 14: Hoo St Werburgh and Chattenden Concept Plan			
Email	E.184	File K	Hoo Consortium	SDLP 1181	Stantec (Alex Jones)	Developers or Agents	Understanding the cost of achieving the Vision will be key in providing developer confidence to invest in Medway and facilitate the delivery of new homes and employment, improve quality of life and make this an attractive place to live and work.	2. Vision and Strategic Objectives	2.1 Vision				
Email	E.184	File K	Hoo Consortium	SDLP 1182	Stantec (Alex Jones)	Developers or Agents	The emerging Local Plan would benefit from a strategic policy that clearly articulates the full development needs that the Plan seeks to deliver and spatial distribution thereof.	3. Spatial Development Strategy					
Email	E.184	File K	Hoo Consortium	SDLP 1183	Stantec (Alex Jones)	Developers or Agents	The number of homes the emerging Local Plan seeks to provide for is set out in the introduction to the Plan (paragraph 1.3.6) and introduction to the Housing chapter (paragraph 6.1.2) but does not feature in any of the specific policies. There would be merit in the first policy/ policies in the Plan being strategic policies relating to the scale of development the Plan seeks to deliver and spatial strategy.	3. Spatial Development Strategy					
Email	E.184	File K	Hoo Consortium	SDLP 1184	Stantec (Alex Jones)	Developers or Agents	A simplified trajectory including windfall allowance could helpfully be included in the Local Plan. This would assist the preparation of infrastructure delivery plans, including the Hoo-specific Infrastructure Delivery Plan and supporting funding strategies.	3. Spatial Development Strategy	3.1 Overview		Simplified (housing) trajectory with windfall allowance.		
Email	E.184	File K	Hoo Consortium	SDLP 1185	Stantec (Alex Jones)	Developers or Agents	The Policies Map ought to be updated to remove the safeguarding from the Policies Map and indicate the potential location on the updated Concept Plan at Figure 14 as an aspiration rather than relate to a specific scheme that may be subject to change.	3. Spatial Development Strategy	3.2 Policies Map	Policies map - North East	Removal of safeguarded land from policies map.		
Email	E.184	File K	Hoo Consortium	SDLP 1186	Stantec (Alex Jones)	Developers or Agents	Policy DM17: Grain Branch requires modification to provide a clear release mechanism so as not to hinder/ slow delivery of Site HHH31.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch	Amendment to policy DM17 to 'provide release mechanism' for delivery of site HHH31.		
Email	E.184	File K	Hoo Consortium	SDLP 1187	Stantec (Alex Jones)	Developers or Agents	The Hoo Consortium is keen to understand the likely cost of bus service improvements. Moreover, the strategy for delivery including any engagement with bus operators on the preferred delivery model, likely phasing of service improvements and other measures to enhance the attractiveness and patronage/ viability of buses to/ from Hoo.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.184	File K	Hoo Consortium	SDLP 1188	Stantec (Alex Jones)	Developers or Agents	The Hoo Consortium would welcome the opportunity to review and comment further on the SEP once available.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.184	File K	Hoo Consortium	SDLP 1189	Stantec (Alex Jones)	Developers or Agents	Notes the relationship between air quality, improvements to sustainable transport modes (including improved bus services to the Hoo Peninsula) and reduced reliance on the private car. The Hoo Consortium's place-based vision for the Hoo Peninsula which seeks to facilitate a step-change in public transport will also have beneficial impacts on air quality.	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.184	File K	Hoo Consortium	SDLP 1190	Stantec (Alex Jones)	Developers or Agents	To support developer confidence/ certainty to bring forward development in line with the Local Plan and in a timely manner, the likely infrastructure costs would benefit from refinement. This will be important in ensuring that s106 contributions remain at a viable level and do not result in reduced levels of affordable housing, particularly as the Viability Appraisal shows that 30% is the maximum/ upper limit of affordable housing achievable with the current levels of s106 contributions on the Hoo Peninsula.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing			
Email	E.184	File K	Hoo Consortium	SDLP 1191	Stantec (Alex Jones)	Developers or Agents	There would be merit in embedding flexibility in the draft Policy in the event that demand falls. For example, removing 'no less' and requiring a fixed 4% of plots for self/ custom build 'unless demand on the Self/ Custom Build Register falls below this level in which case a lesser percentage will be sought'	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email	E.184	File K	Hoo Consortium	SDLP 1192	Stantec (Alex Jones)	Developers or Agents	The draft policy should be amended to require the phase within which the self/ custom build are to be located to be agreed but should not pre-determine that the optimum point of delivery is in an early phase	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email	E.184	File K	Hoo Consortium	SDLP 1193	Stantec (Alex Jones)	Developers or Agents	The approach of the final bullet point of draft Policy T9 is not justified The requirement to offer unsold self/ custom build plots to the local authority ought to be removed.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email	E.184	File K	Hoo Consortium	SDLP 1194	Stantec (Alex Jones)	Developers or Agents	Should be amended to allow greenfield sites to come forward in parallel to brownfield.	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites			
Email	E.184	File K	Hoo Consortium	SDLP 1195	Stantec (Alex Jones)	Developers or Agents	Should be amended to allow greenfield sites to come forward in parallel to brownfield.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Email	E.184	File K	Hoo Consortium	SDLP 1196	Stantec (Alex Jones)	Developers or Agents	Refinement is required to remove ambiguity/ inconsistency so that it is clear to developers and decision-makers how proposals for retail will be considered (in line with NPPF paragraph 16(d)). Moreover, that consistent terminology is used throughout Chapter 8	8. Retail and Town Centres					
Email	E.184	File K	Hoo Consortium	SDLP 1197	Stantec (Alex Jones)	Developers or Agents	There appears to be a conflict between the policies seeking to protect and assess impacts on existing retail and those for new/ expanded provision.	8. Retail and Town Centres					
Email	E.184	File K	Hoo Consortium	SDLP 1198	Stantec (Alex Jones)	Developers or Agents	Existing 'Local/ Rural Centres' are listed in draft Policy DM12. For ease of navigating the Local Plan, there would be merit in cross referring to this at Point 1c. Policy T18 states fall outside of the hierarchy (Point 2)? It would be helpful to include the distinction between a Local/ Rural Centre and Shopping Parade/ Neighbourhood Centre early in the supporting text to this Chapter. There would be merit in Point 3 cross-referring to the impact assessment thresholds in draft Policy T17.	8. Retail and Town Centres	8.3 Hierarchy of centres	Policy S16: Hierarchy of centres			
Email	E.184	File K	Hoo Consortium	SDLP 1199	Stantec (Alex Jones)	Developers or Agents	The strategic developments ought to be exempt from the provisions of draft Policy T17. Net sales floorspace would be an appropriate measure to include in an update to draft Policy T17 The Retail & Town Centres Study (2025) does not include Hoo in its consideration of impact assessment thresholds thus further evidencing that new retail provision on the Hoo Peninsula is not a main centre.	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment			
Email	E.184	File K	Hoo Consortium	SDLP 1200	Stantec (Alex Jones)	Developers or Agents	Clarity is needed as to what is meant by a 'main centre' for the Hoo Peninsula and where this sits in the town centre hierarchy as this is not a term/ name that features in the hierarchy at Point 1 of draft Policy S16. Draft Policy DM12: Local and Rural Centres includes new provision at Hoo, Chattenden and High Halstow within its remit but draft Policy S22 describes the other two retail centres on the Hoo Peninsula as 'neighbourhood centres'. Hoo, Chattenden and High Halstow new centres are also included in draft Policy T18: Shopping Parades and Neighbourhood Centres. Clarity is needed on which types of centres these are to be so that it is clear which policy they need to be considered against. Shopping Parades/ Neighbourhood Centres are noted in draft Policy T18 as having a 'very localised' role/ function and not competing with defined centres in the hierarchy. These ought not then require impact assessments pursuant to draft Policy T17.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Email	E.184	File K	Hoo Consortium	SDLP 1201	Stantec (Alex Jones)	Developers or Agents	Vehicle trip credit approach of draft Policy DM15 welcome but vehicle trip budget not yet defined; further work required on the detail and to incorporate this into an Area-Wide Travel Plan that establishes a practical methodology for its implementation/ management moving forward. Query why small/ medium-scale allocations and those in urban centres are not included in vehicle trip credit when they will create trips/ impacts that will need to be mitigated.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			

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Email	E.184	File K	Hoo Consortium	SDLP 1202	Stantec (Alex Jones)	Developers or Agents	Even with the vision-led approach the Council's Strategic Transport Assessment identifies some existing and forecast highway capacity constraints to be addressed. The Council has identified proposed mitigation schemes, some exceptionally large; these ought to be supported by optioneering and deliverability strategies that include funding at least part through alternative means to s106 as new developments can only be asked to contribute to the mitigation of 'new' impacts (i.e. not the known existing capacity issues). The Bus Rapid Transit is not currently included in the package of highway improvements or costed in the IDP; this is a priority item to facilitate the 'vision' that the Hoo Consortium would welcome further detail on. Initial discussions between Pell Frischmann and the local bus operator indicate no substantive constraints to expansion as	9. Transport	9.2 Monitoring and managing development				
Email	E.184	File K	Hoo Consortium	SDLP 1203	Stantec (Alex Jones)	Developers or Agents	Further work on 'cost apportionment' required that takes account of viability; this is understood to form part of a 'stage 2' that the Hoo Consortium would welcome engagement on	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.184	File K	Hoo Consortium	SDLP 1204	Stantec (Alex Jones)	Developers or Agents	It is noted that the Lower Thames Crossing upgrades will remediate some but not all of the existing issues at Junction 1 of the M2; the Hoo Consortium would welcome confirmation as to the current position in respect of M2 J1.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.184	File K	Hoo Consortium	SDLP 1205	Stantec (Alex Jones)	Developers or Agents	See Draft Area-Wide Travel Plan and Sustainable Transport Strategy	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.184	File K	Hoo Consortium	SDLP 1206	Stantec (Alex Jones)	Developers or Agents	Policy states that 'large scale residential developments will be required to provide community facilities to meet the needs of new residents' (3rd paragraph) with all developments over 10 homes contributing to upgrading community facilities (5th paragraph). To avoid doubling up on requirements, it should be confirmed that this will either be provision of new community facilities OR contributions to upgrading existing, but not both	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities			
Email	E.184	File K	Hoo Consortium	SDLP 1207	Stantec (Alex Jones)	Developers or Agents	The IDP includes several community/ cultural items for the Hoo Peninsula including an 'Integrated Community Hub' and 'Hoo Visitor Centre'. Neither of these currently have costs estimates. The Hoo Consortium welcomes the provision of additional community infrastructure for the Peninsula and will comment further on this once further information and costings are available	1. Overview	1.3 How the plan has been prepared	Evidence base: Infrastructure Delivery Plan			
Email	E.184	File K	Hoo Consortium	SDLP 1208	Stantec (Alex Jones)	Developers or Agents	Policy appears premature. Once further work has been undertaken, and published for review, the Hoo Consortium will provide further comment.	13. Energy	13.3 Heat networks	Policy T41: Heat networks			
Email	E.184	File K	Hoo Consortium	SDLP 1209	Stantec (Alex Jones)	Developers or Agents	To achieve a sound policy basis for bringing forward development at Hoo St Werburgh/ Chattenden, the Hoo Consortium considers that modifications are required to Policies SA8: Hoo St Werburgh and Chattenden	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.184	File K	Hoo Consortium	SDLP 1210	Stantec (Alex Jones)	Developers or Agents	To achieve a sound policy basis for bringing forward development at High Halstow, the Hoo Consortium considers that modifications are required to Policy SA9: High Halstow	14. Site Allocations	14.10 High Halstow				
Email	E.184	File K	Hoo Consortium	SDLP 1211	Stantec (Alex Jones)	Developers or Agents	The Commissioners' housing trajectory provides for completion of c. 1,880 homes within the current Plan period to 2041 whereas draft Policy SA8 assumes only 1,700 homes from this site. This would increase the total number of homes provided for through Policy SA8 from c. 4,700 to c. 4,900 requiring updates to Criteria 1 and the Site-Specific Information schedule for Sites HHH22 and HHH31. All c. 1,880 homes from Sites HHH22 and HHH31 will come forward in Years 1-15 of the Local Plan. It is currently stated that delivery will extend to 15 years plus. The delivery of homes at Hoo St Werburgh will extend beyond the current Plan period, Sites HHH22 and HHH31 are anticipated to deliver around 180 homes a year beyond 2041.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.184	File K	Hoo Consortium	SDLP 1212	Stantec (Alex Jones)	Developers or Agents	Criteria 3: Maintaining Separation – the emerging Local Plan seeks to avoid coalescence of Hoo St Werburgh and Chattenden to maintain these as two distinct settlements. The Hoo Consortium supports the intent but considers draft Policy SA8 to currently be too prescriptive as to the means by which separation will be maintained. Moreover, the specific approach advocated is not deliverable owing to existing highway infrastructure	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Amend avoid coalescence stimulation - policy too prescriptive .		
Email	E.184	File K	Hoo Consortium	SDLP 1213	Stantec (Alex Jones)	Developers or Agents	Criteria 3 provides for a 'strategic landscape corridor' between the settlements with the Figure 14 Concept Masterplan providing a green arrow in this location identified on the key as a 'strategic green corridor'. Delivery of a continuous green/ landscaped corridor as currently shown is not possible given the presence of the A228.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Strategic Landscape Corridor - reconsideration.		

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Email	E.184	File K	Hoo Consortium	SDLP 1214	Stantec (Alex Jones)	Developers or Agents	Criteria 5 and 11, Subsequent Design Principles and Concept Masterplan – several planning applications have been submitted in respect of draft site allocations at Hoo St Werburgh. These are underpinned by technical assessment that provide for optimal solutions and demonstrate deliverability. Further initial works have been undertaken by those sites not yet at the application stage. In addition to the updates noted above in respect of maintaining separation between Hoo St Werburgh and Chattenden, the Figure 14 Concept Masterplan requires modification to reflect the technically robust and deliverable development proposals submitted. Updated Composite Masterplan has been prepared by the Hoo Consortium.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Modification required to concept masterplan figure 14.		
Email	E.184	File K	Hoo Consortium	SDLP 1215	Stantec (Alex Jones)	Developers or Agents	In relation to Criteria 18, a 'strategic masterplan development framework' is not required in respect of ~~historic landscapes or other heritage considerations.~~	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Amendment to reference to requirement for 'strategic masterplan development framework'.		
Email	E.184	File K	Hoo Consortium	SDLP 1216	Stantec (Alex Jones)	Developers or Agents	Criteria 6, 12, 14 and 15: Hoo IDP and Highway/ Transport Schemes – these criteria refer to an Infrastructure Delivery Plan for the Hoo Peninsula. Both Criteria 6 and 12 include different names for this document. A single, consistent name would be helpful. Criteria 12 then goes on to refer to the 'latest IDP'. Clarity is needed on the intention in this regard. If a Hoo-specific IDP is to be prepared, this will need to be clearly distinct from the wider Medway IDP to avoid ~~confusion.~~	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Greater clarity required in relation to IDP (Hoo Peninsula) name, purpose etc. Separate to or part of main IDP?		
Email	E.184	File K	Hoo Consortium	SDLP 1217	Stantec (Alex Jones)	Developers or Agents	Criteria 14 on the Bus Rapid Transit is welcome given the importance to the place-based vision for the Hoo Peninsula. It is recommended that this Criteria be modified to refer to the type of service provision (i.e. BRT) rather than a specific bus operator and that BRT is used consistently throughout all subsequent relevant site allocation policies.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Amend policy to refer to type of service provision of BRT.		
Email	E.184	File K	Hoo Consortium	SDLP 1218	Stantec (Alex Jones)	Developers or Agents	Criteria 20: Heat Networks – as set out in the Hoo Consortium's comments on draft Policy T41, no supporting evidence has been published on the feasibility and/ or viability of delivering a heat network on the Hoo Peninsula so it is not currently possible to comment on the technical basis/ evidence underpinning draft Policy T41. Criteria 20 seeks to place the burden of exploring the feasibility/ viability of a heat network on the Hoo Peninsula on developers. This is not reasonable or justified given the absence of evidence. Moreover, draft Policy T41 sets out a hierarchy for developers to consider thus further duplication of requirements is not required in the site allocation Policy to ensure it aligns with the NPPF (paragraph 16(f)).	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Amend Criteria 20 to avoid duplication with policy T41. Remove requirement for developers to explore the feasibility/viability of heat network.		
Email	E.184	File K	Hoo Consortium	SDLP 1219	Stantec (Alex Jones)	Developers or Agents	Supporting Paragraph 14.10.2 and Criteria 6: Neighbourhood Plan and Local Housing Needs – reference is made in supporting paragraph 14.10.2 to the vision and aims of the High Halstow Neighbourhood Plan and a survey of housing needs. The emerging High Halstow Neighbourhood Plan was withdrawn from examination in 2022 and carries no weight in decision-making. It also does not appear that the housing needs survey is publicly available on either Medway or the Parish Council's websites. It is therefore not appropriate for the emerging Local Plan to include such specific details of a neighbourhood plan that does not exist and evidence base	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Remove refers to High Halstow Neighbourhood Plan and linked evidence base.		
Email	E.184	File K	Hoo Consortium	SDLP 1220	Stantec (Alex Jones)	Developers or Agents	Criteria 2 and Subsequent Design Principles: Combined Masterplan – the Hoo Consortium supports the intent of Criteria 2 for development proposals at high Halstow to come forward in a comprehensive manner but to achieve this does not require a single or combined masterplan. There are only two controlling parties who are part of the Hoo Consortium and so working collaboratively already. [~~See supplied Updated Composite Masterplan.~~	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Remove reference to combined Masterplan.		
Email	E.184	File K	Hoo Consortium	SDLP 1221	Stantec (Alex Jones)	Developers or Agents	Criteria 3: Village Centre – through master planning of the site allocations, connectivity to the existing Village Centre can be provided. It does not follow that viability of the existing centre will be improved as this depends on a range of factors outside of the control of the High Halstow developers thus this ought not be a requirement in the site allocation Policy.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Amend reference to 'viability'. of village centre.		
Email	E.184	File K	Hoo Consortium	SDLP 1222	Stantec (Alex Jones)	Developers or Agents	Criteria 4: Landscape/ Separation –seeks to prescribe the means by which coalescence is to be mitigated. High Halstow is a significant distance from any neighbouring settlements and thus the risk of coalescence is non-existent. Flexibility is required to allow the optimum ~~landscape enhancement strategies to be brought forward~~	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Querying reference to coalescence - flexibility required.		

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Email	E.184	File K	Hoo Consortium	SDLP 1223	Stantec (Alex Jones)	Developers or Agents	Criteria 11 and 12: Highway/ Transport Schemes –Criteria 11 should be amended to refer to the type of service rather than the service operator. Criteria 12 should be modified to make clear that developments will only be required to make proportionate contributions to the junction works listed and only then if impacts beyond the existing capacity constraints are identified to ensure CIL Regulation compliance.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Amend policy to refer to type of service (not service operator). Amend CIL contributions requirements to ensure regulation compliance.		
Email	E.184	File K	Hoo Consortium	SDLP 1224	Stantec (Alex Jones)	Developers or Agents	Policy should be modified to have the same expectation to facilitate/ support Bus Rapid Transit and funding of sustainable travel measures prioritised over general ~~highway infrastructure~~ .	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements			
Email	E.184	File K	Hoo Consortium	SDLP 1225	Stantec (Alex Jones)	Developers or Agents	Policy should be modified to have the same expectation to facilitate/ support Bus Rapid Transit and funding of sustainable travel measures prioritised over general ~~highway infrastructure~~ .	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Email	E.184	File K	Hoo Consortium	SDLP 1226	Stantec (Alex Jones)	Developers or Agents	Policy style – too long, needs numbering of points/subpoints. Creates ambiguity. Explanatory text and policy justification ought to be relocated to the supporting/ explanatory paragraphs. The Policies would also benefit from being broken in to clearly identified points/ sub-points that make clear the different elements/ expectations of the ~~Policies~~ .	1. Overview	1.3 How the plan has been prepared		Policy wording, style, layout etc amendment/refinement for clarity.		
Email	E.184	File K	Hoo Consortium	SDLP 1227	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - The Consortium would welcome BRT infrastructure coming forward at the earliest opportunity, noting that the infrastructure can come ahead of the future services, and that surety of routing and provision provides the certainty about which masterplans can be prepared and which new development can rely on from 'Day 1' to ensure that sustainable travel patterns are locked in from the outset ~~of occupation~~ .	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre			
Email	E.184	File K	Hoo Consortium	SDLP 1228	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - It is noted the BRT cross some proposed land allocations of the Consortium members. The Consortium would welcome further engagement with Medway on the proposed routing, with a view to ensuring that the potential routing(s) are properly captured at the ~~earliest stage of the site master planning process~~ .	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre			
Email	E.184	File K	Hoo Consortium	SDLP 1229	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - The Consortium welcomes a policy basis for managing vehicle trip credits but would query why the minimum cutoff of 50 homes / 5,000sqm floorspace is to be applied. Though not a large proportion of overall development, small developments are also contributors to the need to improve infrastructure provision on the Peninsula and so the Consortium would expect that they should fall under the same requirement as 'windfall' sites, in that they would also be expected to make proportionate contributions towards the necessary transport mitigations.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			
Email	E.184	File K	Hoo Consortium	SDLP 1230	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - The monitor and managing of the trip credits should be controlled by Medway Council and that the Council should be responsible for managing any reallocation credits as required through the monitoring ~~process~~ .	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			
Email	E.184	File K	Hoo Consortium	SDLP 1231	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - Support for an Area-Wide Travel Plan. Informed by the Sustainable Transport Strategy, Consortium's Area-Wide Travel Plan is currently in preparation but draft is supplied. (LP Para 9.11.8)	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and ~~travel plans~~			
Email	E.184	File K	Hoo Consortium	SDLP 1232	Stantec (Alex Jones)	Developers or Agents	See suggested amendment	14. Site Allocations	14.9 Hoo St Werburgh and ~~Chattenden~~	Policy SA8: Hoo St Werburgh and ~~Chattenden~~	Pell Frischmann rep - Policy wording be adjusted from "fast-track bus services" to "bus rapid-transit services (or similar)"		
Email	E.184	File K	Hoo Consortium	SDLP 1233	Stantec (Alex Jones)	Developers or Agents	See suggested amendment	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Pell Frischmann rep - Policy wording be adjusted from "fast-track bus services" to "bus rapid-transit services (or similar)"		
Email	E.184	File K	Hoo Consortium	SDLP 1234	Stantec (Alex Jones)	Developers or Agents	Pell Frischmann rep - The Strategic Transport Assessment identifies some existing and forecast highway capacity constraints relating to the Peninsula which will need to be addressed.....but these are not supported by a clear optioneering process commensurate with scale.....deliverability of the schemes is unclear (particularly at Four Elms Roundabout) and this is a risk.....the LP does not propose improvements to M2 J1 or apportion costs to do so.	9. Transport	9.11 Transport assessments, transport statements and travel plans				
Email	E.184	File K	Hoo Consortium	SDLP1170	Stantec (Alex Jones)	Developers or Agents	It will be important to ensure that any Hoo-specific IDP is clearly distinguished from the Medway-wide IDP to ensure 'double counting' of infrastructure items/ costs does not occur. The Council may wish to consider whether a separate IDP for the Hoo Peninsula is necessary to streamline the number of supporting documents/ plans developers and officers will need to consider.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			

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Email	E.184	File K	Hoo Consortium	SDLP1171	Stantec (Alex Jones)	Developers or Agents	It is assumed that this will be 'live' in the context of the Regulation 19 consultation but will be 'fixed' in advance of the examination to provide certainty to developers? The inclusion of all cost estimates will assist developers in understanding the likely level of s106 contributions and the Hoo Consortium would welcome the further opportunity to comment on the IDP once updates are available/To provide developers with confidence to bring development forward, there would be merit in updating [IDP] estimates to provide more accurate/ refined costings/ The Hoo Consortium would encourage the Council to review its IDP cost estimates in this context and consider a benchmarking	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.184	File K	Hoo Consortium	SDLP1172	Stantec (Alex Jones)	Developers or Agents	Strategic policies on development needs and spatial strategy required.	3. Spatial Development Strategy	3.1 Overview				
Email	E.184	File K	Hoo Consortium	SDLP1173	Stantec (Alex Jones)	Developers or Agents	A comprehensive housing trajectory is required that includes commitments, site allocations and windfall.	3. Spatial Development Strategy	3.1 Overview				
Email	E.184	File K	Hoo Consortium	SDLP1174	Stantec (Alex Jones)	Developers or Agents	Clear and consistent format for policies required throughout that avoids explanatory text within the body of the policy, focuses on expectations/ requirements and includes numbering/ sub points for ease of referencing.	1. Overview	1.3 How the plan has been prepared		Refine/amend policy format - wording, numbering etc for greater clarity		
Email	E.184	File K	Hoo Consortium	SDLP1175	Stantec (Alex Jones)	Developers or Agents	Avoid conflicting requirements across policies and disproportionate information requirements for applications. For example, requiring new local/ neighbourhood centres on the Hoo Peninsula in line with S22 and SA8 to support self-containment and reduce vehicle trips but only if it is demonstrated that no impacts will arise pursuant to T17 (which itself requires refinement to clarify that the floor area thresholds relate to net sales floor space)	8. Retail and Town Centres	8.2 Town centres strategy				
Email	E.184	File K	Hoo Consortium	SDLP1176	Stantec (Alex Jones)	Developers or Agents	Avoiding unnecessary additional layers of requirements that risk delaying delivery of development and add further burden to the information requirements.	1. Overview	1.3 How the plan has been prepared				
Email	E.184	File K	Hoo Consortium	SDLP1177	Stantec (Alex Jones)	Developers or Agents	Providing details, costings and funding mechanisms for the items in the IDP currently marked as 'TBC'; refinement of the current high-level costings for highway mitigation and inclusion of costs associated with the Bus Rapid Transit system to provide realistic estimate to improve developer confidence; further clarity needed on the phasing and coordination of infrastructure delivery.	1. Overview	1.3 How the plan has been prepared	Evidence base: Infrastructure Delivery Plan			
Email	E.184	File K	Hoo Consortium	SDLP1178	Stantec (Alex Jones)	Developers or Agents	Review of assumptions/ inputs and approach to ensure that this appropriately reflects costs so as to result in an accurate understanding of viability and assist in identifying 'gaps' in funding that cannot be met by developments without impacting the quantum of affordable homes that come forward.	1. Overview	1.3 How the plan has been prepared	Evidence base: Infrastructure Delivery Plan			
Email	E.184	File K	Hoo Consortium	SDLP1179	Stantec (Alex Jones)	Developers or Agents	Welcome the approach but query why small/ medium-scale allocations and those in urban centres are not included in vehicle trip credit when they will create trips/ impacts; further clarity needed on the mechanism for reallocation of trip credits.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			
Email	E.44	File R	Hoo Parish Council	SDLP 157	N/A	MPs, Members and Parish Councils	Concerns over loss of high grade agricultural land, harming the rural economy.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy		No	
Email	E.44	File R	Hoo Parish Council	SDLP 158	N/A	MPs, Members and Parish Councils	The Local Plan is not sound. The Plan has not been positively prepared, due to seeking to meet need in the most unsustainable way, with 31% of growth proposed for the rural area. The Plan is not justified due to the focus on rural development, rather than any of the more sustainable options. The Plan is not effective as it is undeliverable, in particular due to inadequate infrastructure. There are no firm proposals to address this deficiency. The Plan is not consistent with national policy due to it enabling undeliverable and unsustainable development, ignoring numerous policies in the Framework	3. Spatial Development Strategy	3.1 Overview				
Email	E.44	File R	Hoo Parish Council	SDLP 159	N/A	MPs, Members and Parish Councils	Medway Council have treated the Parish Council as just another consultee rather than as a statutory plan making body. Medway Council has ignored the recently made Hoo St Werburgh and Chattenden Neighbourhood Plan.	1. Overview	1.4 Duty to Cooperate				
Email	E.44	File R	Hoo Parish Council	SDLP 160	N/A	MPs, Members and Parish Councils	Concerned there are problems with the statutory process, in particular a failure to undertake consultations that comply with planning law and consultation common law. There have multiple problems with the process in terms of legal compliance, for the reasons set out in previous representations.	1. Overview	1.4 Duty to Cooperate			No	
Email	E.44	File R	Hoo Parish Council	SDLP 161	N/A	MPs, Members and Parish Councils	Medway Council have treated the Parish Council as just another consultee rather than as a statutory plan making body. Medway Council has ignored the recently made Hoo St Werburgh and Chattenden Neighbourhood Plan.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 162	N/A	MPs, Members and Parish Councils	There are contradictions between the strategic objectives and the proposal for Hoo. 4 examples given. The strategy for growth is incoherent against the context of the Local Plan's objectives.	2. Vision and Strategic Objectives	2.2 Strategic objectives				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.44	File R	Hoo Parish Council	SDLP 163	N/A	MPs, Members and Parish Councils	There are contradictions between the strategic objectives and the proposal for Hoo. 4 examples given. The strategy for growth is incoherent against the context of the Local Plan's objectives.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 164	N/A	MPs, Members and Parish Councils	Object to Policy SA8 and the site allocation. The objectives of the policy are contradictory. The level of growth proposed is disproportionate and inappropriate in a rural parish. Transport infrastructure is inadequate, and unclear how it will be addressed. This raises doubt over deliverability of proposals for Hoo. Note the proposal for development to provide for distinctive neighbourhoods, with strong connections to the existing and new settlements. However, Medway does not have a good track record in terms of distinctive housing design. There is no public support for a masterplan that involves the urbanisation of the rural parish. Also not made reference to the	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 165	N/A	MPs, Members and Parish Councils	The proposal to maintain the separation of Hoo and Chattenden as distinct settlements through a strategic landscape corridor is noted, but is not reflected by the Policies Map North West, which shows a joining up of Hoo and Chattenden. This ignores one of the key principles in the Neighbourhood Plan	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - North West		No	
Email	E.44	File R	Hoo Parish Council	SDLP 166	N/A	MPs, Members and Parish Councils	Regarding infrastructure It is not clear how this would be paid for and provided, raising fundamental questions over deliverability. Concern over A228 traffic and gridlock affecting domestic and commercial traffic and social and economic consequences. Little confidence that developers would fund and provide the levels of community and transport infrastructure required. Concern over ignorance of insufficient capital investment programmes of utility providers to keep up with development. The Parish Council would support proportionate development to provide employment and community facilities	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 167	N/A	MPs, Members and Parish Councils	Believes there to be a misrepresentation of proposals to develop in the countryside and urbanise a rural parish.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 168	N/A	MPs, Members and Parish Councils	Concern that there are references to national bodies' documents and the Hoo Planning Framework, but not to policies in the Neighbourhood Plan. Considers the Council does not want to work with the Parish Council, local stakeholders, community and businesses.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 169	N/A	MPs, Members and Parish Councils	Reference is made to the strategic employment sites at Kingsnorth (Policy SA14), but not to the harm that housing development would cause to the site's accessibility and traffic flows, due to limited highway capacity. Concern over loss of high grade agricultural land, which has serious negative implications for the rural economy, rural employment and food security.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email	E.44	File R	Hoo Parish Council	SDLP 170	N/A	MPs, Members and Parish Councils	the Impact matrix of spatial growth options shows that development of the Hoo peninsula at the scale envisaged is the most harmful and unsustainable option, including negative impacts on a number of areas. The blended option includes the Hoo Peninsula and is "incoherent". Concern over excessive urbanisation of a rural parish.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal	Suggest the Sustainability Analysis be undertaken again, but based on more growth options that are properly informed by national policy.	No	
Email	E.44	File R	Hoo Parish Council	SDLP 171	N/A	MPs, Members and Parish Councils	Infrastructure deficiencies and no solid proposals to provide infrastructure to accommodate the urbanisation of the Parish	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery		No	
Email	E.44	File R	Hoo Parish Council	SDLP 172	N/A	MPs, Members and Parish Councils	The Local Plan is not sound. The Plan has not been positively prepared, due to seeking to meet need in the most unsustainable way, with 31% of growth proposed for the rural area. The Plan is not justified due to the focus on rural development, rather than any of the more sustainable options. The Plan is not effective as it is undeliverable, in particular due to inadequate infrastructure. There are no firm proposals to address this deficiency. The Plan is not consistent with national policy due to it enabling undeliverable and unsustainable development, ignoring numerous policies in the Framework	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1398	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1399	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective.	1. Overview	1.1 Introduction				
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1400	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.1 Introduction				
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1401	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.1 Introduction				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1402	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1403	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1404	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Standard Responses)	H.10a-z	File N-P(b)	Hoo Peninsula Campaign Group	SDLP 1405	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hard copy	H.9	File N	Hospital Petition_56 Signatures	SDLP 1397	N/A	Members of the Public	Petition for a new hospital	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.156	File E	HRF Properties Limited	SDLP 889	DHA (John Collins)	Developers or Agents	Additional sites must be identified to ensure the Council's housing requirement is met in full. Site's such as "Land West of Lower Featherby Road, Gillingham" should be considered for inclusion in the Plan as housing allocations where they align with the Council's spatial strategy for growth.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5		Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14
Email	E.156	File E	HRF Properties Limited	SDLP 890	DHA (John Collins)	Developers or Agents	We consider the Council's published "Duty to Cooperate Statement, Proposed Submission Document, June 2015" is incomplete as it still intends to provide a final composite statement with no less than four Local Planning Authorities, and five statutory consultees, including National Highways. Discussions with Gravesham Borough Council are not concluded and their unmet need is unresolved so unclear if the total number of homes being planned for is sufficient and whether further land needs to be identified. Also only one SoCG is available with Kent County Council in respect of Strategic Waste Management and Minerals Supply Matters such that housing has not been addressed at all. Contended it is not "Consistent with National Policy" and it cannot be determined that it has been "Positively	1. Overview	1.4 Duty to Cooperate			Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14
Email	E.156	File E	HRF Properties Limited	SDLP 891	DHA (John Collins)	Developers or Agents	We have a strong concern that MC seeks to over-rely on the development of PDL. The reality is that commercial sites are now a premium and there is inadequate evidence to demonstrate that there is a realistic likelihood that such developments will always, or even regularly, be viable to be re-developed for residential purposes. This again raises significant doubt as to whether the plan can be effective in delivering the necessary housing number based on Policy SA4.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14
Email	E.156	File E	HRF Properties Limited	SDLP 892	DHA (John Collins)	Developers or Agents	A large number of units are sought on sites with very significant infrastructure costs which do not appear to have been fully costed. It is therefore, our view that this large area of land to the east of Gillingham, should be allocated for development in order to accommodate housing that MC can have confidence can be delivered within a short timeframe and thus assist in meeting the identified housing needs.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.156	File E	HRF Properties Limited	SDLP 893	DHA (John Collins)	Developers or Agents	With the scale of under delivery in the past 10 years or so, it is also considered essential that a greater buffer is provided. This requires the identification of further sites. In this respect we have a significant concern that some sites may have been double counted within the current draft. Further evidence from MC is required in this respect.	1. Overview	1.3 How the plan has been prepared			Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14
Email	E.136	File E	Hutchison Ports	SDLP 751	Fortis Planning (Kate Holland)	Developers or Agents	It is welcomed that Policy S11: Existing Employment Provision has been updated to include clarifications on the types of employment uses that would be acceptable at existing employment sites. However, Policy S11 does not specifically allow for renewable and low carbon energy development within existing employment areas. Policy S11 should be clear that this type of development would be acceptable at London Thamesport to avoid conflict between Policy S11 and Policy S25 of the Local Plan.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision		Yes	To represent our Client who's site is allocated as an existing employment site in the Local Plan.
Email	E.136	File E	Hutchison Ports	SDLP 752	Fortis Planning (Kate Holland)	Developers or Agents	This policy supports development of renewable and low carbon energy development on the Isle of Grain, however without clarification there would be conflict between Policy S11 and Policy S25 of the Local Plan.	13. Energy	13.2 Energy supply	Policy S25: Energy Supply		Yes	To represent our Client who's site is allocated as an existing employment site in the Local Plan.
Email	E.136	File E	Hutchison Ports	SDLP 753	Fortis Planning (Kate Holland)	Developers or Agents	Supportive of this policy which seeks to safeguard existing riverside infrastructure as this is reflective of the long term aspirations and growth potential of London Thamesport. The role of London Thamesport and the potential to redevelop land within the port should therefore be reflected in a specific site allocation for London Thamesport.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure		Yes	To represent our Client who's site accommodates riverside infrastructure as identified within the Policy T21.
Email	E.136	File E	Hutchison Ports	SDLP 754	Fortis Planning (Kate Holland)	Developers or Agents	Supportive of this policy, it is not considered that plans for continued growth and expansion of London Thamesport would undermine the use of the mineral supply infrastructure at London Thamesport.	11. Minerals Supply	11.3 Safeguarding of existing mineral supply infrastructure	Policy T31: Safeguarding of existing mineral supply infrastructure		Yes	To represent our Client who's site is safeguarded for mineral supply infrastructure within the Policy T31
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1406	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1407	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1408	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1409	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1410	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1411	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1412	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.11	File Q	J Holyoak	SDLP 1413	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.151	File M	J P Eastlake	SDLP 864	N/A	Members of the Public	Objection to the Strood North Development with concerns about traffic issues, lack of consultation, unsuitable infrastructure, and disruption to residents. emphasizes preserving green belt and agricultural land, urging protection of historic and rural areas from urban sprawl	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1739	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1740	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1741	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1742	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1743	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1744	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1745	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.46	File Q	J Prenezek	SDLP 1746	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.28	File L	Jacqueline Mark	SDLP 88	N/A	Members of the Public	DTC - Insufficient evidence of engagement on strategic cross-boundary issues. Reg 18 and 19 consultation procedurally defective. Numerous policies non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan. Non conformity with Hoo St Werburgh & Chattenden NP. Local Plan conflicts with Neighbourhood Plan policies on infrastructure, landscape, community facilities and housing. SA fails to legally satisfy SEA Directive, HRA is flawed in its methodology. Infrastructure Delivery and monitoring evidence are legally inadequate. Querying allocations on Hoo Peninsula, insufficient infrastructure proposed, poor roads, concern over air pollution/quality and impact on health, impact on	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.100	File L	James Brewood	SDLP 344	N/A	Members of the Public	Rochester Airport's development plan is flawed, with concern over environmental harm, economic redundancy, and public safety risks. Located near schools and homes, it lacks proper risk assessments and transparency. Noise pollution remains unresolved, and carbon reduction goals are ignored	9. Transport	9.7 Aviation				
Email	E.135	File L	James O'Brien	SDLP 748	N/A	Members of the Public	Proposed developments near the Gravesham boundary will impact Medway's infrastructure (roads, schools, healthcare), which is already overstretched	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.135	File L	James O'Brien	SDLP 749	N/A	Members of the Public	Criticises the vague definition of "grey belt" and its reliance on the concept of "previously developed land." Highlights that parcels 2–6 in "Land west of Strood" are Grade 1 agricultural land and therefore not previously developed.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.135	File L	James O'Brien	SDLP 750	N/A	Members of the Public	Warns that development will: - Erase valuable agricultural land - Increase in air pollution - Increase pressure on water and waste services Urges closing the strategic green gap between Strood, Higham, Chalk and Gravesend	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email & OPUS	E.8	File L	Jennifer Price	SDLP 15	N/A	Members of the Public	• Opposes changes to Greenbelt designation and proposed development west of Strood. • Concern over planning before Gravesham finalised its own plan, despite cross border implications. • Oversimplistic greenbelt review that doesn't account for environmental, social and infrastructure impacts and conflicts with national policy. • Missing joint masterplan with Gravesham. • Concern over policy contradictions and urges for rejection	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.102	File L	Jessica Glover	SDLP 351	N/A	Members of the Public	Agree with need for housing but concerned about development of Green Belt land relating to Strood West because of environmental degradation, and threats to wildlife	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.102	File L	Jessica Glover	SDLP 352	N/A	Members of the Public	Infrastructure is inadequate, with overstretched schools and hospitals. Health risks from a nearby fuel pipeline persist. Concern about sustainability in Strood West's development.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.16	File L	Jill Lovell	SDLP 42	N/A	Members of the Public	Concern over loss of agricultural land, and food security. Suggests safeguarding land at Capstone for a place like Thanet Earth providing employment	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	
Email	E.16	File L	Jill Lovell	SDLP 43	N/A	Members of the Public	Stresses importance of infrastructure in general.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hard copy	H.1	File N	Jill Rees	SDLP 1357	N/A	Members of the Public	• Acknowledgement of housing need for local families, with infrastructure first (including healthcare facilities). However, there is concern about bus routes and access of transport for existing residents, specifically Rainham. • Need for a diversified offer in Rainham centre	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email	E.27	File L	Joann Skinner	SDLP 87	N/A	Members of the Public	Concern raised over impact of development West Strood and others on wildlife, traffic, loss of greenbelt, demand for water, health facilities, risk of flooding and pollution. Insufficient infrastructure	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.38	File L	Joe Fallarino	SDLP 119	N/A	Members of the Public	Environmental and wildlife concerns from increased homebuilding. Queries reclassification of greenbelt land.	4. Natural Environment					
Email	E.38	File L	Joe Fallarino	SDLP 120	N/A	Members of the Public	Historic promises (noise reduction, improved safety) have gone unfulfilled, and neither the consultant critique nor any cross-council agreements have been published, undermining transparency and legal compliance	1. Overview	1.3 How the plan has been prepared				
Email	E.38	File L	Joe Fallarino	SDLP 121	N/A	Members of the Public	Concern about policy conflicts and financial unknowns. Lack of evidence in justifying proposals. T23 should be struck from the Local Plan and the airfield land reconsidered for higher-value, community-focused development	9. Transport	9.7 Aviation	PolicyT23: Aviation	T23 should be struck from the Local Plan and the airfield land reconsidered for higher-value, community-focused development.		
Email	E.38	File L	Joe Fallarino	SDLP 122	N/A	Members of the Public	Infrastructure capacity concerns from increased home building.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.38	File L	Joe Fallarino	SDLP 123	N/A	Members of the Public	Advocates for hospital building	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.188	File M	John Connelly	SDLP 1240	N/A	Members of the Public	Higham Surgery closure highlights lack of healthcare services	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.188	File M	John Connelly	SDLP 1241	N/A	Members of the Public	Residents fear worsening infrastructure, reduced safety, and urban sprawl, urging councillors to reconsider plans that threaten community wellbeing and Medway's distinct identity	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.188	File M	John Connelly	SDLP 1242	N/A	Members of the Public	Residents fear worsening infrastructure, reduced safety, and urban sprawl, urging councillors to reconsider plans that threaten community wellbeing and Medway's distinct identity	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.188	File M	John Connelly	SDLP 1243	N/A	Members of the Public	Concerns over Rede Court Housing include unsafe road access, parking issues	14. Site Allocations	14.7 Strood West				
Email	E.188	File M	John Connelly	SDLP 1244	N/A	Members of the Public	Aviation fuel pipe risks	9. Transport	9.7 Aviation				
Email	E.188	File M	John Connelly	SDLP 1245	N/A	Members of the Public	Concern over loss Green Belt land.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1678	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1679	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1680	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1681	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1682	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1683	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1684	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1685	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.39	File Q	John Drake	SDLP 1686	N/A	Members of the Public	Concern about infrastructure funding following HIF bid withdrawal.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.98	File L	John Leigh and Shirley Leigh	SDLP 336	N/A	Members of the Public	Concerns over legal compliance and vague cross-boundary cooperation.	1. Overview	1.4 Duty to Cooperate				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.98	File L	John Leigh and Shirley Leigh	SDLP 337	N/A	Members of the Public	Concern over release of Green Belt land and undermining sustainable development and environmental protection.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.98	File L	John Leigh and Shirley Leigh	SDLP 338	N/A	Members of the Public	Objects to policy SA6 Concern over reclassification of Green Belt land, because of concern for environmental degradation, and worsening air quality.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1489	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1490	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1491	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1492	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1493	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1494	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1495	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1496	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.21	File Q	John Rigby	SDLP 1497	N/A	Members of the Public	No details around traffic and road improvements	9. Transport					
Email	E.101	File L	Judith Masey	SDLP 345	N/A	Members of the Public	Object to Reclassifying Grade 1–2 farmland as “Grey Belt” undermines Green Belt protections, risking urban sprawl.	4. Natural Environment	4.12 Green Belt				
Email	E.101	File L	Judith Masey	SDLP 346	N/A	Members of the Public	The plan lacks balance between housing and employment	7. Economic Development					
Email	E.101	File L	Judith Masey	SDLP 347	N/A	Members of the Public	Fails to uphold national policies on health and amenities	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.101	File L	Judith Masey	SDLP 348	N/A	Members of the Public	Concern over threat to air and water quality and impact on road congestion.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email	E.101	File L	Judith Masey	SDLP 349	N/A	Members of the Public	Concern over threat to air and water quality	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			
Email	E.101	File L	Judith Masey	SDLP 350	N/A	Members of the Public	Concern over impact on road congestion.	9. Transport					
Email	E.15	File L	Julian Gray land	SDLP 41	N/A	Members of the Public	Disagrees with Grey Belt Designation, loss of agricultural land and environmental impact. There is no infrastructure in place for the number of dwellings proposed. Concern raised over amount of water and additional power needed, traffic congestion, pollution and primary healthcare facilities. Suggests purchasing vacant properties via auction or compulsory purchase and refurbishing	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West (Sites SNF1, SNF3, SR5)		No	
Email	E.163	File M	Justine Percy	SDLP 957	N/A	Members of the Public	Concerns over inadequate infrastructure	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.163	File M	Justine Percy	SDLP 958	N/A	Members of the Public	Housing located far aware doesn't benefit locals residents as infrastructure isn't in place and existing services are already overstretched	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.163	File M	Justine Percy	SDLP 959	N/A	Members of the Public	Concerns over Green Belt erosion	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.163	File M	Justine Percy	SDLP 960	N/A	Members of the Public	The plan lacks robust traffic modelling, overlooks the impact of the Lower Thames Crossing, and assumes unrealistic public transport uptake	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1695	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1696	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					

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Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1697	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1698	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1699	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1700	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1701	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1702	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.41	File Q	Kaitlan Murphy	SDLP 1703	N/A	Members of the Public	Concern about younger generations access to healthcare facilities and additional strain that will come with new development	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.72	File L	Karla Mugford	SDLP 287	N/A	Members of the Public	Consider implementing an Article 4 Direction in Medway, which would require any conversion of a residential dwelling into a House in Multiple Occupation (HMO) to be subject to the full planning permission process and formal approval.	6. Housing	6.8 Houses of multiple occupation			No	
Email	E.33	File L	Katherine Baird	SDLP 97	N/A	Members of the Public	It breaches principles of transparency, impartiality, and public accountability by hiding key studies and criteria. It appears to prioritise developer gains over residents' wellbeing and sustainable community outcomes.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.33	File L	Katherine Baird	SDLP 98	N/A	Members of the Public	Concern over development and consequent increasing traffic congestion, for which the local plan does not provide sufficient evidence of traffic impact analysis or modelling, and does not address impact of proposed housing development in Gravesham nor the Lower Thames Crossing	9. Transport	9.2 Monitoring and managing development			No	
Email	E.33	File L	Katherine Baird	SDLP 99	N/A	Members of the Public	The Plan ignores critical impacts on transport, healthcare, environment, and funding for infrastructure, making it unsound and premature.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Email	E.9	File L	Keith Bell	SDLP 16	N/A	Members of the Public	Objection to build on current greenbelt land adjacent to the top of Carisbrooke Road, referred to as 'plot' SNF1. Aware of the need for extra housing across Medway but I would have thought building on brownfield or ex-MOD land would have been more of a priority rather than using existing productive 'greenbelt' arable farming land, that has been in the same farming family for over the last 50 years.	3. Spatial Development Strategy					
Email	E.9	File L	Keith Bell	SDLP 17	N/A	Members of the Public	Seen the previously drawn up plans from 2023, which takes into account the various pipelines that run through this area for water, gas & the aviation gas pipeline. Have concerns as living adjacent to this field with the active aviation gas pipeline also running through our back garden that a breach of this pipeline could occur during construction, which could have devastating 'explosive' effects.	13. Energy	13.2 Energy supply				
Email	E.9	File L	Keith Bell	SDLP 18	N/A	Members of the Public	Concern over recent water supply issues across Kent and requests responses from water authorities to Medway Council regarding their capacity to support upcoming developments, especially within the next 12–24 months.	5. Built Environment	5.4 Sustainable design and construction				
Email	E.9	File L	Keith Bell	SDLP 19	N/A	Members of the Public	Having reviewed the definitions of changes from greenbelt to grey belt land, how have Medway Council applied this process in this case, as this arable farming land does not appear to fit any of the Grey belt descriptions, within this definition?	3. Spatial Development Strategy	3.1 Overview				
Email	E.9	File L	Keith Bell	SDLP 20	N/A	Members of the Public	Regarding 'Grey belt' change, where was the public announcement/ consultation process for the Medway local plan discussed at Council meeting 26th June? While this review was carried out by apparently independent consultants, why was this report not available for review & who was the consultant company involved?	3. Spatial Development Strategy	3.1 Overview				
Email	E.9	File L	Keith Bell	SDLP 21	N/A	Members of the Public	Regarding the 'link' with Gravesham BC, their local plan has yet to be published, surely Medway Council 'grey belt' plans should not have been agreed until GBC's had been agreed, hence premature agreements by Medway not based on 'fact' from Gravesham side -why?	1. Overview	1.4 Duty to Cooperate				

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Email	E.9	File L	Keith Bell	SDLP 22	N/A	Members of the Public	With this increase to the local population, where is the increase to local facilities such as, GP/ Dentist & especially extra capacity for Medway Hospital ?	10. Health, communities and Infrastructure					
Email	E.9	File L	Keith Bell	SDLP 23	N/A	Members of the Public	A development master plan was developed between land owners & larger house builders, who naturally would be pushing for Greenbelt development as it is cheaper for them than having to build on brownfield sites - why has sight of this 'document/ report' not been provided?	3. Spatial Development Strategy	3.1 Overview				
Email	E.9	File L	Keith Bell	SDLP 24	N/A	Members of the Public	Believe a recent developers only meeting was held by Medway Council with no public attendance allowed & this along with all above activities have taken place before any pubic consultation meetings have been arranged, giving local residents a feeling that this is already a done deal - hence what if any assurances will the council provide to listen & act upon any future concerns/ objections raised within future planned public meetings?	1. Overview	1.3 How the plan has been prepared				
Email	E.90	File L	Keith Best & Lesley Best	SDLP 317	N/A	Members of the Public	Concern over Rede Court Road development which threatens valuable farmland, increases traffic on unsuitable residential roads, and strains already overburdened infrastructure, healthcare, and schools. It undermines Green Belt protections, harms wildlife habitats, and lacks transparency. Urges prioritizing brownfield sites and sustainable planning over irreversible environmental and community damage.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.53	File L	Kelvin Carr	SDLP 219	N/A	Members of the Public	Concerned proposed site allocations SNF1, SNF2, SNF3, SNF4 would increase strain on infrastructure, remove green spaces and increase traffic congestion. Has concerns regarding Highways and congestion, strategic transport links, particularly Lower Thames Crossing, Blue Bell Hill and M2 and A2	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.53	File L	Kelvin Carr	SDLP 220	N/A	Members of the Public	No site-specific assessments of the impact that SNF1–SNF4 allocations will have on air quality, noise, or environmental health. Also no mention of pollution mitigation. Omission of site-specific air and noise pollution evidence for SNF1–SNF4 renders this section of the Plan fundamentally incomplete. Also loss of tranquillity is contrary to NPPF paragraph 185, without assessment or mitigation it is a failure of soundness and planning judgement to proceed nationally.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.53	File L	Kelvin Carr	SDLP 221	N/A	Members of the Public	Concern the plan does not provide a formal Green Belt Review as supporting evidence and therefore the allocations are not justified or sound , Identify whether the land was ever formally designated as Green Belt under national policy or explain when, how, or under what authority its status changed from protected land to land now considered developable. Grey Belt is not referenced in the NPPF or planning guidance, and if not Green Belt the land is open agricultural land its loss requires environmental and community impact assessment which is not provided.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt		No	
Email	E.53	File L	Kelvin Carr	SDLP 222	N/A	Members of the Public	Loss of informal access and open space - the existing informal access routes across the fields of sites SNF1 –4 are not mapped or acknowledged, does not propose safeguarded or enhanced walking routes as part of the site allocation or assess the amenity impact of severing access for residents. Suggests audit of existing informal use and amenity value, A strategy to protect or replace local access to open space. And a justification for why this land, so actively used by the community, should be taken out of public reach without compensation or mitigation.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces		No	
Email	E.53	File L	Kelvin Carr	SDLP 223	N/A	Members of the Public	Concern over Infrastructure capacity: GPs, dentists, schools. Public transport, and demand for water, energy, waste services and broadband. No site-specific infrastructure analysis or delivery plan. Policy SA5 offers no assurance on funding, phasing or expansion of infrastructure. The IDP contains no evidence that statutory providers (e.g. NHS Kent & Medway, Southeast Water, UK Power Networks) have confirmed deliverability of services in line with this growth, undermining the soundness and deliverability of these allocations. Requests a Strood-	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town Centre and Surrounds		No	
Email	E.53	File L	Kelvin Carr	SDLP 224	N/A	Members of the Public	Sites SNF1 - SNF4 are important for biodiversity and development would result in wildlife displacement. Concerned there are no ecological assessments for these sites, consequently not legally compliant or sound and the Sustainability Appraisal does not have site specific evaluation of impact in Strood North. It is not demonstrated how environmental harm will be avoided or mitigated.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.53	File L	Kelvin Carr	SDLP 225	N/A	Members of the Public	Duty to cooperate with Gravesham - concern over cross border implications of development and does not believe Medway have demonstrated effective engagement with Gravesham, requests publication evidencing engagement with Gravesham to ensure plan is legally compliant and sound.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.1		No	

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Email	E.53	File L	Kelvin Carr	SDLP 226	N/A	Members of the Public	Concern over perceived imbalance of influence with Plan favouring developers' priorities over the local community. Believe residents' previous comments largely unaddressed.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.3		No	
Email	E.53	File L	Kelvin Carr	SDLP 227	N/A	Members of the Public	Concern over prioritisation of brownfield sites, believe parcels SNF1 to SNF4 (undeveloped greenfield land) has been prioritised over available brownfield alternatives. Evidence base should include brownfield capacity assessment, site selection comparison that weighs brownfield vs greenfield sustainability and demonstration that these SNF sites represent the least environmentally harmful, most infrastructure ready options. Approach taken is not consistent with NPPF (para 119, not justified and plan is not sound).	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.53	File L	Kelvin Carr	SDLP 228	N/A	Members of the Public	Concern over safeguarding of existing pipelines and utilities, believe this has not been done and creates serious risk. Absence of any reference to physical service infrastructure in Strood North calls this deliverability into question. Without visibility on how these factors have been integrated into the site layout, phasing, and infrastructure design, the Plan is incomplete and unsound in its current form. Request publication of detailed utilities constraints mapping for SNF1-4, consult relevant infrastructure operators, revise the plan to include clear commitments to safeguarding underground services and delivery-critical infrastructure.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.53	File L	Kelvin Carr	SDLP 229	N/A	Members of the Public	Concern over local road functionality and increased congestion. Policy SA5 does not reference any local road assessments or junction capacity testing. The STA does not provide site-specific traffic flow modelling for Strood's internal roads. There are no confirmed local highway upgrades, signal improvements, or traffic calming schemes tied to the SNF allocations. Without local modelling, traffic mitigation plan and consultation with Kent Highways or National Highways about Strood specific impacts believe site allocations SNF1-4 are unsound.	14. Site Allocations	14.6 Strood Town Centre and Surrounds	Policy SA5: Strood Town Centre and Surrounds		No	
Email	E.53	File L	Kelvin Carr	SDLP 230	N/A	Members of the Public	Concern over consultation timing with the consultation period fallen squarely within the peak summer holiday season which raises serious concerns about accessibility, transparency, and meaningful community engagement. Requests extension of consultation period, provide additional engagement opportunities once the summer period ends and publish a clear summary of how responses particularly from communities like Strood North will be reviewed, considered, and addressed.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.204	File U	Kent County Council	SDLP 1311	N/A	Statutory Bodies	General comments made on Minerals and Waste, including: The Plan discusses the uses of chalk, though the County Council understands that extraction for the uses detailed has ceased. It is known that the chalk deposits in the Cliffe area are of high purity and can meet other specified uses as pigmentation agents and other uses (e.g. pharmaceuticals) requiring exceptionally high purity (98% CaCO3 in content). The County Council recommends that this is recognised in the Local Plan. The County Council believes that the Plan fully accords with the relevant national planning policy and is therefore soundly based to assess further needs to achieve and maintain these objectives, that include carbon emission abatement in line with governmental strategies.	11. Minerals Supply				No	
Email	E.204	File U	Kent County Council	SDLP 1312	N/A	Statutory Bodies	The County Council recommends that the supporting documents, in particular, the Heritage Asset Review, be version controlled or have a published date to reflect the accuracy of the document so readers can assess the accuracy of the Heritage Asset Review.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Heritage Asset Review		No	
Email	E.204	File U	Kent County Council	SDLP 1313	N/A	Statutory Bodies	The County Council is pleased to see the commitment to Medway's rich heritage in the first paragraph of the Vision. It would be helpful if the Council could include in its action plans a survey of Medway's heritage and the likely impact of climate change so that managers can assess risk and identify any remedial actions. The County Council considers that the key to conserving and enhancing its intrinsic cultural and natural heritage and landscapes will be ensuring that the Medway Heritage Strategy is fully integrated into relevant decision-making, design and master planning for development proposals as well as blue and green infrastructure (GI) projects. The Strategy was drafted in 2018 and the County Council would urge that this is completed as quickly as possible, to influence development	2. Vision and Strategic Objectives	2.1 Vision	Paragraph 2.1	Medway Council could include in its action plans a survey of Medway's heritage and the likely impact of climate change so that managers can assess risk and identify any remedial actions. Ensure that the Medway Heritage Strategy is fully integrated into relevant decision-making, design and master planning for development proposals as well as blue and green infrastructure (GI) project.	No	

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Email	E.204	File U	Kent County Council	SDLP 1314	N/A	Statutory Bodies	The County Council is pleased that there is a sub-objective dedicated to securing Medway's high quality historic environment. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation. This could usefully be highlighted in the text which at present suggests that making housing more energy efficient must occur only in new buildings. The County Council believes that heritage makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Paragraph 2.2	Highlight in the text that heritage can play in mitigating climate change and historic building adaptation.	No	
Email	E.204	File U	Kent County Council	SDLP 1315	N/A	Statutory Bodies	The County Council welcomes Medway Council's "brownfield first" approach but notes that previously developed land in urban centres may include deeply stratified archaeological sequences. To establish the archaeological potential of brownfield sites it will be necessary to carry out detailed assessments in the form of desk-based assessment and, if appropriate, fieldwork. To ensure that new development on brownfield sites is fully integrated into the existing character of Medway's historic towns, it will also be important to ensure that Conservation Areas Appraisals are completed for all Conservation Areas. The County Council considers that this should also be a recommendation in any action plan. In addition, The County Council suggests that the text be modified to "Medway has a high proportion of land designated of national or international importance for wildlife, heritage and landscape" to give equal priority to these sites to the nature and landscape designations within the Plan area.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3	Modify the text to "Medway has a high proportion of land designated of national or international importance for wildlife, heritage and landscape"	No	
Email	E.204	File U	Kent County Council	SDLP 1316	N/A	Statutory Bodies	The County Council question whether it is appropriate to place the Climate change section within Natural Environment. The County Council would suggest that Climate Change should be a section in its own right to provide further detail into the approach taken to mitigate climate change in the Plan area. Also note that heritage interacts with climate change in a range of ways.	4. Natural Environment				No	
Email	E.204	File U	Kent County Council	SDLP 1317	N/A	Statutory Bodies	The County Council notes that there is a typographical error in Paragraph 4.2.1. The County Council recommends that the sentence be amended to read as 'The Hoo Peninsula is particularly vulnerable to rising sea levels.'	4. Natural Environment	4.2 Planning for climate change	Paragraph 4.2.1	Paragraph 4.2.1 to be amended to read as 'The Hoo Peninsula is particularly vulnerable to rising sea levels.'	No	
Email	E.204	File U	Kent County Council	SDLP 1318	N/A	Statutory Bodies	Sustainable Urban Drainage Systems (SuDS) - The County Council, as the Lead Local Flood Authority (LLFA) for Kent, believes that some of the wording within Policy S1 could be made clearer. In particular, the sentence "Existing surface water flow routes and drainage features within the site should be identified and preserved wherever these contribute to sustainable drainage e.g. ditches, seasonally dry watercourses or historic ponds" could be strengthened to include the preservation of watercourses in all eventualities and not only associated with a SuDS system. Furthermore, watercourses can be diverted and managed in order to facilitate development, but this would need to be done through the submission of evidence which is accepted and consented by the Council's Land Drainage Officer/LLFA. Also there is a lack of consideration given towards SuDS in relation to brownfield sites. Water reuse is now cited as a primary method for the management of surface water within the National standards for SuDS, and should be given consideration within the Plan. The County Council is currently considering requiring any new development upstream of a known 'Flood Hotspot' to be restricted to the equivalent greenfield two-year runoff rate for all rainfall events. The County Council advises the provision of flood betterment through new development, and this be detailed in the Local Plan. Also advise that 'water reuse' is the now considered the top of the hierarchical list of the new Defra SuDS Standards recently released and so will be required to be considered as part of all developments going forward. The County Council welcomes the mention of reducing water consumption	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Policy S1 Sustainable Urban Drainage Systems (SuDS) - the sentence "Existing surface water flow routes and drainage features within the site should be identified and preserved wherever these contribute to sustainable drainage e.g. ditches, seasonally dry watercourses or historic ponds" could be strengthened to include the preservation of watercourses in all eventualities and not only associated with a SuDS system. Also suggest: "schemes achieving less than 110l/p/d will be actively encouraged"	No	
Email	E.204	File U	Kent County Council	SDLP 1319	N/A	Statutory Bodies	The County Council recommends that the policy wording be strengthened to refuse applications that are not able to evidence how the development will avoid, mitigate or compensate significant harm to the natural environment.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Policy S2 wording be strengthened to refuse applications that are not able to evidence how the development will avoid, mitigate or compensate significant harm to the natural environment.	No	

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Email	E.204	File U	Kent County Council	SDLP 1320	N/A	Statutory Bodies	The County Council feels it is important for the proposed update to the Medway Landscape Character Assessment to consider the Historic Landscape Characterisation. The County Council understands that this has only been completed for the Hoo Peninsula and would urge Medway Council to extend the Historic Landscape Characterisation across the rest of Medway and draw on the research to inform the Landscape Character Assessment.	4. Natural Environment	4.5 Landscape protection and enhancement	Paragraph 4.5.5		No	
Email	E.204	File U	Kent County Council	SDLP 1321	N/A	Statutory Bodies	* Green infrastructure (GI) should follow historic roads and routes to integrate new development with existing landscapes. * This approach links heritage and ecology, improves access to green features, and encourages conservation. * Highlighting historic sites within GI can reduce antisocial use and boost tourism by connecting key attractions.	4. Natural Environment	4.6 Securing strong green and blue infrastructure			No	
Email	E.204	File U	Kent County Council	SDLP 1322	N/A	Statutory Bodies	When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. The County Council has recently produced guidance for SuDS and the historic environment.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.17		No	
Email	E.204	File U	Kent County Council	SDLP 1323	N/A	Statutory Bodies	Sustainable Urban Drainage Systems (SuDS): The County Council, as the LLFA for Kent, believes there to be a typographical error in the sentence and that it should read "For those development sites which have not passed the Sequential Test, the proposed development must pass the Exception Test."	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Correct the typographical error in the sentence so that it should read "For those development sites which have not passed the Sequential Test, the proposed development must pass the Exception Test....."	No	
Email	E.204	File U	Kent County Council	SDLP 1324	N/A	Statutory Bodies	The County Council notes that the Hoo Peninsula has a range of material that is available to help developers design new development that is in character with existing heritage assets including the Hoo Peninsula Historic Landscape Project. There are the historic town surveys for Rochester, Gillingham and Chatham. These are still very useful for identifying historic character and relevant heritage assets ~~Kent FLPs Introduction~~	5. Built Environment	5.1 Introduction	Paragraph 5.1.2		No	
Email	E.204	File U	Kent County Council	SDLP 1325	N/A	Statutory Bodies	KCC believes that Policy DM6 would be of benefit from clarifying that new proposals be required to meet the new Defra SuDs Standards.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Clarify that new proposals be required to meet the new Defra Standards.	No	
Email	E.204	File U	Kent County Council	SDLP 1326	N/A	Statutory Bodies	KCC welcomes Policy S8, with clear linking with the Medway Heritage Strategy and highlights roles of both designated and non-designated heritage assets. KCC suggests that bullet point 2 of Policy S8 be amended to "Ensuring development sustains or enhances designated and non-designated heritage assets and their settings in a manner appropriate to their significance." As this permits ~~more flexibility than 'preserve'~~	5. Built Environment	5.7 Historic environment	Policy S8: Historic Environment	Suggests that bullet point 2 of Policy S8 be amended to "Ensuring development sustains or enhances designated and non-designated heritage assets and their settings in a manner appropriate to their significance."	No	
Email	E.204	File U	Kent County Council	SDLP 1327	N/A	Statutory Bodies	KCC welcomes the Council's commitment to creating a Local Heritage List and encourages the Council to ensure that this includes archaeological sites and historic landscape features as well as buildings. Also the text in section 5.8.10 notes the importance of CAA for identifying non-designated assets. KCC therefore encourages the Council to ensure that all Conservation Areas have CAAs ~~prepared~~	5. Built Environment	5.8 Heritage assets	Paragraph 5.8.10		No	
Email	E.204	File U	Kent County Council	SDLP 1328	N/A	Statutory Bodies	KCC suggests policy wording could be restructured to state the main types of assets that the policy is intended to cover at the beginning – historic buildings, parks and gardens and historic landscape features. Then, for each type, state what information should be supplied with the planning application. Also suggests the word 'preserve' be amended to 'sustain' as this allows more flexibility. The third paragraph dealing with loss or substantial harm to significance of designated heritage assets needs amending to better align with NPPF paragraph 214, which not only requires that substantial public benefits outweigh any substantial harm or loss of significance, but critically also that such harm is necessary to achieve those substantial	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	Suggests policy wording could be restructured to state the main types of assets that the policy is intended to cover at the beginning – historic buildings, parks and gardens and historic landscape features. Then, for each type, state what information should be supplied with the planning application. Also suggests the word 'preserve' be amended to 'sustain' as this allows more flexibility. The third paragraph dealing with loss or substantial harm to significance of designated heritage assets needs amending to better align with NPPF paragraph 214	No	
Email	E.204	File U	Kent County Council	SDLP 1329	N/A	Statutory Bodies	Suggests explaining that HAZ stands for Heritage Action Zone and what that represents. At present the acronym is left unexplained.	5. Built Environment	5.9 Star Hill to Sun Pier	Paragraph 5.9.2	Explain that HAZ stands for Heritage Action Zone and what that represents.	No	
Email	E.204	File U	Kent County Council	SDLP 1330	N/A	Statutory Bodies	Welcome Policy DM10 and encourages the Council to ensure that all Conservation Areas have accompanying CAAs.	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas		No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.204	File U	Kent County Council	SDLP 1331	N/A	Statutory Bodies	Welcomes the recognition that there will be archaeological sites in Medway that may not be scheduled but which are of equivalent significance. Suggests that text be added to the end of paragraph 5.11.6 to say: "Where such assessment reveals that important or potentially significant archaeology may be present, developers will be required, where necessary, to undertake a field evaluation in advance of the determination of a planning application. In all instances developers should look for opportunities to avoid or minimise harm to archaeological remains."	5. Built Environment	5.11 Scheduled monuments and archaeological sites	Paragraph 5.11	Suggests that text be added to the end of paragraph 5.11.6 to say: "Where such assessment reveals that important or potentially significant archaeology may be present, developers will be required, where necessary, to undertake a field evaluation in advance of the determination of a planning application. In all instances developers should look for opportunities to avoid or minimise harm to archaeological remains."	No	
Email	E.204	File U	Kent County Council	SDLP 1332	N/A	Statutory Bodies	The Kent Farmsteads Guidance has been endorsed by the County Council, and it is recommended that Medway Council considers adopting the guidance as Supplementary Planning Documents as part of the Local Plan process.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy	Suggests adopting the Kent Farmsteads Guidance as SPD as part of Local Plan process.	No	
Email	E.204	File U	Kent County Council	SDLP 1333	N/A	Statutory Bodies	KCC supports transport policies overall but highlights a specific risk around M2 J4. The draft Local Plan places full responsibility for J4 mitigation/upgrades on the Lidsing Garden Settlement in Maidstone, despite wider growth extending north through Capstone Valley. J4 improvements are not costed in the Infrastructure Delivery Plan, and the Plan's assumption that Lidsing is "near certain" relies on another authority and National Highways approvals and funding. KCC requests clarity on whether housing allocations will be	9. Transport				No	
Email	E.204	File U	Kent County Council	SDLP 1334	N/A	Statutory Bodies	KCC recommends that the worst-case scenario for highway trips will not be used to inform the IDP. It could be argued that 'vision and validate' and 'monitor and manage' approaches do not mean ignoring the worst case, but rather better understanding the less worst-cases to develop a range of triggerable interventions that should be implemented, dependent on what is monitored as occurring post-site delivery.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.12		No	
Email	E.204	File U	Kent County Council	SDLP 1335	N/A	Statutory Bodies	The Local Plan caps vehicle trips per site via a "trip credit" system but is unclear how actual post-build trips affect the overall budget, unused credits, enforcement, or additional mitigation funding. The budget assumes delivery of walking, cycling and Bus Rapid Transit measures; it gives no contingency if those measures fail, nor a stated threshold where further highway mitigation becomes unfeasible. Behavioural measures (travel plans, packs, cycle parking, contributions) are relied on despite limited local evidence of success; KCC asks for proven case studies to justify these	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		No	
Email	E.204	File U	Kent County Council	SDLP 1336	N/A	Statutory Bodies	KCC notes the Local Plan's reference to a comprehensive improvement scheme for Blue Bell Hill requiring new development in Medway to make a proportionate contribution, thereby avoiding unnecessary minor abortive works. KCC welcomes support from Medway Council towards the realisation of the Blue Bell Hill improvement scheme. It is important that this position is maintained through the planning process and that contributions are identified in order to unlock the required Government funding.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.15		No	
Email	E.204	File U	Kent County Council	SDLP 1337	N/A	Statutory Bodies	KCC appreciates the reference made to its potential involvement as a neighbouring transport authority in scoping Transport Assessments for development where there is potential for impact on the County Council Highway Network, ideally during the pre-application stage.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Paragraph 9.11.16		No	
Email	E.204	File U	Kent County Council	SDLP 1338	N/A	Statutory Bodies	Transport model findings — key risks: The Medway Transport Model's Regulation 19 forecast shows residual peak-hour traffic increases on parts of the county network, notably at Cliffe Woods and the A228 Peters Bridge Roundabout. The A228 PM peak could experience substantial queuing (up to about 210 vehicles), indicating a significant local impact. Requested actions: Further assessment of impacts and potential mitigation options is needed, or these junctions should be explicitly included in the Local Plan's Monitor and Manage strategy so responses can be triggered if problems emerge. Proposed highway schemes should be redesigned as they progress to incorporate buses, cycling and pedestrian facilities to align with the Plan's sustainable and	9. Transport	9.9 User hierarchy and street design	Paragraph 9.9		No	

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Email	E.204	File U	Kent County Council	SDLP 1339	N/A	Statutory Bodies	Supports the policy requirements for development to meet certain quality standards and that new open space can provide "multi-functional benefits such as addressing surface water management priorities without compromising access." KCC takes the view that as a result of this policy statement, Medway Council accepts the use of open space for the management of water subject to it not compromising access. KCC advises that developers may query what would be deemed to compromise access, and that as a result Medway Council may wish to draft a form of specific guidance. The County Council, as an LLFA, is happy to support in this if required.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces		No	
Email	E.204	File U	Kent County Council	SDLP 1340	N/A	Statutory Bodies	The Plan's mineral importation safeguarding policy is clear on which sites are safeguarded and what criteria is required to be satisfied in order to prevent development that may prejudice or prevent their operation. KCC recommends that the policy be amended to include the phrase 'direct loss' to clarify that the degree of prejudice is included.	11. Minerals Supply	11.3 Safeguarding of existing mineral supply infrastructure	Policy T31: Safeguarding of existing mineral supply infrastructure	Suggest policy be amended to include the phrase 'direct loss' to clarify that the degree of prejudice is included.	No	
Email	E.204	File U	Kent County Council	SDLP 1341	N/A	Statutory Bodies	Notes that the manufacturing of recycled and secondary aggregates, to provide alternative supply other than the primary land won supply, is included in the Plan. The approach towards aggregates accords with the NPPF's drive towards great resource efficiency in construction materials supply. The policy also includes the possibility of using materials from disused inert landfill sites and dredging disposal sites; this is a potential source of materials that is generally not exploited and thus the policy is novel in its	11. Minerals Supply	11.4 Supply of recycled and secondary aggregates	Policy T32: Supply of recycled and secondary aggregates		No	
Email	E.204	File U	Kent County Council	SDLP 1342	N/A	Statutory Bodies	Notes that on the proposals map (taken as Fig 8), extraction of aggregate will be acceptable in principle if it is within the 'Areas of Search', contributes to the maintenance of the required 7-year landbank and contributes to regional requirements' concludes that the Areas of Search are coincident with what is safeguarded and is also a MSA for this mineral type. KCC believes that greater clarity should be provided on what is and what is not considered to be a safeguarded industrial mineral. This would further assist in the interpretation of how land won economic minerals are addressed by the Plan. Also there needs to be a recognition in the Local Plan that Policy T33 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not	11. Minerals Supply	11.5 Extraction of land won minerals	Policy T33: Extraction of land won minerals	Greater clarity should be provided on what is and what is not considered to be a safeguarded industrial mineral. This would further assist in the interpretation of how land won economic minerals are addressed by the Plan. Also there needs to be a recognition in the Local Plan that Policy T33 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for T33.	No	
Email	E.204	File U	Kent County Council	SDLP 1343	N/A	Statutory Bodies	Supports that the policy not only requires the minimisation of waste generation, but also requires developers to produce Circular Economy Statements to detail the management of wastes at all stages of development. KCC's recently adopted Kent Minerals and Waste Local Plan 2024-39 has a similar policy provision, therefore it is not considered to be an unjustifiable requirement of developers putting forward development proposals.	12. Waste Management	12.3 Waste prevention	Policy DM23: Waste prevention		No	
Email	E.204	File U	Kent County Council	SDLP 1344	N/A	Statutory Bodies	KCC supports safeguarding all existing and future lawfully permitted waste management capacity through Policy T34. Policy T34's safeguarding presumption explicitly covers sites with extant permissions, including temporary permissions, and sites that obtain permission during the Plan period to 2041. The policy title could be misread as excluding newly permitted sites after adoption; KCC suggests renaming it to "Safeguarding of all Lawfully Permitted Waste Management Facilities." T34 includes clear criteria allowing departures from safeguarding where proposed development would directly remove or prejudice viable waste operations, providing flexibility to balance sustainability objectives without unnecessary loss of waste infrastructure.	12. Waste Management	12.4 Safeguarding of existing waste management facilities	Policy T34: Safeguarding of existing waste management facilities	KCC suggests renaming the Policy T34 to "Safeguarding of all Lawfully Permitted Waste Management Facilities."	No	
Email	E.204	File U	Kent County Council	SDLP 1345	N/A	Statutory Bodies	KCC accepts the Local Plan's waste forecasts and capacity needs across all waste streams. Additional capacity is expected to be delivered during the Plan period to meet hierarchy targets. Policy T35 is a permissive, criteria-based policy setting core expectations to support the waste vision. Other policies cover specific activities (recovery, non-inert landfill, beneficial inert use, wastewater treatment). Recycling below "minimisation" is not a separate policy but is treated as integral to the Plan's efficient waste	12. Waste Management	12.5 Provision of new waste management facilities	Policy T35: Provision of additional waste management facilities		No	

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Email	E.204	File U	Kent County Council	SDLP 1346	N/A	Statutory Bodies	KCC views Policy T36 to be a supportive criteria-based policy that addresses all the usual potentially suitable locations for the various types of waste management development. This approach may be regarded as affording less certainty to the industry. However, it is not thought that this is an impediment of any significant magnitude and does not endanger the Plan as being less effective under the ~~test of soundness of a Local Plan~~	12. Waste Management	12.6 Location of waste management facilities	Policy T36: Location of waste management facilities		No	
Email	E.204	File U	Kent County Council	SDLP 1347	N/A	Statutory Bodies	KCC feels that there needs to be a recognition in the Local Plan that policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for ~~all these policies~~	12. Waste Management	12.7 Other recovery	Policy T37: Other recovery	Policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for all these policies.	No	
Email	E.204	File U	Kent County Council	SDLP 1348	N/A	Statutory Bodies	KCC feels that there needs to be a recognition in the Local Plan that policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for ~~all these policies~~	12. Waste Management	12.8 Landfill	Policy T38: Non-inert Landfill	policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for all these policies.	No	
Email	E.204	File U	Kent County Council	SDLP 1349	N/A	Statutory Bodies	KCC feels that there needs to be a recognition in the Local Plan that policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for ~~all these policies~~	12. Waste Management	12.10 Wastewater treatment	Policy T40: Wastewater treatment	policies T37, T38 and T40 should accord with other Local Plan policies. It is noted that Policies T36 and T39 both make mention of the need to accord with other policies in the plan, but this requirement is not specified for all these policies.	No	
Email	E.204	File U	Kent County Council	SDLP 1350	N/A	Statutory Bodies	KCC welcome the requirement to consider archaeology as part of all applications for site allocations. However, KCC suggests the requirement should be for the submission of an Archaeological Assessment (rather than Archaeological Statement) to better reflect the language used elsewhere in ~~the plan document~~	14. Site Allocations	14.1 Introduction	Paragraph 14.1.7	KCC suggests the requirement should be for the submission of an Archaeological Assessment (rather than Archaeological Statement) to better reflect the language used elsewhere in the plan document.	No	
Email	E.204	File U	Kent County Council	SDLP 1351	N/A	Statutory Bodies	KCC supports identifying the Frindsbury Peninsula as an opportunity area for redevelopment to better relate to Chatham Historic Dockyard and nearby heritage assets. The site has archaeological potential, including deeply buried geoarchaeological layers. These deposits could improve understanding of historical human impact, past ecological change in the Medway ~~valley and regional climate and relative sea level change~~	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		No	
Email	E.204	File U	Kent County Council	SDLP 1352	N/A	Statutory Bodies	KCC welcomes engagement on A289 Wainscott Bypass but flags wider impacts on Medway's A289. Additional at-risk routes previously raised as concerns by KCC are: M2 J1 (Grain), A229 Blue Bell Hill (and Bredhurst/Boxley), Lower Road (Higham), and the A2 eastbound. These routes should be included in the Local Plan's Monitor and Manage strategy and in transport assessments for allocations and windfall sites. KCC requests crash-record evidence where traffic is expected to rise to check safety impacts and mitigation needs. Current modelling does not show significant impacts on these routes versus the Reference Case, so clearer ~~justification and inclusion of sustainable-mode facilities in~~	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Transport Assessment – Forecasting Report	Suggests the following routes should be included in the Local Plan's Monitor and Manage strategy and in transport assessments for allocations and windfall sites: M2 J1 (Grain), A229 Blue Bell Hill (and Bredhurst/Boxley), Lower Road (Higham), and the A2 eastbound. Requests crash-record evidence where traffic is expected to rise to check safety impacts and mitigation needs.	No	
Email	E.204	File U	Kent County Council	SDLP 1353	N/A	Statutory Bodies	KCC supports the Sustainability Appraisal Framework's Climate Change Adaptation objective for assessing policies and site allocations. KCC also recommends stronger, explicit adaptive measures within site allocation policies to increase development resilience to climate risks. KCC urges Policy S25: Energy Supply to be aligned more closely with the adaptation objective through similar ~~measures~~	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal - Non-Technical Summary	KCC recommends stronger, explicit adaptive measures within site allocation policies to increase development resilience to climate risks. KCC urges Policy S25: Energy Supply to be aligned more closely with the adaptation objective through similar strengthening.	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4757	N/A	Statutory Bodies	Concerned that the vision does not explicitly state the natural beauty of the Kent Downs National Landscape will be conserved and enhanced - not compliant with LURA.	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041	'Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes, including the natural beauty of the Kent Downs National Landscape , alongside delivering high quality development to strengthen the area's distinctive character. [...]		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4758	N/A	Statutory Bodies	Support	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable and green future			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4760	N/A	Statutory Bodies	Include KDNL in key diagram	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.7	Kent Downs National Landscape designation should be included in the Key Diagram	No	

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Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4761	N/A	Statutory Bodies	Reflect requirements of NPPF and LURA more accurately.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.8	'There are also large areas designated of international and national environmental importance. In considering potential development allocations in suburban and rural areas, the Council acknowledges the need to conserve and enhance these important habitats and landscapes, including the natural beauty of the Kent Downs National Landscape , and to plan at an appropriate scale to support effective infrastructure delivery.'		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4762	N/A	Statutory Bodies	Support	3. Spatial Development Strategy			Supporting text and key diagram: Request the following amendments: o Add Kent Downs National Landscape designation to the Key Diagram o Amend paragraph 3.1.8 to more accurately reflect the requirements of the NPPF paragraph 188 and the LURA Protected Landscapes Duty as follows: 'There are also large areas designated of international and national environmental importance. In considering potential development allocations in suburban and rural areas, the Council acknowledges the need to conserve and enhance these important habitats and landscapes, including the natural beauty of the Kent Downs National Landscape , and to plan at an appropriate scale to support effective		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4763	N/A	Statutory Bodies	Policy S6 should follow S3 and S7 move earlier in the chapter.	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape & Paragraph 4.1.1	For clarity, we suggest that Policy S6 Kent Downs National Landscape is moved to sit immediately after Policy S3 in order to reflect the hierarchy of international and national designated landscapes in Medway.		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4763	N/A	Statutory Bodies	Policy S6 should follow S3 and S7 move earlier in the chapter.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt & Paragraph 4.1.1	For clarity, we suggest that Policy S7 would sit better earlier on in the chapter rather than at the end as is currently drafted, where it appears adrift from the other strategic policies.		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4764	N/A	Statutory Bodies	* Object to 10% biodiversity net gain - not consistent with the Kent Downs AONB management plan * 20% should be requested for policy SA6 * SA6 needs to facilitate delivery of extensive structural landscaping, wildlife biodiversity habitat creation and enhance existing ecological networks.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Request BNG requirement of 20% in line with Principle BD9 of the adopted AONB Management Plan 2021 - 26. In particular we wish to see a BNG requirement of 20% for the strategic allocation at Strood West (SA6). In addition, we request the following amendments to the supporting text wording for accuracy: o Amend paragraph 4.3.4: 'National planning policy states that policies and decisions should ~~contribute to~~ give great weight to conserving and enhancing landscape and scenic beauty of National Landscapes and should contribute to and enhance the natural and local	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4764	N/A	Statutory Bodies	* Object to 10% biodiversity net gain - not consistent with the Kent Downs AONB management plan * 20% should be requested for policy SA7 * SA7 needs to facilitate delivery of extensive structural landscaping, wildlife biodiversity habitat creation and enhance existing ecological networks.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Request BNG requirement of 20% in line with Principle BD9 of the adopted AONB Management Plan 2021 - 26. In particular we wish to see a BNG requirement of 20% for the strategic allocation at Capstone Valley (SA7) In addition, we request the following amendments to the supporting text wording for accuracy: o Amend paragraph 4.3.4: 'National planning policy states that policies and decisions should ~~contribute to~~ give great weight to conserving and enhancing landscape and scenic beauty of National Landscapes and should contribute to and enhance the natural and local	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4765	N/A	Statutory Bodies	Amendments suggested Check hard copy rep	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Paragraph 4.3.4	In addition, we request the following amendments to the supporting text wording for accuracy: o Amend paragraph 4.3.4: 'National planning policy states that policies and decisions should ~~contribute to~~ give great weight to conserving and enhancing landscape and scenic beauty of National Landscapes and should contribute to and enhance the natural and local environment.'		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4766	N/A	Statutory Bodies	Support	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4767	N/A	Statutory Bodies	Include national landscape layer in figure 2.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Figure 2: Green and Blue Corridors, from Medway Green and Blue Infrastructure Framework (Draft)			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4768	N/A	Statutory Bodies	Support	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Supporting text: Request the following amendment for accuracy: o Amend Figure 2 to include a National Landscape layer within "Tier 1: designated sites SPA SAC Ramsar, National Landscape and SSSI "		

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Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4769	N/A	Statutory Bodies	Amendments suggested	4. Natural Environment	4.7 Kent Downs National Landscape	Paragraph 4.7.2	amend paragraph 4.7.2 'These are the West Kent Downs, Medway Valley and Mid Kent Downs landscape character areas. and this supporting evidence for The Kent Downs management plan provides guidance specific to each area.		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4770	N/A	Statutory Bodies	Amendments suggested	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape	We request only a minor alteration to criteria e e. landscapes- landscape components of cultural, historic and heritage value; Supporting text: request a number of minor wording changes for accuracy: o Landscape Character Areas are part of the Kent Downs Management Plan and not supporting evidence to it. Therefore: amend paragraph 4.7.2 'These are the West Kent Downs, Medway Valley and Mid Kent Downs landscape character areas. and this supporting evidence for The Kent Downs management plan provides guidance specific to each area. o The National Landscape has a single purpose. Therefore: amend paragraph 4.7.5 'The purpose of the National Landscape is primarily to conserve and enhance natural beauty'. o Suggest reference to cross border green networks in paragraph 4.7.7 is replaced with cross boundary green networks as districts, and the National Landscape, have boundaries and not borders.		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4771	N/A	Statutory Bodies	suggested amendment	4. Natural Environment	4.7 Kent Downs National Landscape	Paragraph 4.7.5	Therefore request amending paragraph 4.7.5 by deleting 'primarily'		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4772	N/A	Statutory Bodies	suggested amendment	4. Natural Environment	4.7 Kent Downs National Landscape	Paragraph 4.7.7	Suggest reference to cross-border green networks in paragraph 4.7.7 is replaced with cross boundary green networks as districts, and the National Landscape, have boundaries and not borders.		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4773	N/A	Statutory Bodies	Include tranquillity in policy S4 instead.	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4774	N/A	Statutory Bodies	Support	5. Built Environment	5.2 High quality design	Paragraph 5.2.9			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4775	N/A	Statutory Bodies	* Policy T3 should set a lower affordable housing requirements of 6 units or more on windfall sites in the National Landscape * Viability assessment at para 2.50 is incorrect - not consistent with NPPF * Affordable housing requirements in T3 is unclear	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	Consider that this Policy should explicitly establish a lower site threshold of 6 units or more for affordable housing provision on windfall sites that come forward for development in the National Landscape over the Plan period in line with NPPF para 65. Consider that this policy lacks necessary clarity on differing levels of affordable housing that will be applied across the district.	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4776	N/A	Statutory Bodies	support	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Paragraph 7.6.4			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4777	N/A	Statutory Bodies	support	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4778	N/A	Statutory Bodies	Concerned at the absence of criteria included in policies allocating sites that have the potential to impact on the Kent Downs National Landscape. Site specific criteria is needed.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.8	We are concerned at the absence of criteria included in policies allocating sites that have the potential to impact on the Kent Downs National Landscape. Without the assurances of site-specific requirements, the Plan does not provide the necessary certainty that sites would be delivered in a way that would conserve and enhance the natural beauty of the Kent Downs National Landscape as required by the CROW ACT Section 85 duty.	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4779	N/A	Statutory Bodies	Amendments suggested in policy to clarify expectations of landscaping and advocating 20% BNG	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	At 4b, we recommend that further clarification of the expectation is provided 'b The structural landscaping will be planted at an early stage of the development and provide new habitats for priority nature conservation species and be appropriate to landscape character'		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4780	N/A	Statutory Bodies	Agree on landscape led approach informed by views analysis.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West & Paragraph 14.7.4			

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Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4781	N/A	Statutory Bodies	* support KDNL mentioned in Capstone Valley site allocation background text. * SA7 however lacks inclusion of any wording that would address the setting of the KDNL - conflict with NPPF and KD AONB management plan. * Address by: Policy must include requirements for landscape led development, respond to its location within the setting of the KDNL and avoid or minimise impact on designated areas. *criterion 6 - include requirements for positive enhancements etc. * provide requirements to avoid rat running and increased traffic through Boxley for example * policy fails to address the impacts of the increased population and use of local roads in the KDNL and North Downs Woodland SAC	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	The policy wording fails to refer to, or include any requirement for development to respond to the site's location within the KDNL setting. We consider that given the strategic scale of the proposed allocation, this should be addressed. Without such provisions, we consider it is not demonstrated that the allocation would be consistent with national planning policy and in particular paragraph 189 of the NPPF. In order to address this, we would recommend that the policy wording includes requirements for the development to be landscape led and to respond to its location within the setting of the Kent Downs National Landscape and be designed to avoid or minimise adverse impacts. It is also considered that there should be requirements within criterion (6) for positive enhancements to the Capstone Valley and the setting of the KDNL, the provision of recreational connections with the KDNL and for strategic and internal landscaping that respects the site's visual and physical relationship with the Kent Downs. Supporting text: Amend Paragraph 14.8.1 to more accurately reflect the designation targets of the Kent Downs "The Capstone Valley forms a steep- sided dry valley, consistent in landscape character to the Kent Downs National Landscape, ~~which was the target~~ with dry-sided valleys alongside the North Downs escarpment being the main target of for the original designation of the Kent Downs".	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4782	N/A	Statutory Bodies	Amendments needed to accurately reflect the designation targets of the Kent Downs. More comments in email	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.1	Supporting text: Amend Paragraph 14.8.1 to more accurately reflect the designation targets of the Kent Downs "The Capstone Valley forms a steep- sided dry valley, consistent in landscape character to the Kent Downs National Landscape, ~~which was the target~~ with dry-sided valleys alongside the North Downs escarpment being the main target of for the original designation of the Kent Downs".		
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4783	N/A	Statutory Bodies	Object to wording of para 14.12.6 - wording suggested.	14. Site Allocations	14.12 Rural Settlements	Paragraph 14.12.6	Amend Paragraph 14.8.1 to more accurately reflect the designation targets of the Kent Downs "The Capstone Valley forms a steep- sided dry valley, consistent in landscape character to the Kent Downs National Landscape, which was the target with dry-sided valleys alongside the North Downs escarpment being the main target of for the original designation of the Kent Downs"	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4784	N/A	Statutory Bodies	* SA11 needs site specific criteria * specific comment on site CHR14 - sensitivity on the east, site specific criteria is needed, landscape evidence.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements (Site CHR14)	Object to the highly limited criteria included in this policy, particularly with regard to Site CHR14. Without the assurances of site-specific requirements, the Plan does not provide the necessary certainty that sites would be delivered in a way that would conserve and enhance the natural beauty of the Kent Downs National Landscape as required by the CROW ACT Section 85 duty. Suggested criteria are set out in our response. Taking these matters into account, we consider it essential that the proposed allocation for this site include specific criteria that set out the design expectations for development of this sensitive site, to include the following requirements: oBuilt form to be limited to the south-western part of the site only, where it would be viewed in the context of existing built form associated with Cuxton. oVariation to the front (riverside) elevations so a flat face is not presented, and avoidance of a horizontal emphasis to built form. o A maximum of two and a half -storey height of development. oSpacing between buildings to avoid a continuous block of built form in views from the opposite side of the river. oThe incorporation of tree planting along river front and between apartment or housing blocks to help filter views of the built form and integrate the development into the landscape. oA requirement for materials to be neutral and the use of recessive colours rather than light colours and to have a matt finish. oThe proposal also has potential for nighttime effects due	No	

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Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4785	N/A	Statutory Bodies	* Needs site specific criteria * HW6 - site specific criteria needed, concerned about the cumulative impact of development of this site, the adjacent strategic allocation at Capstone Valley (SA7) and the allocation at Lidsing * RWB2 - needs site specific criteria	14. Site Allocations	14.13 Other sites	Policy SA12: Other Sites	Object to the lack of any criteria in this policy. Without the assurances of site-specific requirements, the Plan does not provide the necessary certainty that sites would be delivered in a way that would conserve and enhance the natural beauty of the Kent Downs National Landscape as required by the CROW ACT Section 85 duty. Particularly require site-specific criteria for allocations HW6 and RWB2 RWB2: We consider that the policy for this site should include specific criteria that set out the design expectations for development, to include the following requirements: oA maximum of two and a half -storey height of development. oSpacing between buildings to avoid a continuous block of built form in views from the higher ground to the south west and from the opposite side of the river. oThe retention of mature planting and the planting of trees between apartment or housing blocks to help filter views of the built form and integrate the development into the landscape including the recreation ground and nature reserve of Baty's Marsh to the north east. oA requirement for materials to be neutral and the use of recessive colours rather than light colours and to have a matt finish. oThe proposal also has potential for nighttime effects due to the introduction of lighting including light emanating from (envisaged) large areas of glazing on western facing elevations. Ways of managing/reducing the impacts of this in nighttime views and also impacts from the reflectiveness of glazing should also be considered.	No	
Online	966	Online (OPUS)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	4786	N/A	Statutory Bodies	* policy needs site-specific criteria: two of the sites site with the setting of the KDNL and therefore should require development to be sensitively designed to avoid or minimise harm. * CHR16 - object to lack of specific criteria to guide development within the setting of the KDNL. This site allocation should require retention of woodland belt. Western boundary is much more sensitive and therefore needs appropriate safeguards in policy to ensure the amenity and enjoyment of users of this national trail are not harmed by development. * RWB5 - within the setting of the KDNL. Object to lack of specific criteria to guide development within the setting of the KDNL.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	We are not able to support this policy without the security of site-specific criteria. Given that two of the site allocations CHR16 and RWB5 covered by this Policy lie in the immediate setting of the National Landscape such criteria should require that development is sensitively designed to avoid or minimize harm to the natural beauty of the Kent Downs National Landscape. Without the assurances of site-specific requirements, the Plan does not provide the necessary certainty that sites would be delivered in a way that would conserve and enhance the natural beauty of the Kent Downs National Landscape as required by the CROW ACT Section 85 duty. CHR16 We therefore consider the policy should be amended to include site-specific criteria limiting building height and massing here as well as the use of recessive colours with a matt finish to avoid or minimize harm to the protected landscape of the Kent Downs, particularly given its employment designation and the larger bulk and massing that is commonplace with such commercial buildings. The site is heavily wooded at its western end. We consider it essential that the site allocation policy requires the retention of this mature woodland belt in the interests of conserving and enhancing the landscape and scenic beauty of the KDNL. Furthermore, the North Downs Way runs along the western boundary, increasing the sensitivity of the site. We object to the lack of inclusion of appropriate safeguards in the policy wording to ensure that the amenity	No	
Email & OPUS	E.95	File U	Kent Downs National Landscape	SDLP 331	N/A	Statutory Bodies	object to 10% BNG. This is not consistent with the KDNL Management plan, which is set at 20%.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email & OPUS	E.95	File U	Kent Downs National Landscape	SDLP 332	N/A	Statutory Bodies	Para 65 of the NPPF allows LP policies to set lower thresholds for the provision of AH in designated rural area. Viability Assessment (para 2.50) does not identify designated rural areas. This is not correct. Policy T3 should establish a lower threshold of 6 units or more of AH on windfall sites in the KDNL. It is currently not consistent with NPPF - therefore unsound	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Include lower threshold of 6 units or more of Affordable Housing on windfall sites in the KDNL.		
Email	E.49	File B	Kent SME Network	SDLP 193	Esquire Developments	Developers or Agents	Support. However, there is limited recognition within the Vision of the role housing will play in achieving other aspirations i.e. funding infrastructure delivery, creating accessible green spaces and leading to improvements to health, delivering economic growth. There is a missed opportunity to reflect the objective of the Plan to support and speed-up delivery from SME developers	2. Vision and Strategic Objectives	2.1 Vision			Yes	

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Email	E.49	File B	Kent SME Network	SDLP 194	Esquire Developments	Developers or Agents	In order to avoid any danger that a delay to the adoption of the plan results in less than the required 15 year timeframe, we suggest the Council consider if a modification to extend to the Plan period to at least 2041/42 to provide flexibility and thus ensuring the Plan covers the required 15-year period post adoption.	1. Overview	1.3 How the plan has been prepared		suggest the Council consider if a modification to extend to the Plan period to at least 2041/42 to provide flexibility and thus ensuring the Plan covers the required 15-year period post adoption.	Yes	
Email	E.49	File B	Kent SME Network	SDLP 195	Esquire Developments	Developers or Agents	It is not clear whether any further consideration has been given to a housing requirement above minimum housing needs to reflect other potential growth ambitions i.e. increasing affordable housing delivery or spreading the cost of infrastructure over an increased number of homes. The Council could consider that some Evidence Base detailing this is prepared.	1. Overview	1.3 How the plan has been prepared		The Council could consider that some Evidence Base detailing this is prepared.	Yes	
Email	E.49	File B	Kent SME Network	SDLP 196	Esquire Developments	Developers or Agents	Hsuing supply in LAA is different to LP - please clarify. Should any further housing allocations be required in order to meet housing requirements, i.e. sites fall away, the Plan period is extended, or there is justification for an increased housing requirement, the focus should be on sites which can deliver early in the Plan period.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5 - 1.3.6		Yes	
Email	E.49	File B	Kent SME Network	SDLP 197	Esquire Developments	Developers or Agents	Provide clarification on IDP content. Provide clarification of contributions required and that infrastructure can be delivered and support the level of growth planned.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.49	File B	Kent SME Network	SDLP 198	Esquire Developments	Developers or Agents	Provide clarification on IDP content. Provide clarification of contributions required and that infrastructure can be delivered and support the level of growth planned.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.49	File B	Kent SME Network	SDLP 199	Esquire Developments	Developers or Agents	Provide clarification on IDP content. Provide clarification of contributions required and that infrastructure can be delivered and support the level of growth planned.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	
Email	E.49	File B	Kent SME Network	SDLP 200	Esquire Developments	Developers or Agents	Provide clarification on IDP content. Provide clarification of contributions required and that infrastructure can be delivered and support the level of growth planned.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment		Yes	
Email	E.49	File B	Kent SME Network	SDLP 201	Esquire Developments	Developers or Agents	Support appropriate ness required. However modifications may be needed to reflect evidence. Further, we do not consider it proportionate or supported by evidence demonstrating need to require consideration on all sites for a mix including older persons housing and custom and self-build plots. These are unlikely to be appropriate on smaller sites. Custom and self-build requirements are considered separately under policy T9. This element should be removed, or if necessary, a unit-size threshold be applied (i.e. over 100 dwellings	6. Housing	6.2 Housing mix	Policy T2: Housing Mix & Paragraph 6.2.3	Amend paragraph 2 as follows: 'Residential development will only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types, including bungalows where appropriate, and sizes to address local requirements, as evidenced through the Medway Local Housing Needs Assessment, site-specific evidence or updated reports and studies.' Amend paragraph 4 as follows: 'Accommodation requirement as detailed in the latest housing need evidence Local Housing Need Assessment will be used to help inform which house sizes and mix should be delivered in key locations in urban and rural areas to meet the objectively assessed needs of Medway as detailed in the latest evidence. ' Amend paragraph 5 as follows: I" relation to affordable housing, the Council will require developers to provide details of how this evidence, or site-specific evidence, has been used to justify the proposed mix.' Amend paragraph 7 as follows: 'Development schemes must demonstrate that as part of the housing mix, sufficient consideration has been given to: * older persons housing need, (particularly for downsizing); * custom and self-build plots. The criteria outlined in policy T4 and T9 needs to be observed '	Yes	
Email	E.49	File B	Kent SME Network	SDLP 202	Esquire Developments	Developers or Agents	A clear map is needed within the Plan to identify these areas captured in the policy. Welcome, within policy T3, a 'delivery sequence' mechanism which would allow developers the ability to, where necessary, justify an alternative approach to tenure and/or delivery.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Add to policy in the 4th paragraph as follows: 'Delivery of affordable housing should be on site in the first instance. If this cannot be achieved, then an alternative approach will need to be robustly justified. The local context and demographics will be a key consideration. Where on site provision is demonstrated through evidence to be unviable or unattractive to recognised Registered Providers, the Council will permit developers to follow the identified delivery sequence.'	Yes	
Email	E.49	File B	Kent SME Network	SDLP 203	Esquire Developments	Developers or Agents	Support the inclusion of policy T11. Support the 60 dwelling threshold.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders		Yes	
Email	E.49	File B	Kent SME Network	SDLP 204	Esquire Developments	Developers or Agents	Clarify the obligations required. Require clarity on the 'vehicle trip credit' and inclusion in the IDP or remove this element of the policy. Need clarity on exemption due to accessible location.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	

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Email	E.49	File B	Kent SME Network	SDLP 205	Esquire Developments	Developers or Agents	Clarity on what constitutes 'significant amount of movement' When will this policy apply in relation to requirements which may differ from current validation list of requirements. Statement regarding sign off from National highways needs updating according to NPPF paragraph 116.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans	Statement regarding sign off from National highways needs updating according to NPPF paragraph 116.	Yes	
Email	E.67	File V	Kent Wildlife Trust	SDLP 273	N/A	Voluntary and Community Organisations	BNG, viability * Provide a higher biodiversity net gain requirement. * MC viability assessment shows more cost at 10% and increasing to 20% does not materially harm viability * Kent Nature Partnership report can be used to justify 20% - used by other authorities.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.67	File V	Kent Wildlife Trust	SDLP 274	N/A	Voluntary and Community Organisations	SA8: * Proposed housing on the Hoo Peninsula risks harming ecologically sensitive areas due to infrastructure, habitat loss, pollution, and disturbance. * While KWT supports mitigation within 6 km of designated sites, impacts beyond this zone and on non-designated areas remain unaddressed. * The effectiveness of the proposed strategic environmental management plan is uncertain, raising concerns about including these sites in the draft Local Plan	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.67	File V	Kent Wildlife Trust	SDLP 275	N/A	Voluntary and Community Organisations	SA7: Capstone Valley: * lack of detail on the criteria used to assess the suitability of developments on sites within or adjacent to sensitive ecological features (LW4/6/7/8 together with HW3/6/11 lead to isolation of ancient woodland and therefore habitat fragmentation) * green infrastructure corridor is noted but unclear whether corridor or design can cope with volume of development identified. * policy wording needs to clarify adherence to masterplan to ensure delivery of green corridor appropriately.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	* policy wording needs to clarify adherence to masterplan to ensure delivery of green corridor appropriately.		
Email	E.67	File V	Kent Wildlife Trust	SDLP 276	N/A	Voluntary and Community Organisations	Need ecological surveys and assessment of site connectivity to determine inclusion of brownfield or greenfield sites. Site allocations must include: * specific requirements to demonstrate mitigation hierarchy has been followed, particularly through masterplan design, green infrastructure creation and open space strategies * ensure extensive surveys are submitted at application HRA and SA do not provide sufficient reassurance that irreversible impacts from the volume of development proposed can be avoided regarding SA7, SA6, SA8. The SA does not make clear how the site selection has followed mitigation hierarchy.	14. Site Allocations					
Email	E.67	File V	Kent Wildlife Trust	SDLP 277	N/A	Voluntary and Community Organisations	SA6: * Development sites west of Strood (SNF1, SNF3, SR5) form key green infrastructure links between ecologically valuable areas. However, there is insufficient evidence that their ecological value—especially for declining farmland birds—has been properly assessed. * The proposed narrow green corridors are inadequate for wildlife needs. * While housing demand is acknowledged, releasing Green Belt land must be based on clear environmental value assessments and should enhance nature. * Current plans appear development-led, with green infrastructure as an afterthought. Detailed ecological	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1414	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1415	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1416	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1417	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1418	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			

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Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1419	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1420	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1421	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1422	N/A	Members of the Public	Concern about impacts to wildlife habitats	2. Vision and Strategic Objectives	2.1 Vision				
Hoo Peninsula Campaign (Additional responses)	H.12	File Q	Kevin Miller	SDLP 1423	N/A	Members of the Public	Infrastructure is not in place to support anticipate growth (e.g. healthcare services, retail)	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.107	File L	Kevin Price	SDLP 466	N/A	Members of the Public	Objection to the proposed reclassification and transfer of the land north of Beaufort Road and west of Rede Court Road, Strood, into Gravesham's jurisdiction and its potential downgrading from Green Belt to "Grey Belt" because of procedural deficiencies, importance of the site (Strategic gap, grade 1 agricultural land, habitat for wildlife) and NPPF compliance	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4893	Bloomfields (Ben Young)	Developers or Agents	Support inclusion of their site HHH41	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4895	Bloomfields (Ben Young)	Developers or Agents	Support the brownfield first approach.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.10			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4897	Bloomfields (Ben Young)	Developers or Agents	Promoting their site HHH41	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4898	Bloomfields (Ben Young)	Developers or Agents	Support the spatial development strategy	3. Spatial Development Strategy					
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4900	Bloomfields (Ben Young)	Developers or Agents	The intentions to provide new local services will support sustainability objectives and encourage walking, cycling and use of public transport while reducing private vehicle use.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4901	Bloomfields (Ben Young)	Developers or Agents	Hoo Development Framework is not a background document to help understand the wider strategy.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Provide early feedback relating to the Hoo Development Framework	Yes	To ensure that site HHH4Yes can be delivered without detriment and delay
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4904	Bloomfields (Ben Young)	Developers or Agents	While the policy's objectives are supported, concerns are raised about its blanket application to all sites, regardless of size. Smaller sites like HHH41 (25 units) should not be subject to the same master planning and infrastructure requirements as larger sites. The lack of clarity around the Hoo Development Framework (HDF) and its impact on smaller developers could delay delivery. The policy should distinguish between major and minor sites to ensure timely development.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	The policy should be redrafted to ensure it is clear what is required of the larger sites and what is required of the small sites within the policy itself. The policy should be drafted to ensure that the strategic aspirations of the policy and the Hoo Development Framework (HDF), should only be required of sites of 500 units or more. At the very least, it is important that this policy acknowledges that the smaller sites named within the policy itself are distinctly different to the larger, more strategic sites, and the aspirations for their quick delivery supported within the policy text itself. It is not clear within the policy whether smaller developers fall within this Hoo Consortium and if all sites in SA8 will be subject to the HDF aspirations. This should be confirmed at	Yes	To ensure that site HHH42 can be delivered at the earliest opportunity.
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4905	Bloomfields (Ben Young)	Developers or Agents	Policy T3 outlines affordable housing requirements, but does not adequately account for the higher costs of developing brownfield sites. While the policy allows for viability assessments, it risks applying unrealistic expectations to small brownfield sites like HHH41, which may face contamination and other challenges. The policy should better differentiate between site types and emphasize flexibility for viability, especially in high-value areas. The inclusion of viability assessment provisions is	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	The policy should place a higher emphasis on bullet point three, where hard to deliver brownfield sites may require significant viability work to facilitate their delivery. In these scenarios the lower threshold of Yes0 % may be difficult to achieve, even in higher value areas or in the countryside.	Yes	To ensure that the Local Plan provides a sound basis for site delivery.
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4906	Bloomfields (Ben Young)	Developers or Agents	careful consideration on design would need to be taken on sites which will currently mark a transition or are on the edge settlement, but which may in the future form part of a wider development	5. Built Environment	5.2 High Quality Design	Policy T1: High Quality Design and Amenity			
Online	698	Online (OPUS)	Kitesfield Estates Limited [698]	4907	Bloomfields (Ben Young)	Developers or Agents	Local Plan could be improved by including the Hoo Development Framework. Early delivery is based on viability in addition to obtaining financing	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.162	File H	Kitewood Estates Limited	SDLP 952	N/A	Developers or Agents	HW11 and SA7: Support Policy SA7 however, the site can accommodate 'at least' 60 dwellings, rather than 'up to' as the emerging Policy currently suggests. Furthermore, the site is capable of being delivered in Plan Period (years 1-5) and the reference to 'and 6-10' should be deleted.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Proposed changes: * reflect 'at least' 60 dwellings * Capable of being delivered in Plan Period (years 1-5) and the reference to 'and 6-10' should be deleted.		
Email	E.162	File H	Kitewood Estates Limited	SDLP 953	N/A	Developers or Agents	Support	3. Spatial Development Strategy					
Email	E.162	File H	Kitewood Estates Limited	SDLP 954	N/A	Developers or Agents	Reference to 'bungalows' is not justified nor is reference to downsizing.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix			
Email	E.162	File H	Kitewood Estates Limited	SDLP 955	N/A	Developers or Agents	* Local connection for affordable housing could be a deterrent for registered providers. Howe deliverable is it? * Paragraph 6.3.16 - does not relate to just SME's. The Council could help by adopting a flexible approach to the Affordable Housing tenure split on a site-specific basis, and this could be reflected within the supporting text.	6. Housing	6.3 Affordable housing	Paragraph 6.3.16			
Email	E.162	File H	Kitewood Estates Limited	SDLP 956	N/A	Developers or Agents	Criterion f: Provision of open space will be discussed at pre-app given site specific constraints, so may deviate from this.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Online	1638	Online (OPUS)	Kyndi Limited (Mr Rob Kennedy, Head of Sales & Business Development) (1638)	4913	N/A	Business	Suggested policy amendment for a requirement for all new residential developments to be technology compliant in order to improve quality of life of residents, assist the health service, future proof properties and align with national strategies for digital inclusion and smart living.	Regulation 19 Consultation		Paragraph 8 - Chapter 5	Suggested Policy Addition [DM5] : “All new residential developments must be designed to be technology compliant, including provision for digital connectivity, assistive technology integration, and adaptability for future care needs.”		
Email	E.193	File M	Laura Blair	SDLP 1285	N/A	Members of the Public	Object to Policy SA6's green-belt redesignation due to the following: - Lack of consultation, - No demonstrated exceptional circumstances, - Misclassifies productive farmland as "grey belt", - Ignores brownfield-first policy, and risks merging settlements. - Infrastructure, environmental and health evidence is inadequate. Suggestion to suspend SA6, complete robust evidence base and independent studies, put in place infrastructure guarantees and organise a new public consultation before	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.87	File L	Lesley Harrison	SDLP 313	N/A	Members of the Public	* Concerns centred around Medway's infrastructure, especially water supply. * Concern over current hosepipe bans and sewage issues	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management			
Email	E.87	File L	Lesley Harrison	SDLP 314	N/A	Members of the Public	Concern about the lack of investment and plan's feasibility and subsequent burden placed on residents to fund infrastructure improvements linked to proposed developments.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.183	File M	Lianne Brockwell	SDLP 1168	N/A	Members of the Public	Fear that housing plans will worsen overstretched services. Questions affordability of housing, social housing allocation, and lack of local support.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.130	File L	Linda & Antonio Riordan	SDLP 727	N/A	Members of the Public	Objection to development near Brompton Farm Road due to concerns about increased traffic, noise and pollution and its impact on health. Query plans for increased infrastructure to support homes (GP's, Healthcare practices).	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.130	File L	Linda & Antonio Riordan	SDLP 728	N/A	Members of the Public	Concern over loss of wildlife habitats and loss of nature walks that will impact on residents wellbeing.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1731	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1732	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1733	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1734	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				

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Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1735	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1736	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1737	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.45	File Q	Linda & Shaun Soules	SDLP 1738	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hard copy	H.5	File N	Linda Atkinson	SDLP 1373	N/A	Members of the Public	It threatens environmental destruction, relies on invalid evidence, and neglects urban housing opportunities.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hard copy	H.5	File N	Linda Atkinson	SDLP 1374	N/A	Members of the Public	Key allocations like High Halstow are isolated, costly, and undeliverable, placing strain on services and undermining NPPF compliance	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow			
Hard copy	H.5	File N	Linda Atkinson	SDLP 1375	N/A	Members of the Public	The plan is unsound, promoting high-risk, unsustainable development on the Hoo Peninsula without confirmed infrastructure funding.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1805	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1806	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1807	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1808	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1809	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1810	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1811	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.54	File Q	Lisa Choppen	SDLP 1812	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.88	File L	Louise Hubbard	SDLP 315	N/A	Members of the Public	Object to policy SA6 and S7 Concern over reclassifying Greenbelt land in Strood as Grey belt under policies SA6 and S7. The land is scenic, agricultural, and used for walking. Concern over contradictions to government definitions. Only parcels 2–4 are affected, raising questions about fairness and transparency in the Local Plan	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.128	File L	Louise Putnam	SDLP 712	N/A	Members of the Public	Plan fails DTC, with insufficient evidence submitted by Medway Council. Medway Council has failed compliance with Reg 18 and 19 requirements with no extension granted to consultation period. Plans policies do not align with NPPF including sustainable development	1. Overview	1.4 Duty to Cooperate				
Email	E.128	File L	Louise Putnam	SDLP 713	N/A	Members of the Public	Lack of evidence for infrastructure delivery and monitoring and IDP is vague and legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.128	File L	Louise Putnam	SDLP 714	N/A	Members of the Public	Concerned that many brownfield sites have been ignored and favours greenfield development. The number of homes proposed is unsustainable.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.128	File L	Louise Putnam	SDLP 715	N/A	Members of the Public	Insufficient integration of SEA and HRA.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			

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Email	E.128	File L	Louise Putnam	SDLP 716	N/A	Members of the Public	No evidence of the 400 metre buffer zones in areas that border protected sites such as SSSI's and RAMSAR site.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.128	File L	Louise Putnam	SDLP 717	N/A	Members of the Public	Lack of evidence for infrastructure delivery and monitoring and the IDP is vague and legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.14	File L	Lyn Wiles	SDLP 36	N/A	Members of the Public	Queries building of homes in greenbelt Capstone.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Email	E.14	File L	Lyn Wiles	SDLP 37	N/A	Members of the Public	Queries the availability of realistic and quality affordable housing for Medway residents.	6. Housing	6.3 Affordable housing				
Email	E.14	File L	Lyn Wiles	SDLP 38	N/A	Members of the Public	Queries lack of opportunities for older residents to downsize	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation				
Email	E.14	File L	Lyn Wiles	SDLP 39	N/A	Members of the Public	Concerns over anti-social behaviour.	10. Health, communities and Infrastructure	10.2 Health and wellbeing				
Email	E.14	File L	Lyn Wiles	SDLP 40	N/A	Members of the Public	Queries infrastructure capacity (with increased home building).	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1781	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1782	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1783	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1784	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1785	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1786	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1787	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.51	File Q	Lynda Collins	SDLP 1788	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.196	File M	Lynn Wilson	SDLP 1288	N/A	Members of the Public	Concern over healthcare strains and urges prioritisation of sustainability, food security, and community well-being before altering land designations or expanding residential zones.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.196	File M	Lynn Wilson	SDLP 1289	N/A	Members of the Public	Object over environmental concerns. Key issues include loss of farmland, increased pollution, wildlife disruption, and pipeline risks	4. Natural Environment					
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1450	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1451	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1452	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1453	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1454	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1455	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			

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Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1456	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.16	File Q	M Shuter	SDLP 1457	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1650	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1651	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1652	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1653	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1654	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1655	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1656	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1657	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Hoo Peninsula Campaign (Additional responses)	H.36	File Q	M T Dennison	SDLP 1658	N/A	Members of the Public	The draft Local Plan neglects infrastructure, emergency services, and utility needs on the Hoo Peninsula. It misrepresents community assets, ignores traffic and pollution concerns, and proposes relocating businesses, worsening strain	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1551	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1552	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1553	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1554	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1555	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1556	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1557	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1558	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1559	N/A	Members of the Public	Redeveloping Chatham Docks risks job losses and erodes Medway's heritage.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1560	N/A	Members of the Public	Green Belt loss near Strood threatens biodiversity and wellbeing.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			

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Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1561	N/A	Members of the Public	Infrastructure is overstretched, with no clear funding for services	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1562	N/A	Members of the Public	Proposed growth would worsen strain, reducing residents' quality of life	10. Health, communities and Infrastructure	10.2 Health and wellbeing				
Hoo Peninsula Campaign (Additional responses)	H.27	File Q	M Wellard	SDLP 1563	N/A	Members of the Public	Concerned to see agriculture and wildlife habitats destroyed for housing	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.55	File L	Maggie Antoniou	SDLP 231	N/A	Members of the Public	Concern raised over development in Green belt / Grey belt, lack of alignment with Gravesham Borough Council's Green Belt Policy.	4. Natural Environment	4.12 Green Belt	Paragraphs 4.12.3 and 4.12.4		No	
Email	E.55	File L	Maggie Antoniou	SDLP 232	N/A	Members of the Public	Concern over air pollution from cars and impact on health	4. Natural Environment	4.10 Air quality			No	
Email	E.55	File L	Maggie Antoniou	SDLP 233	N/A	Members of the Public	Concern over loss of agricultural land, wildlife impact and inadequate infrastructure, particularly on the road network and traffic congestion. Lack of traffic management impact survey.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.153	File U	Maidstone Borough Council	SDLP 869	N/A	Statutory Bodies	MBC is unsure what are non-strategic policies and the status of the thematic policies (if they are strategic or non-strategic) as required by the NPPE.	1. Overview	1.3 How the plan has been prepared		Yes set out what are strategic and non-strategic policies as a list.		
Email	E.153	File U	Maidstone Borough Council	SDLP 870	N/A	Statutory Bodies	Policy S2: Conservation and Enhancement of the Natural Environment states that 10% biodiversity net gain (BNG) will be required by Medway Council. A figure of 20% will mirror the position in Maidstone Borough. Further, the Kent Nature Partnership promotes the adoption of 20% BNG target for the county's planning authorities.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Yes please raise the BNG figure to 20%	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 871	N/A	Statutory Bodies	Securing Strong Green and Blue Infrastructure- MBC would like to see reference to the incorporation of integral nesting niches within the built environment, such as bird and bat bricks.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Reference to the incorporation of integral nesting niches within the built environment, such as bird and bat bricks.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 872	N/A	Statutory Bodies	Recommend stronger and more explicit linkage between Green & Blue Infrastructure, BNG and flood risk management.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure & supporting text	Recommend stronger and more explicit linkage between Green & Blue Infrastructure, BNG and flood risk management.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 873	N/A	Statutory Bodies	MBC would like to see reference to prioritising 'wet SuDs' to maximise positive ecological and landscape impact from use of this technology.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Reference to prioritising 'wet SuDs' to maximise positive ecological and landscape impact from use of this technology.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 874	N/A	Statutory Bodies	MBC is supportive of the proposed development strategy in as far as it provides for meeting the full housing needs of Medway and does not require MBC to meet any unmet needs.	6. Housing	6.1 Introduction	Paragraph 6.1.2		No	
Email	E.153	File U	Maidstone Borough Council	SDLP 875	N/A	Statutory Bodies	Unclear what an 'over concentration' of HMOs would be? How is this to be determined? How is 'excessive parking demands' assessed?	6. Housing	6.8 Houses of multiple occupation	Policy T8: Houses of Multiple Occupation	Unclear what an 'over concentration' of HMOs would be? How is this to be determined? How is 'excessive parking demands' assessed? Please define	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 876	N/A	Statutory Bodies	There appear to be no proposed site allocations to meet the identified needs of the Gypsy, Traveller and Travelling Showpeople households in the district. It is unclear how the LPA intend demonstrate a deliverable 5-year supply of sites upon adoption. Is it all through windfall?	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople	Please define the supply position and how sites are to be delivered in Policy T10.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 877	N/A	Statutory Bodies	Small typo – extra 'r' before 'respects'	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders (bullet 2)	Small typo – extra 'r' before 'respects'.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 878	N/A	Statutory Bodies	Policy does not set out quantum of employment land to be provided and suggests that the employment needs assessment is yet to be published. The plan in relation to meeting employment land needs is therefore not positively prepared as it is unknown whether Medway can meet its needs, or if it will turn to neighbouring authorities to help meet any unmet needs under the duty to cooperate. However, policy S11 supporting text (para 7.4.1) then suggests the employment land needs assessment is complete and identifies the need for 52.8ha of land. The status of the employment needs assessment should be clarified.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Define the employment requirement	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 879	N/A	Statutory Bodies	This chapter does not safeguard land for North Dane Way access or M2 junction improvement works.	9. Transport			Add a safeguarding area to M2 Junction 4 improvement works and the Dane Way connection of a new East West link road.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 880	N/A	Statutory Bodies	Figure 13 needs to be updated to reflect latest masterplan changes. Lidsing Garden Community should be the title of the development in Maidstone as per the Maidstone Local Plan Review Policy I PSP4(b).	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Fig 13 updated to reflect latest masterplan changes. Lidsing Garden Community should be the title of the development in Maidstone	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 881	N/A	Statutory Bodies	The key for the policies map suggested that there are safeguarded areas for transport scheme M2 junction 4 improvement works have not been included in this section.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South East	Add a safeguarding area for M2 junction 4.	No	
Email	E.153	File U	Maidstone Borough Council	SDLP 882	N/A	Statutory Bodies	Hempstead Valley Shopping Centre is not listed as a District Centre although listed in Policy S16	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South East	Add Hempstead Valley to the Policies Map		

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Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1827	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1828	N/A	Members of the Public	Concern over proposed housing increases traffic overloads inadequate infrastructure—roads, public transport, doctors, schools need urgent expansion.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1829	N/A	Members of the Public	Concern over proposed housing increases traffic overloads inadequate infrastructure—roads, public transport, doctors, schools need urgent expansion.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1830	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1831	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1832	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1833	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1834	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1835	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1836	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1837	N/A	Members of the Public	Prioritize brownfield sites to protect Hoo Peninsula's habitats and retain local affordability	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1838	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1839	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1840	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1841	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1842	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1843	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1844	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	2. Vision and Strategic Objectives	2.1 Vision				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1845	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment inadequate.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1846	N/A	Members of the Public	Single-lane routes risk gridlock.	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.57	File Q	Marie Calvert	SDLP 1847	N/A	Members of the Public	Prioritize brownfield sites to protect Hoo Peninsula's habitats and retain local affordability.	3. Spatial Development Strategy	3.1 Overview		13/08/2025 08:23:00 (Catherine Smith)		

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Online	1661	Online (OPUS)	Marie hurkett [1661]	4981	N/A	Members of the Public	Concern over road network capacity on Hoo Peninsula with growth planned.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Figure 14: Hoo St Werburgh and Chattenden Concept Plan	Don't put that many extra houses on the peninsula. Or fix the problem.. How about a bridge over the Medway into town? I doubt that would be considered, yet you are willing to increase the traffic without a real solution	No	
Email	E.99	File L	Marilyn Hawkes	SDLP 339	N/A	Members of the Public	Objects to policy SA6 Concern over reclassification of Green Belt land, environmental degradation, and worsening air quality.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.99	File L	Marilyn Hawkes	SDLP 340	N/A	Members of the Public	Concerned about safety risks from a fuel pipeline	9. Transport					
Email	E.99	File L	Marilyn Hawkes	SDLP 341	N/A	Members of the Public	Concern over housing distribution between Gravesham and Medway further undermine the plan's credibility, raising serious questions about sustainability, equity, and long-term community impact	6. Housing					
Email	E.99	File L	Marilyn Hawkes	SDLP 342	N/A	Members of the Public	Objects to policy SA6 Concern over reclassification of Green Belt land, environmental degradation, and worsening air quality.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.99	File L	Marilyn Hawkes	SDLP 343	N/A	Members of the Public	Concern over lack of infrastructure for new housing, particularly flood defence, sewage blockage, GPs, hospitals and school places	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1668	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1669	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1670	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1671	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1672	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1673	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1674	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1675	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1676	N/A	Members of the Public	Concerned about unsustainable housing growth on the Hoo Peninsula due to withdrawn infrastructure funding.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Hoo Peninsula Campaign (Additional responses)	H.38	File Q	Marilyn Stone	SDLP 1677	N/A	Members of the Public	Urges inclusion of Future Home Standards 2025 in Medway's Local Plan to ensure sound planning.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.131	File L	Mark Batchelor	SDLP 729	N/A	Members of the Public	Objects to plan due to green belt development and NPPF policies not being followed(NPPF PARA 134, 110, 115) No evidence to justify release of Greenbelt	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.203	File M	Martin Potter	SDLP 1310	N/A	Members of the Public	The draft Local Plan proposes development in already crowded suburban areas like East Rainham and West Strood, risking green spaces and rural heritage. Need for improved quality of life and urban regeneration in Chatham, Gillingham, and Strood. The plan should be revised to prevent further strain on local residents and protect community assets	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			

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Email	E.115	File R	Medway Conservative Group	SDLP 486	N/A	MPs, Members and Parish Councils	The group sees infrastructure as central to the plan's success but criticises the lack of clarity on funding and delivery. They argue the plan relies too heavily on S106 and lacks evidence of utility and health service capacity.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery	With an ongoing GP crisis and a hospital with aging infrastructure in need of a long-term plan, it is important that we see provision in the Local Plan for a new hospital on a new, accessible site. This is an urgent issue that needs to be addressed for the benefit of Medway residents of today and the future brought about by an increase in housing, not to mention those affected by Maidstone and Gravesham local plans, as well as Swale, who consider Medway Maritime Hospital to be their "local" hospital. New residents on the immediate borders will no doubt look to Medway to provide major services including health care. If the GP is not available, Medway Hospital is the next port of call by residents leading to longer waits and queues for ailments normally dealt with by GPs. Staff at Medway Hospital do their utmost to look after all comers – They do a wonderful job despite being overloaded. A new hospital will undoubtedly attract new doctors and support staff.	Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address the EIP on this.
Email	E.115	File R	Medway Conservative Group	SDLP 487	N/A	MPs, Members and Parish Councils	*Active lifestyles are personal choices, but planning should support them. *The Local Plan is too rigid, limiting creative, appealing development. *A mix of housing types helps retain residents locally. *Private gardens are better than large open spaces prone to misuse. *Acute and primary care services are overstretched and not prepared for population growth. *Social care needs are rising but under-addressed, especially staffing and funding. *Sustainable transport goals are unrealistic without major investment. *Leisure spaces are welcome, but upkeep costs are ignored. *Takeaway deliveries harm health and increase traffic; many workers may be ineligible. *A freeze on new takeaways and focus on dine-in venues is supported. *Oppose restrictions on out-of-town retail expansion due to economic impact.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	With an ongoing GP crisis and a hospital with aging infrastructure in need of a long-term plan, it is important that we see provision in the Local Plan for a new hospital on a new, accessible site. This is an urgent issue that needs to be addressed for the benefit of Medway residents of today and the future brought about by an increase in housing, not to mention those affected by Maidstone and Gravesham local plans, as well as Swale, who consider Medway Maritime Hospital to be their "local" hospital. New residents on the immediate borders will no doubt look to Medway to provide major services including health care. If the GP is not available, Medway Hospital is the next port of call by residents leading to longer waits and queues for ailments normally dealt with by GPs. Staff at Medway Hospital do their utmost to look after all comers – They do a wonderful job despite being overloaded. A new hospital will undoubtedly attract new doctors and support staff.	Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address the EIP on this.
Email	E.115	File R	Medway Conservative Group	SDLP 488	N/A	MPs, Members and Parish Councils	Support development on green space only if it is replaced and not ecologically sensitive. A suitable test could be created to address these concerns- Capstone Valley is cited as failing this test. They stress the importance of maintaining sports facilities and criticise budget cuts affecting green space upkeep.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces		Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address
Email	E.115	File R	Medway Conservative Group	SDLP 489	N/A	MPs, Members and Parish Councils	The group calls for balance between open and private space and suggests the Council should provide allotments rather than developers. They express concern over the adequacy of S106 funding and question who will maintain new open spaces.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces		Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address

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Email	E.115	File R	Medway Conservative Group	SDLP 490	N/A	MPs, Members and Parish Councils	They argue the plan lacks consideration of impacts on existing communities and criticise the Council's own actions, such as leasing Hempstead Library. They support multifunctional schools and health centres and advocate for community hubs to reduce travel and increase footfall.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	With an ongoing GP crisis and a hospital with aging infrastructure in need of a long-term plan, it is important that we see provision in the Local Plan for a new hospital on a new, accessible site. This is an urgent issue that needs to be addressed for the benefit of Medway residents of today and the future brought about by an increase in housing, not to mention those affected by Maidstone and Gravesham local plans, as well as Swale, who consider Medway Maritime Hospital to be their "local" hospital. New residents on the immediate borders will no doubt look to Medway to provide major services including health care. If the GP is not available, Medway Hospital is the next port of call by residents leading to longer waits and queues for ailments normally dealt with by GPs. Staff at Medway Hospital do their utmost to look after all comers – They do a wonderful job despite being overloaded. A new hospital will undoubtedly attract new doctors and support staff.	Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address the EIP on this.
Email	E.115	File R	Medway Conservative Group	SDLP 491	N/A	MPs, Members and Parish Councils	They note good fibre broadband coverage but poor mobile data service, especially near the M2. They urge better connectivity to support enforcement and transport systems.	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications		Yes	We would like to outline specifically the needs case for a new hospital and how the lack of a site within the local plan harms the community and fails to deliver for Medway residents. Our Shadow Cabinet Member for Health would be happy to address
Email	E.115	File R	Medway Conservative Group	SDLP 492	N/A	MPs, Members and Parish Councils	The Strategic Transport Assessment appears to focus on plans granted rather than proposals in the plan. Concerns are raised about traffic impacts from developments like Capstone Valley and Lidsing Village. They argue that road infrastructure is inadequate and public transport is insufficient, especially for employment hubs like BAE Systems.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 493	N/A	MPs, Members and Parish Councils	They support improvements but see limited utility beyond leisure and do not think that any reference to a new crossing has any chance of obtaining funding.	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 494	N/A	MPs, Members and Parish Councils	They support the transport opportunity but suggest alternative land uses if the scheme doesn't progress by 2041.	9. Transport	9.3 Active travel interventions	Policy DM16: Chatham Waters line		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 495	N/A	MPs, Members and Parish Councils	They question the viability of reopening the rail line given scaled-back housing plans for the Hoo Peninsula.	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 496	N/A	MPs, Members and Parish Councils	They support marina development for employment and leisure, citing a national shortage of berths and Medway's skilled workforce.	9. Transport	9.6 Marinas and moorings	Policy T22: Marinas and moorings		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 497	N/A	MPs, Members and Parish Councils	They support the concept but call for flexibility and better parking provision. They stress the need for bus access in large developments.	9. Transport	9.9 User hierarchy and street design	Policy T25: User hierarchy and street design		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.

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Email	E.115	File R	Medway Conservative Group	SDLP 498	N/A	MPs, Members and Parish Councils	They reject the 15-minute city concept as unrealistic for Medway's geography and commuting patterns. They highlight poor public transport and lack of investment in rail stations.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 499	N/A	MPs, Members and Parish Councils	They criticise reliance on outdated data and S106 funding, urging updated traffic and transport analysis.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 500	N/A	MPs, Members and Parish Councils	They argue current standards are outdated and inadequate for modern households. They call for two parking spaces per dwelling, ample visitor parking and better parking provision at travel hubs.	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 501	N/A	MPs, Members and Parish Councils	They support cycle facilities but question long-term maintenance and oppose inclusion of e-scooters due to legal uncertainty.	9. Transport	9.12 Parking	Policy DM20: Cycle Parking and storage		Yes	As laid out above, we feel wider discussion around transport is at the heart of the local plan process.
Email	E.115	File R	Medway Conservative Group	SDLP 502	N/A	MPs, Members and Parish Councils	They oppose the scale of development, citing recent housing growth, lack of infrastructure, and inadequate transport access. They question water and wastewater capacity and criticise reliance on S106 and vague infrastructure plans.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	We propose the removal of the site allocation SA10 to make this sound.	Yes	Laid out Above
Email	E.115	File R	Medway Conservative Group	SDLP 503	N/A	MPs, Members and Parish Councils	*The draft Regulation 19 plan prioritises greenbelt and green field sites early (years 1–5), with brownfield sites pushed to later stages (years 6–10). This contradicts the National Planning Policy Framework (NPPF), which encourages brownfield development first. *Heavy emphasis on Kingsnorth Power Station and Grain Business Park for development. These sites are remote from urban centres, making them less viable for active use - conflicting with NPPF Regulation 86. *Proposal to convert riverside business areas to housing threatens specialised river-dependent industries. This goes against NPPF Paragraphs 85–87, which protect such uses. *The land near Medway Towns could support modern business needs. However, no evidence of engagement with boundary authorities like the MOD, breaching NPPF Paragraphs 24–28.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	1. Brownfield sites in the urban areas, should be in the first period of the plan (1-5 years) as all required infrastructure i.e.. roads, drainage, water, electrics, gas and broadband will already be in place in the built up area of brown field sites. 2. The scale of 10% of affordable housing in brown field sites is extremely low when dealing with high density housing with all services available. 3. This should be increased to 30% of affordable housing which would provide more social renting, affordable renting, shared ownership in the urban areas. 4. In green field sites and greenbelt, the affordable housing should be reduced to 10% as the cost of providing the services i.e. capital investment for roads, electric, gas, sewerage water etc, has to be included within the unit cost which is much higher and takes more time to obtain and develop these sites. These sites need to reflect the problems and places in the latter part of the plan (6-10, 11-15 plan period). 5. Up to 7500 homes are to be built in the plan period on the Hoo Peninsula which need to feed through the existing Four Elms Junction and roundabout which is already at capacity, so without large capital investment this targeted development on the Peninsula will overwhelm the road network on this side of the Medway Towns. 6. As an alternative to housing, on the West Side of Strood North, in land being redesignated as grey belt, a suitable portion of the land	Yes	As Above

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.115	File R	Medway Conservative Group	SDLP 504	N/A	MPs, Members and Parish Councils	*The administration previously campaigned to preserve Capstone Valley as vital green space for surrounding villages and Chatham. *Plan proposes ~3,000 new homes on agricultural land that acts as a buffer to the Area of Outstanding Natural Beauty (AONB). *Loss of productive farmland and negative impact on the rural economy. *Contradiction with policies T14 and T27. *Damage to natural habitats. *Overlooking adjacent development in Lidsing Village (Maidstone) with 2,500 homes. *Insufficient road infrastructure, affecting Hempstead, Sharsted Way, Hoath Way, and M2 Junction 4. *Loss of irreplaceable open space (T28). *Over-reliance on S106 funding, which is unlikely to cover necessary infrastructure.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	1. Brownfield sites in the urban areas, should be in the first period of the plan (1-5 years) as all required infrastructure i.e.. roads, drainage, water, electrics, gas and broadband will already be in place in the built up area of brown field sites. 2. The scale of 10% of affordable housing in brown field sites is extremely low when dealing with high density housing with all services available. 3. This should be increased to 30% of affordable housing which would provide more social renting, affordable renting, shared ownership in the urban areas. 4. In green field sites and greenbelt, the affordable housing should be reduced to 10% as the cost of providing the services i.e. capital investment for roads, electric, gas, sewerage water etc, has to be included within the unit cost which is much higher and takes more time to obtain and develop these sites. These sites need to reflect the problems and places in the latter part of the plan (6-10, 11-15 plan period). 5. Up to 7500 homes are to be built in the plan period on the Hoo Peninsula which need to feed through the existing Four Elms Junction and roundabout which is already at capacity, so without large capital investment this targeted development on the Peninsula will overwhelm the road network on this side of the Medway Towns. 6. As an alternative to housing, on the West Side of Strood North, in land being redesignated as grey belt, a suitable portion of the land		
Email	E.115	File R	Medway Conservative Group	SDLP 505	N/A	MPs, Members and Parish Councils	We are supportive of the creation of attractive spaces that encourage access for primarily leisure uses but the Local Plan does not address the cost of up-keep of these spaces.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play				
Email	E.115	File R	Medway Conservative Group	SDLP 506	N/A	MPs, Members and Parish Councils	They raise concerns about school catchment overlap and traffic congestion, particularly at Four Elms roundabout.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	1. Brownfield sites in the urban areas, should be in the first period of the plan (1-5 years) as all required infrastructure i.e.. roads, drainage, water, electrics, gas and broadband will already be in place in the built up area of brown field sites. 2. The scale of 10% of affordable housing in brown field sites is extremely low when dealing with high density housing with all services available. 3. This should be increased to 30% of affordable housing which would provide more social renting, affordable renting, shared ownership in the urban areas. 4. In green field sites and greenbelt, the affordable housing should be reduced to 10% as the cost of providing the services i.e. capital investment for roads, electric, gas, sewerage water etc, has to be included within the unit cost which is much higher and takes more time to obtain and develop these sites. These sites need to reflect the problems and places in the latter part of the plan (6-10, 11-15 plan period). 5. Up to 7500 homes are to be built in the plan period on the Hoo Peninsula which need to feed through the existing Four Elms Junction and roundabout which is already at capacity, so without large capital investment this targeted development on the Peninsula will overwhelm the road network on this side of the Medway Towns. 6. As an alternative to housing, on the West Side of Strood North, in land being redesignated as grey belt, a suitable portion of the land		

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Email	E.115	File R	Medway Conservative Group	SDLP 507	N/A	MPs, Members and Parish Councils	Although sufficient schools are included within the local plan, these are being proposed as part of the development, presumably within S.106 contributions from the developers. However the proposed locations for three of the secondary schools, will force traveling from distance, with at least two of the school locations having poor transport links with no notification of necessary provision of public transport. Specific references to SA6, SA7, SA8, SA10.	14. Site Allocations		Site Allocations 1-12	1. Brownfield sites in the urban areas, should be in the first period of the plan (1-5 years) as all required infrastructure i.e.. roads, drainage, water, electrics, gas and broadband will already be in place in the built up area of brown field sites. 2. The scale of 10% of affordable housing in brown field sites is extremely low when dealing with high density housing with all services available. 3. This should be increased to 30% of affordable housing which would provide more social renting, affordable renting, shared ownership in the urban areas. 4. In green field sites and greenbelt, the affordable housing should be reduced to 10% as the cost of providing the services i.e. capital investment for roads, electric, gas, sewerage water etc, has to be included within the unit cost which is much higher and takes more time to obtain and develop these sites. These sites need to reflect the problems and places in the latter part of the plan (6-10, 11-15 plan period). 5. Up to 7500 homes are to be built in the plan period on the Hoo Peninsula which need to feed through the existing Four Elms Junction and roundabout which is already at capacity, so without large capital investment this targeted development on the Peninsula will overwhelm the road network on this side of the Medway Towns. 6. As an alternative to housing, on the West Side of Strood North, in land being redesignated as grey belt, a suitable portion of the land	Yes	As Above
Email	E.115	File R	Medway Conservative Group	SDLP 508	N/A	MPs, Members and Parish Councils	7.1.12 is outdated; unemployment in Medway has risen by 10% since July 2024.	7. Economic Development	7.1 Introduction				
Email	E.115	File R	Medway Conservative Group	SDLP 509	N/A	MPs, Members and Parish Councils	*Private sector investment lacking- no major private investment in the past 5 years; office spaces are being converted to housing. *Public sector investment noted, university expansion and a new health centre proposed. * Wind farm development on Hoo Peninsula threatens bird habitats. * Redefining industrial land for housing contradicts policy goals. * No evidence of energy provision plans for new businesses. *Limiting development in certain retail areas may hinder	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Email	E.115	File R	Medway Conservative Group	SDLP 510	N/A	MPs, Members and Parish Councils	*Advocates flexibility in use changes. *Quality-of-life test suggested for housing on industrial land. *Opposition to Chatham Docks housing due to job loss and overcrowding.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision			
Email	E.115	File R	Medway Conservative Group	SDLP 511	N/A	MPs, Members and Parish Councils	*Advocates flexibility in use changes. *Quality-of-life test suggested for housing on industrial land. *Opposition to Chatham Docks housing due to job loss and overcrowding.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Email	E.115	File R	Medway Conservative Group	SDLP 512	N/A	MPs, Members and Parish Councils	*Infrastructure deficiency: no clear plan for utilities, transport, or infrastructure to support 240,000 sqm of new employment space. *Vacant properties: existing empty offices and warehouses remain unused. *Kingsnorth expansion: requires major road investment, which is not addressed. *Loss of employment land: redevelopment of sites like Chatham Docks risks significant job losses	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites			
Email	E.115	File R	Medway Conservative Group	SDLP 513	N/A	MPs, Members and Parish Councils	Agreement with policy direction. Flexibility needed- emphasis on employer-led training and apprenticeships. Digital focus questioned, over-reliance may not suit Medway's traditional economy. Educational outcomes - need improvement to meet national standards	7. Economic Development	7.5 Learning and skills development	Policy T12: Learning and skills development			
Email	E.115	File R	Medway Conservative Group	SDLP 514	N/A	MPs, Members and Parish Councils	Support for cultural expansion, especially heritage and tourism. Need for more high-quality hotels. Encouragement for investor-led development. Poor infrastructure and M2 delays hinder tourism. River Medway potential- untapped opportunities for wildlife and marina tourism. Arena proposal ignored- no mention of Peel Waters' outdoor arena plan	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Policy T13: Tourism, culture and visitor accommodation			
Email	E.115	File R	Medway Conservative Group	SDLP 515	N/A	MPs, Members and Parish Councils	*Historic centres: support for preserving recognisable historic areas. *Town centre challenges: some centres are unattractive and fail to draw the right demographic. *Planning flexibility: avoid rigid rules; focus on public space investment and crime reduction to attract investment.	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries			

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Email	E.115	File R	Medway Conservative Group	SDLP 516	N/A	MPs, Members and Parish Councils	Threats to farming- tax changes and national policies harming small farms. Hospitality struggles -rising costs and taxes. Concerns over loss of agricultural land. Revitalisation ideas- reuse empty buildings, seasonal farmers markets, and food sector collaboration	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Email	E.115	File R	Medway Conservative Group	SDLP 517	N/A	MPs, Members and Parish Councils	*No indication of funding sources (government, council, or private sector). *Overprotection of town centres - has limited alternative development and economic growth. *Public transport reliance, assumes residents will use it without evidence of investment or demand. *Retail decline *Tax policy discouraging hospitality and footfall. *Shrink retail zones to a core area and repurpose excess	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy			
Email	E.115	File R	Medway Conservative Group	SDLP 518	N/A	MPs, Members and Parish Councils	*Market-led growth- centres should grow or shrink based on actual use. * Avoid rigid planning to support economic development. *New centres should be integrated into large developments with schools and health facilities	8. Retail and Town Centres	8.3 Hierarchy of centres	Policy S16: Hierarchy of centres			
Email	E.115	File R	Medway Conservative Group	SDLP 519	N/A	MPs, Members and Parish Councils	Restrictions limiting district retail development to protect town centres may hinder wider economic growth.	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment			
Email	E.115	File R	Medway Conservative Group	SDLP 520	N/A	MPs, Members and Parish Councils	*Despite housing and bus station upgrades, retail and leisure have declined. *Health centre potential may increase footfall but uncertain impact on retail. *Pentagon Centre issues - poor parking, unattractive environment, and deprivation. *Consider redevelopment like Lewisham to boost leisure and nighttime economy. Intra district could attract investment if development is appealing. *Poor public transport links to Dockyard; most visitors use cars. Reduce retail footprint, increase housing, and	8. Retail and Town Centres	8.7 Chatham town centre	Policy S17: Chatham town centre			
Email	E.115	File R	Medway Conservative Group	SDLP 521	N/A	MPs, Members and Parish Councils	Regeneration doubts - no credible plan; planning restrictions are a barrier. Developer-led approach recommended with clear design and environmental standards	8. Retail and Town Centres	8.9 Gillingham district centre	Policy S19: Gillingham district centre			
Email	E.115	File R	Medway Conservative Group	SDLP 522	N/A	MPs, Members and Parish Councils	Farmers market potential: High footfall makes Strood suitable. Regeneration challenges - old town hall site and nearby deprivation hinder progress.	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre			
Email	E.115	File R	Medway Conservative Group	SDLP 523	N/A	MPs, Members and Parish Councils	Investment needed, improve appearance and reduce parking charges to boost visits. Rail station plans not reflected in the Local Plan as well as ongoing work with Rainham Reimagined	8. Retail and Town Centres	8.11 Rainham district centre	Policy S21: Rainham district centre			
Email	E.115	File R	Medway Conservative Group	SDLP 524	N/A	MPs, Members and Parish Councils	Retail expansion supported, needed for growing population. Traffic concerns - Hoo Village may not be sustainable; larger site in east Hoo preferred. Bus route changes, suggested to serve more residents.	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula			
Email	E.115	File R	Medway Conservative Group	SDLP 525	N/A	MPs, Members and Parish Councils	Disagreement with classification - considered more than a local centre; key out-of-town shopping hub. Expansion potential could create jobs and attract investment. Road improvements needed, access issues due to M2 traffic. Planning restrictions: T15 and T17 seen as barriers to economic growth	8. Retail and Town Centres	8.13 Hempstead Valley district centre	Policy S23: Hempstead Valley district centre			
Email	E.115	File R	Medway Conservative Group	SDLP 526	N/A	MPs, Members and Parish Councils	Development should not be limited to protect town centres.	8. Retail and Town Centres	8.17 Medway Valley Leisure Park	Policy DM13 Medway Valley Leisure Park			
Email	E.115	File R	Medway Conservative Group	SDLP 527	N/A	MPs, Members and Parish Councils	Development should not be limited to protect town centres. Vacant units could be used to create jobs if planning policies T15 and T17 are relaxed.	8. Retail and Town Centres	8.18 Dockside	Policy DM14: Dockside			
Email	E.104	File R	Medway Liberal Democrats	SDLP 356	N/A	MPs, Members and Parish Councils	Policy S24: * Accepted: Paragraph 2, subsections ss 1–ss 3 and new inserted ss 4. * Concern about phased onsite infrastructure: Former ss 4 (now ss 5) item b allows phased onsite delivery that may be finished only after full occupation; this must not be permitted because developers have left essential infrastructure incomplete. * Support and improvement to former ss 4 (now ss 5): item a supported; item c accepted but should explicitly allow use of sequestration orders or Community Infrastructure Levy (CIL) to ensure infrastructure is delivered before full occupation. * Paragraph 3 and its sub-section policies are rejected. * Editorial issue: Remaining policy paragraphs are accepted but the final paragraph requires rewriting for coherence and	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery	Address concern about phased onsite infrastructure. (now ss 5) item c should explicitly allow use of sequestration orders or Community Infrastructure Levy (CIL) to ensure infrastructure is delivered before full occupation. The final paragraph requires rewriting for coherence and clarity.	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 357	N/A	MPs, Members and Parish Councils	It remains our view that the land northside of Basin 3 in Chatham Docks should not be solely set for residential allocation.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 358	N/A	MPs, Members and Parish Councils	We were surprised to find that there are two new and distinct areas allocated for housing that were not part of the Regulation 18. We have reviewed these and make specific arguments as to why we oppose the land west of Strood and Pump Lane, near Lower Twydall being allocated for housing.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 359	N/A	MPs, Members and Parish Councils	We have major concerns regarding flood defence proposals.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 360	N/A	MPs, Members and Parish Councils	Have suggested additional proposed residential sites to meet housing totals by reallocating sites removed from Regulation 19; detailed maps and Appendix 3 listing the housing numbers are included in submission Areas include: Rochester Peninsula: free up undeveloped land for substantial housing by compulsory purchasing Castle View Business Park. St Andrew's Pit (North Halling): low-density housing near existing services and bus links. Merryboys Road (Cliffe Woods) and Common Lane (Cliffe): new allocations on lower-grade agricultural land. Allhallows and Grain: portions of previously identified areas to house local growth while avoiding Grade 1 farmland.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 361	N/A	MPs, Members and Parish Councils	Policy SA2 - This is in compliance with the Star Hill to Sun Pier Development Framework – which we broadly support, except where we have provided specific comments. The are described on the Urban Core Policy Map.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 362	N/A	MPs, Members and Parish Councils	We have significant concerns about this concept plan. In essence these are: Basin 3 Chatham Docks and riverside allocations - Support mixed-use on both sides of Basin 3 and reduction of housing numbers and footprint, with housing moved to the northern fringe. GN15 housing allocation concern - GN15 is overlarge for the site; meeting the proposed number would require several tall, multi-storey buildings that would be out of character with the surrounding riverfront. GN6 heritage recommendation - Retain and incorporate the industrial archaeology of the former gas holder lattice steel frames into regeneration, using them as a design feature	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 363	N/A	MPs, Members and Parish Councils	Regulation 19 includes masterplans but many are opaque and some districts lack any concept plan. Districts missing concept plans: SA1 Chatham Town Centre and Surrounds; SA3 Gillingham District Centre; SA5 Strood Town Centre and Surrounds; SA9 High Halstow. Medway Liberal Democrats argue each identified district should have an indicative masterplan to guide delivery.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 364	N/A	MPs, Members and Parish Councils	Support the Concept Plan (Figure 14) but the Policy Map zoning does not match it; amend the North West Policy Map to align. Redistribute housing/industry to safeguard key green and community assets: Green Corridor (Hoo–Chattenden), Cockham Community Parkland, Hoo Wetlands Reserve, Environmental Conservation Land, Deangate Community Parkland, woodland north of Lodge Hill SSSI, and greenspace north of Deangate Retail Park. Support a new east-of-Hoo centre with supermarket, community centre, Healthy Living Centre and land for a future railway station. Proposed reallocations: transfer site HHH35 to residential; concentrate industrial uses on the former power station and	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden & Figure 14: Hoo St Werburgh and Chattenden Concept Plan	Amend the North West Policy Map zoning to align with the Concept Plan (Figure 14).	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 365	N/A	MPs, Members and Parish Councils	We believe that site RN9, Pump Lane is not appropriate for development, as it is Grade 1 agricultural land. Medway Council's own Policy T14 states that such land should only be used as a last resort, when all other options have been exhausted.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 366	N/A	MPs, Members and Parish Councils	We believe that the Land West of Strood site is not appropriate for development, as it is Grade 1 agricultural land. Medway Council's own Policy T14 states that such land should only be used as a last resort, when all other options have been exhausted. In addition, we have concerns regarding biodiversity loss through development of the site. In our overall response, we have identified lower grade agricultural land in Cliffe, Allhallows and Grain to achieve the same housing allocation numbers.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 367	N/A	MPs, Members and Parish Councils	Regarding Policy SA7, due to the absence of the Local Plan, much of these allocations have already received planning permission. We have concerns about coalescence with Lidsing and general lack of infrastructure, in particular traffic connections and utilities.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 368	N/A	MPs, Members and Parish Councils	We believe that in order to prevent ghettoisation communities should be connected. We have suggested that housing should be developed from Strood and Frindsbury. We have also outlined improvements for transport connections, walking and cycling routes, and the safeguarding of designated greenspaces.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 369	N/A	MPs, Members and Parish Councils	In our response we have noted that there are no policies provided for Thames port, Innovation Park and Gillingham Business Park. We have reallocated/reconfigured sites within Kingsnorth and Thamesport.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 370	N/A	MPs, Members and Parish Councils	It is accepted that no masterplan is required for this policy. Broadly we are accepting the policy, with some caveats.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 371	N/A	MPs, Members and Parish Councils	It is accepted that no masterplan is required for this policy. Broadly we are accepting the policy, with some caveats.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 372	N/A	MPs, Members and Parish Councils	Suggested additions to Policy S1: 1.Retrofit homes: require insulation (roofs, floors, walls, double glazing) and heat source pumps for existing homes, not limited to low-income households. 2. EV charging provision: deliver more electric vehicle charging points across Medway. 3. Zero-emission buses: require buses to be hydrogen or electric. 4. Solar on new homes: mandate solar panels on all new properties in line with the New Homes/Solar Generation requirements.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Suggested additions to Policy S1: 1.Retrofit homes: require insulation (roofs, floors, walls, double glazing) and heat source pumps for existing homes, not limited to low-income households. 2. EV charging provision: deliver more electric vehicle charging points across Medway. 3. Zero-emission buses: require buses to be hydrogen or electric. 4. Solar on new homes: mandate solar panels on all new properties in line with the New Homes/Solar Generation requirements.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 373	N/A	MPs, Members and Parish Councils	The revised S2 is clearer and more specific in its points and strategies. The new Hoo Peninsula Strategic Environmental Programme is positive but needs editing to separate strategies from policies so each can be applied clearly. We accept the rewrite of Biodiversity Net Gain but object to the minimum remaining at 10% and recommends increasing the BNG requirement to 15% to better address the objectives.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	The Hoo Peninsula Strategic Environmental Programme but needs editing to separate strategies from policies so each can be applied clearly. Also recommend increasing the BNG requirement to 15%.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 374	N/A	MPs, Members and Parish Councils	Accepted – regarding 4.6.1 many of the green flag parks are not marked-up on the policy maps. Recommendation: all parks meeting Green Flag standards (e.g. Broomhill) should be identified and protected on the Policy Maps. Refer to our mark ups of the policy maps	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Mark up Policy maps to show all parks that meet Green Flag standards	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 375	N/A	MPs, Members and Parish Councils	Revised version accepted.	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 376	N/A	MPs, Members and Parish Councils	At end of paragraph 4.8.2 add "and account should be taken of this when permitting new developments".	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.2	at end of paragraph 4.8.2 add "and account should be taken of this when permitting new developments".	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 377	N/A	MPs, Members and Parish Councils	Add to paragraph 4.8.3 "It should be noted that some parts of the Peninsula are now counted as London's flood plain and further development in these areas should be avoided as the dykes will be allowed to fail "	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.3	Add to paragraph 4.8.3: "It should be noted that some parts of the Peninsula are now counted as London's flood plain and further development in these areas should be avoided as the dykes will be allowed to fail "	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 378	N/A	MPs, Members and Parish Councils	At paragraph 4.8.7: after "sea level rise is possible by 2100" add aggravated by the topography of the Thames and Medway Estuaries	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.7	Paragraph 4.8.7 - after "sea level rise is possible by 2100" add "aggravated by the topography of the Thames and Medway Estuaries"	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 379	N/A	MPs, Members and Parish Councils	Paragraph 4.8.8: "alongside an increased risk" add "of winter run off".	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.8	Paragraph 4.8.8 - after "alongside an increased risk" add "of winter run off".	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 380	N/A	MPs, Members and Parish Councils	Accepted, however the wording of 4.8.4 does not detail specific plans on how the council shall use what is known as "Hard engineering", or natural resources, where construction is used to prevent the risk of flooding, e.g. sea walls, flood barriers and embankments	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management & Paragraph 4.8.4	Paragraph 4.8.4 - detail specific plans on how the council shall use what is known as "Hard engineering", or natural resources, where construction is used to prevent the risk of flooding, e.g. sea walls, flood barriers and embankments	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 381	N/A	MPs, Members and Parish Councils	We note the additional criteria set out in DM2. However, in addition we would like an additional clause: All remediation works should have a PRA that covers people living and working nearby, to ensure that they are not adversely affected by escape of pollution from the site.	4. Natural Environment	4.9 Contaminated land	Policy DM2: Contaminated Land	To Policy DM2 add an additional clause: All remediation works should have a PRA that covers people living and working nearby, to ensure that they are not adversely affected by escape of pollution from the site.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 382	N/A	MPs, Members and Parish Councils	Increase the zones for air monitoring to include the new sites in order to determine where AQMAs should be extended/implemented. With the strategic aim to start reducing/eliminating the AQMAs towards the end of the Local Plan period	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality	Increase the zones for air monitoring to include the new sites in order to determine where AQMAs should be extended/implemented. With the strategic aim to start reducing/eliminating the AQMAs towards the end of the Local Plan period	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 383	N/A	MPs, Members and Parish Councils	In line with our previous comment: Support, but we would like to have added the recommendations made by CPRE to achieve darker skies at night by reducing/eliminating light pollution in the countryside and lowers energy costs. This is particularly relevant to Hoo Peninsula and Higham Marshes, areas that have potential to become "dark skies areas".	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light	Add the recommendations made by CPRE to achieve darker skies at night by reducing/eliminating light pollution in the countryside and lowers energy costs.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 384	N/A	MPs, Members and Parish Councils	In line with our previous comment: we consider 6km to be a minimum, and we agree with Birdwise that the figure should be set at 8km.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites		No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.104	File R	Medway Liberal Democrats	SDLP 385	N/A	MPs, Members and Parish Councils	Add to ss 1 - We would recommend that Medway Council produces an overarching design that can be enhanced within Neighbourhood, but conflicts between the separate entities. The overarching design guide can ensure that applications are compliant with landscape and Visual Impact assessment. This can include the updating and enhancing of the Medway Housing Design Standard. Design, character and site context - Accepted Water/flooding - Accepted Accessibility - Accepted, except: The revised description for accessibility does not mention access to the countryside. - this needs to be reincorporated (ref to Regulation 18 consultation) Landscape, trees and amenity In Regulation 18 version there is mention of tree canopy cover – this ought to be reincorporated into this revised subsection. Amenity and inclusivity Accepted, except: Provision of green spaces is vital for the connection of wildlife spaces across Medway. On large developments, developers shall ensure that there is either a park included within the scheme or access to an existing park. Smaller developments shall take into consideration open community space for wildlife and amenities.	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenity	Add to ss 1 - We would recommend that Medway Council produces an overarching design that can be enhanced within Neighbourhood, but conflicts between the separate entities. The overarching design guide can ensure that applications are compliant with landscape and Visual Impact assessment. This can include the updating and enhancing of the Medway Housing Design Standard.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 386	N/A	MPs, Members and Parish Councils	Policy ignores future sea level rise for coastal and estuary developments. Reliance on the EA Shoreline Management Plan is insufficient; managed realignment areas may breach and expose assets. Roles, responsibilities and coordination between Medway Council, the Environment Agency, Internal Drainage Boards and water companies are not defined. Low-lying Hoo Peninsula farmland (Church Street to Coombe Bay Point) is at particular risk. Rural landscape protection outside Kent Downs (notably North Kent Fruit Belt and Cockham Wood) is missing from	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 387	N/A	MPs, Members and Parish Councils	Support DM6 in its entirety, except and in line with our previous comment: ss 6 – we propose minimum standard of new housing should be set at Eco Homes, and preferably Passive Haus where economically viable.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Policy DM6 ss 6 – we propose minimum standard of new housing should be set at Eco Homes, and preferably Passive Haus where economically viable.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 388	N/A	MPs, Members and Parish Councils	Support latest revision of this section with nothing to add or amend	5. Built Environment	5.5 Shopfront design and security	Policy DM7: Shopfront Design and Security		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 389	N/A	MPs, Members and Parish Councils	ss 1 & 2 – parameters to be set within the over-arching Medway Design Guide (mentioned in response to T1 ss1) which prevents size creep. Support ss 3 & 4	5. Built Environment	5.6 Advertisements	Policy DM8: Advertisements	Policy DM8 ss 1 & 2 – parameters to be set within the over-arching Medway Design Guide	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 390	N/A	MPs, Members and Parish Councils	Support with minimal amendment – except that the wording should include ancient monuments, even though there is a specific policy for ancient monuments It is noted that ancient monuments are now included in section 5.8.3, it would be appreciated if "village greens" can also be added.	5. Built Environment	5.7 Historic environment	Policy S8: Historic Environment	The wording in Policy S8 should include ancient monuments, even though there is a specific policy for ancient monuments. In section 5.8.3, it would be appreciated if "village greens" can also be added.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 391	N/A	MPs, Members and Parish Councils	Accept the tightened parameters in paragraph 1. Paragraph 2 – penultimate sentence after “and wider setting” add: Our historical village greens, such as Grain, Frindsbury, Gillingham Greens and Hook Meadow should be identified as heritage assets, as they are part of our historical landscape and as such they should be protected. We would like specific parameters to be incorporated so that the “out-weighting” can be demonstrated and quantified. In line with our previous comment: paragraph 5 - rewrite the sentence to include permission to demolish and leave as an open space when the building is in an exceptional state of disrepair that it could collapse. Also, add a paragraph that reminds the owner of the property that they maintain their buildings and not let them fall into a state of disrepair – especially when they are an historic asset. Add a subsection regarding works on or to listed buildings and	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	Policy DM9 Paragraph 2 – penultimate sentence after “and wider setting” add: Our historical village greens, such as Grain, Frindsbury, Gillingham Greens and Hook Meadow should be identified as heritage assets, as they are part of our historical landscape and as such they should be protected. We would like specific parameters to be incorporated so that the “out-weighting” can be demonstrated and quantified. Paragraph 5 - rewrite the sentence to include permission to demolish and leave as an open space when the building is in an exceptional state of disrepair that it could collapse. Also add a paragraph that reminds the owner of the property that they maintain their buildings and not let them fall into a state of disrepair – especially when they are an historic asset. Add a subsection regarding works on or to listed buildings and assets.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 392	N/A	MPs, Members and Parish Councils	Support with nothing to add or amend	5. Built Environment	5.9 Star Hill to Sun Pier	Policy S9: Star Hill to Sun Pier		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 393	N/A	MPs, Members and Parish Councils	Amend sentence in paragraph 1 to “will only be encouraged” Paragraph 2 – next line missing “bullet point” – plus correct grammar (singular and plural mixed). Acknowledge the tightening of parameters, however, we would still like the addition of cross-referencing with the green spaces and tree preservation orders	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas	Policy DM10 Amend sentence in paragraph 1 to “will only be encouraged” Paragraph 2 – next line missing “bullet point” – plus correct grammar (singular and plural mixed). Add cross-referencing with the green spaces and tree preservation orders.	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 394	N/A	MPs, Members and Parish Councils	We note the tightening of parameters and clauses such that there are more mandatory than desired, and deem this as an improvement.	5. Built Environment	5.11 Scheduled monuments and archaeological sites	Policy DM11: Scheduled Monuments and Archaeological Sites		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 395	N/A	MPs, Members and Parish Councils	We are in agreement with the policies as listed, and are pleased with the change to the figures as now set out in 6.2.3.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 396	N/A	MPs, Members and Parish Councils	In line with our previous comment: The only land that should be built on in current Green Belt land is that which is designated as Grey Belt. We oppose paragraph 2, as we do not accept that Grade 1 agricultural land being repurposed as Grey Belt. We would accept grades 4 and 5 agricultural land being repurposed as Grey Belt.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 397	N/A	MPs, Members and Parish Councils	We acknowledge that this section has been improved and are pleased that both housing for disabled and looked-after children has been incorporated. Note that there is the need for some tweaking of bullet points and grammar required in Policy T4.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Policy T4 - There is the need for some tweaking of bullet points and grammar required.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 398	N/A	MPs, Members and Parish Councils	Support with nothing to add or amend. However, note the typo and grammar error in paragraph 5 of Policy T5.	6. Housing	6.5 Student accommodation	Policy T5: Student Accommodation	Policy T5 - amend the typo and grammar error in paragraph 5.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 399	N/A	MPs, Members and Parish Councils	In line with our previous comment: Nothing to add or amend.	6. Housing	6.6 Mobile home parks	Policy T6: Mobile Home Parks		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 400	N/A	MPs, Members and Parish Councils	In line with our previous comment: Nothing to add or amend – Except: Bullet point 5 – the clause needs proof reading, grammar improved, and spell out Biodiversity Action Plan, rather than using an acronym (as it is only used once).	6. Housing	6.7 Houseboats	Policy T7: Houseboats	Amend Policy T7 Bullet point 5 – the clause needs proof reading, grammar improved, and spell out Biodiversity Action Plan, rather than using an acronym (as it is only used once).	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 401	N/A	MPs, Members and Parish Councils	Do not include the word “favourably” as this gives impression that the council is encouraging their growth. Rather “shall be rejected unless they meet strict conditions”, The policy should include parameters so that residents and developers know the limitations of HMOs in a given area. We acknowledge that HMOs shall comply with the minimum living space parameters (i.e. National Described Space Standards) In line with our previous comment: The licencing process should be made more rigorous with officers inspecting the final build before granting the licence.	6. Housing	6.8 Houses of multiple occupation	Policy T8: Houses of Multiple Occupation	Amend Policy T8: Do not include the word “favourably” , rather use: “shall be rejected unless they meet strict conditions”, The policy should include parameters so that residents and developers know the limitations of HMOs in a given area. The licencing process should be made more rigorous with officers inspecting the final build before granting the licence.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 402	N/A	MPs, Members and Parish Councils	In line with our previous comment, the 100+ units proposal is a positive and is supported. Support with nothing to add or amend.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 403	N/A	MPs, Members and Parish Councils	Support the policy, and we acknowledge the tightening of criteria for the safeguarding of existing sites and new sites. We also agree with the intensification of existing sites to try and mitigate random pitching-up.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 404	N/A	MPs, Members and Parish Councils	We acknowledge the following: * Bullet point 2 has been amended but requires proof reading and editing * Addition of bullet points 8 & 9, latter incorporating reference to policy T3 * In line with our previous comment: The policy should still refer to policy T2 and in addition a statement regarding adequate site services and utilities, including potable water,	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders	Policy T11 Bullet point 2 requires proof reading and editing. Policy T11 should still refer to policy T2 and in addition a statement regarding adequate site services and utilities, including potable water, sewerage, electricity and data/telecoms.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 405	N/A	MPs, Members and Parish Councils	In line with our previous comment: we would prefer the GLA recommended minimum spatial areas In line with our previous comment – we would request that the Medway Housing Design Standard be updated to include the minimum internal spatial recommendations/parameters as directed by the GLA. Support 3, 4, 5, 6, 7, 8 & 9	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design	Request that the Medway Housing Design Standard be updated to include the minimum internal spatial recommendations/parameters as directed by the GLA.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 406	N/A	MPs, Members and Parish Councils	Policy T3 Paragraph 2 – we accept the current Tenure mix is a fair reflection of what is required for Medway. However, we would like the affordable portion to have a more specific parameter. Acknowledge the final paragraph of this policy with the local connection cascade. We acknowledge the inclusion of s.106 in paragraph 6, but as per our previous comment: paragraph 4 and its subsections - We recommend that as many applications as possible meet the original quotas and that a system of incremental payments of s.106 be released through the duration of the project to ensure there is no shortfall upon project completion. When social and affordable housing quotas are not met, we recommend the use of sequestration orders by the Council to supply social and affordable housing.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Policy T3 Paragraph 2 - Would like the affordable portion to have a more specific parameter, i.e.20% affordable/social rent, 10% affordable to buy. Paragraph 4 and its subsections - We recommend that as many applications as possible meet the original quotas and that a system of incremental payments of s.106 be released through the duration of the project to ensure there is no shortfall upon project completion. When social and affordable housing quotas are not met, we recommend the use of sequestration orders by the Council to supply social and affordable housing.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 407	N/A	MPs, Members and Parish Councils	Accepted – refer to our comments on SA14.	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites		No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 408	N/A	MPs, Members and Parish Councils	In line with our previous comment: the issue of this policy is not so much the wording, rather its implementation. Our argument with regards to Net Zero remains. * Ss3 - explains how it fails the Net Zero target, suggests utilising Chatham Docks. * Paragraph 2 - ss1 - Chatham Docks for housing is contrary to this policy. Concern over loss of industrial land at Chatham Docks and Medway City Estate. ~~* Suggest the other subsections~~	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 409	N/A	MPs, Members and Parish Councils	We acknowledge that the policy has been strengthened, but concerns remain mainly in higher education. This is due to defunding of universities at the Maritime site. This is likely to remain an issue whilst the universities are third party. Long-term policy could be a University of Medway, or ~~secure of tenure~~	7. Economic Development	7.5 Learning and skills development	Policy T12: Learning and skills development		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 410	N/A	MPs, Members and Parish Councils	In line with our previous comment: Support with nothing to add or amend.	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Policy T13: Tourism, culture and visitor accommodation		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 411	N/A	MPs, Members and Parish Councils	* ss 1 – clarification needed over how this is to be implemented. * In line with our previous comment: ss 2 - Chatham Docks is mentioned – we do not think it is a space that alludes to cultural use. It is best used for industry and manufacturing. * We support the other subsections.	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries	Policy S14 ss2 remove reference to Chatham Docks	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 412	N/A	MPs, Members and Parish Councils	The policy is quite reasonable, but the implementation is of concern. Concern is raised regarding reduction of existing employment areas, like Innovation Park and Gillingham ~~Business Park~~	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 413	N/A	MPs, Members and Parish Councils	There are two references to this policy (S13), but the policy is not within the latest version of Appendix 1. In the Regulation 18 S13 was subtitled Innovation Park, in Regulation 19, it is subtitled Isle of Grain – but it is not in the document	7. Economic Development		Policy S13 - Innovation Park Medway	Remove references within the Local Plan to Policy S13 - Innovation Park Medway.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 414	N/A	MPs, Members and Parish Councils	In line with our previous comment: Question “immense”? otherwise support 1. b. Hempstead Valley is not a district centre – rather Hempstead and Dockside should be in the “out-of-town” shopping centres section. Less 1. b. other ~~subsections accepted~~	8. Retail and Town Centres	8.3 Hierarchy of centres	Policy S16: Hierarchy of centres	Question “immense”? Suggest Hempstead and Dockside should be in the “out-of-town” shopping centres section.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 415	N/A	MPs, Members and Parish Councils	No comment.	8. Retail and Town Centres	8.4 Sequential assessment	Policy T15: Sequential assessment		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 416	N/A	MPs, Members and Parish Councils	* Policy targets developers but ignores support for the existing rural economy, farmers, and labourers. * Missing measures: farmer support networks, farmers' markets, and assistance to promote organic local growth. * Recommend inclusion of regenerative agriculture, modern horticulture (e.g., viticulture), and support for rural diversification such as local energy generation. * Policy should prioritise and tailor support for the Hoo ~~Peninsula and local areas, Gillingham and Hellingly~~	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy	Suggests adding Missing measures: farmer support networks, farmers' markets, and assistance to promote organic local growth.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 417	N/A	MPs, Members and Parish Councils	ss 3 and ss 5 need re-writing – especially ss 5 disagree with regards to the Pentagon being at the top of the hierarchy. ss 6 to ss 11 supported In line with our previous comment: Include a ss policy for support of local and farmers' markets	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy	ss 3 and ss 5 need re-writing – especially ss 5 disagree with the Pentagon being at the top of the hierarchy, Suggest including a ss policy for support of local and farmers' markets	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 418	N/A	MPs, Members and Parish Councils	In line with our previous comment: Managed ancillary spaces, more attention should be given to areas that are remote to prevent long distance travel. Thus, there needs to be more retail units at Chattenden, Cliffe and High Halstow. ~~Otherwise agree~~	8. Retail and Town Centres	8.5 Ancillary development	Policy T16: Ancillary development	Managed ancillary spaces, more attention should be given to areas that are remote to prevent long distance travel. Thus, there needs to be more retail units at Chattenden, Cliffe and High Halstow	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 419	N/A	MPs, Members and Parish Councils	Accepted.	8. Retail and Town Centres	8.8 Rochester district centre	Policy S18: Rochester district centre		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 420	N/A	MPs, Members and Parish Councils	We acknowledge that paragraph 2 of Policy S19 has been rewritten. – and thus, this policy is accepted.	8. Retail and Town Centres	8.9 Gillingham district centre	Policy S19: Gillingham district centre		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 421	N/A	MPs, Members and Parish Councils	Policy S20: Accepted, (note a bullet point is blank). Improve the description (to make clear what is happening) regarding the proposed additional platforms for the connection from ~~Strood to London Victoria~~	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre	Amend blank bullet point. Improve the description (to make clear what is happening) regarding the proposed additional platforms for the connection from Strood to London Victoria.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 422	N/A	MPs, Members and Parish Councils	Accepted.	8. Retail and Town Centres	8.11 Rainham district centre	Policy S21: Rainham district centre		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 423	N/A	MPs, Members and Parish Councils	Accepted – we acknowledge the improvement and greater specificity of this policy – note typo in last paragraph (“talking” should be “taking”) (in line with our previous comment). Plus, there are formatting issues, like missing ~~bullet points~~	8. Retail and Town Centres	8.12 Hoo Peninsula	Policy S22: Hoo Peninsula	Policy S22 - Amend typo in last paragraph (“talking” should be “taking”). Plus, there are formatting issues, like missing bullet points.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 424	N/A	MPs, Members and Parish Councils	In line with our previous comment: We do not consider Hempstead Valley as a district centre. Rather it should be put in as an out-of-town retail along with Dockside. Then ~~they can be enhanced appropriately~~	8. Retail and Town Centres	8.13 Hempstead Valley district centre	Policy S23: Hempstead Valley district centre	Policy S23 - Amend Hempstead Valley as an out-of-town retail along with Dockside.	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 425	N/A	MPs, Members and Parish Councils	The Regulation 19 has a blanket set of values for all areas. We disagree with the revised blanket approach and think the locations and their values should be reinstated and also include the other shopping centres, e.g. Chatham Dockside, Horsted, Hoath Lane (Gillingham Business Park).	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment	Amend the revised blanket approach and reinstate the locations and their values and also include the other shopping centres, e.g. Chatham Dockside, Horsted, Hoath Lane (Gillingham Business Park).	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 426	N/A	MPs, Members and Parish Councils	In line with our previous comment: * SS 5 needs rewriting – does not have principal aim. * SS 6 – do not permit ground floor residencies on the High Street within the prime shopping zone as shown on the town centre plan.	8. Retail and Town Centres	8.7 Chatham town centre	Policy S17: Chatham town centre	Policy S17 SS 5 needs rewriting – does not have principal aim. SS 6 – do not permit ground floor residencies on the High Street within the prime shopping zone as shown on the town centre plan.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 427	N/A	MPs, Members and Parish Councils	Policy T19: Accepted – we acknowledge the redrafting and conciseness of the revised policy. (Note that there are some typo and grammar issues.)	8. Retail and Town Centres	8.16 Meanwhile uses	Policy T19: Meanwhile uses	Policy T19 Amend some typo and grammar issues.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 428	N/A	MPs, Members and Parish Councils	Accepted.	8. Retail and Town Centres	8.17 Medway Valley Leisure Park	Policy DM13 Medway Valley Leisure Park		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 429	N/A	MPs, Members and Parish Councils	In line with our previous comment: Sub-policies accepted – typo in sub-policy 3, ought to read “1 b. to d above.” In addition to those retail areas listed we would like to add Horsted Retail Park and Strood Retail Park. A further addition: Grain retail should be upgraded from Neighbourhood Centre (policy T18) to Rural Centre (policy DM12) There are some typos where naming roads, e.g. Brompton High Street, Darnley Road (x2) & Cedar Road.	8. Retail and Town Centres	8.14 Local and rural centres	Policy DM12: Local and rural centres	Amend typo in sub-policy 3, to be “1 b. to d above.” Suggest adding Horsted Retail Park and Strood Retail Park to retail areas listed . A further addition: Grain retail should be upgraded from Neighbourhood Centre (policy T18) to Rural Centre (policy DM12) There are some typos where naming roads, e.g. Brompton High Street, Darnley Road (x2) & Cedar Road	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 430	N/A	MPs, Members and Parish Councils	* More Medway crossings are needed for cycling and walking; currently only Rochester Bridge and the M2 eastbound cycle lane connect east and west. * The transport section mixes tenses, making the 2041 vision unclear and hard to interpret. * Support for a Bus Rapid Transit corridor linking Hoo St Werburgh and Strood town centre.	9. Transport	9.1 Vision for access and movement in Medway		Suggest amending tenses in the Transport section to make it clearer and easier to understand.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 431	N/A	MPs, Members and Parish Councils	We agree with the concept and acknowledge the redrafting at the start of this policy. In line with our previous comment: We have severe reservations about the lack of protection for the majority of rural areas – we think these areas should be uprated to be included as rural centres and placed within DM12. In addition, we have noticed several typos, e.g. Rainham High Street, Canterbury Street, Cazeneuve Street	8. Retail and Town Centres	8.15 Shopping parades and neighbourhood centres	Policy T18: Shopping parades and neighbourhood congregated Neighbourhood Centres	Suggest adding protection for the majority of rural areas – these areas should be uprated to be included as rural centres and placed within DM12. In addition, amend several typos.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 432	N/A	MPs, Members and Parish Councils	We acknowledge the substantive improvement of this policy. We support the use of Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance to deliver the aspiration. We accept the revised policy.	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 433	N/A	MPs, Members and Parish Councils	We acknowledge that this policy has been substantiated in other policies (e.g. S19 -Gillingham District Centre) and thus we accept this policy.	9. Transport	9.3 Active travel interventions	Policy DM16: Chatham Waters line		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 434	N/A	MPs, Members and Parish Councils	* Dockside = leisure + out-of-town retail. * Floorspace test removal accepted. * Retail assets to include: Outlet Centre, Pier 5, Ship & Trades row, Copper Rivet. * Leisure assets: two basins, Pier 5, Odeon, former Dickens Centre, unused pier. * Unused pier best as mixed use (housing, retail, leisure). Existing wharf and pier apartment capacity can be increased with mixed development.	8. Retail and Town Centres	8.18 Dockside	Policy DM14: Dockside		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 435	N/A	MPs, Members and Parish Councils	We acknowledge the improved specificity, and welcome the inclusion of Gillingham Pier, Sun Pier and Rochester Bridge. In line with our previous comment: riverside infrastructure needs the inclusion of Chatham Docks.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure	Suggest riverside infrastructure needs the inclusion of Chatham Docks.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 436	N/A	MPs, Members and Parish Councils	Accepted with corrections. In line with our previous comment: there remain some minor errors: * ss 4 – “sewage” needs to be changed to “sewerage”. * ss 5 – “environment” should read “environmental”. * ss 6 & 7 – more acronyms within a policy: SPA, RAMSAR, SAMMS.	9. Transport	9.6 Marinas and moorings	Policy T22: Marinas and moorings		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 437	N/A	MPs, Members and Parish Councils	Accepted.	9. Transport	9.7 Aviation	PolicyT23: Aviation		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 438	N/A	MPs, Members and Parish Councils	* The acronym IDP is used before it is defined; it should be introduced as Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy. * The Strategic Transport Assessment (STA) and the IDP are not yet provided; the policy text has been changed to future tense to reflect that they will be published later. * Strong objection to exempting all urban centres from monitoring and managing; any exemption must require full compliance with policy first, otherwise the exemption is not valid.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation	Suggest: Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 439	N/A	MPs, Members and Parish Councils	Accepted.	9. Transport	9.9 User hierarchy and street design	Policy T25: User hierarchy and street design		No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 440	N/A	MPs, Members and Parish Councils	* Request Medway Council coordinate with Gravesham Borough to safeguard land along the Higham Curve alignment to enable full rail integration from Grain to Rainham and connections via the Medway Valley line. * Increase safeguarding at Cooling Street to reserve land for a future station serving Cliffe Woods, Cliffe, Cooling, Cooling Street and Spendiff (see MLD North West Policy Map mark-up). * Sharnal Street should not be treated as a terminus; the Grain line should be considered for future passenger services to Grain. * Policy naming and mapping should reflect the full Grain Branch by hatching the line continuously to Grain rather	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch	Policy naming and mapping should reflect the full Grain Branch by hatching the line continuously to Grain rather than stopping at Sharnal Street.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 441	N/A	MPs, Members and Parish Councils	In line with our previous comment: Accepted, but again use of acronyms without using the actual name, i.e. SRN in this instance.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans	Amend use of acronyms without using the actual name, i.e. SRN in this instance.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 442	N/A	MPs, Members and Parish Councils	In line with our previous comment: The policy needs “beefing-up” to incorporate the statements made in paragraphs 9.8.2, 9.8.4 and 9.8.6. The policy needs to identify the land which would address the shortfall of warehouse land mention in 9.8.6. Or otherwise set out ~~change of use conditions that would be acceptable~~	9. Transport	9.8 Urban logistics	Policy T24: Urban logistics	The policy T24 needs “beefing-up” to incorporate the statements made in paragraphs 9.8.2, 9.8.4 and 9.8.6. The policy needs to identify the land which would address the shortfall of warehouse land mention in 9.8.6. Or otherwise set out change of use conditions that would be acceptable.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 443	N/A	MPs, Members and Parish Councils	Supported.	9. Transport	9.12 Parking	Policy DM20: Cycle Parking and storage		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 444	N/A	MPs, Members and Parish Councils	* Prioritise cycling and public transport for all key places except primary schools. * Target: key services (shops, schools, healthcare) within 15 minutes by walking or cycling; allow justified exceptions. * New housing must connect to bus network and be within a 15-minute walk of a bus stop. * Developers must provide walking, cycling or public-transport access to train stations. * Achieving this requires more investment in bus frequency and affordability to cut car dependence. * Where 15-minute active travel is unachievable, permit exceptions with required mitigations.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 445	N/A	MPs, Members and Parish Councils	In line with our previous comment: We think that the parking plan is “out-of-date” and the policy does not contain a firm commitment to providing a revised standard to take the plan through to 2040. The remaining portion of the policy is accepted, especially regarding EV charging points.	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking	Policy DM19 should contain a firm commitment to providing a revised standard to take the plan through to 2040	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 446	N/A	MPs, Members and Parish Councils	* We acknowledge that the Parameters section has been moved Fields in Trust Standards 2024. * Items a) to f) accepted * Items g) to j) supported – however, item j) still needs rewording to be more specific	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces	Policy DM21 item j) still needs rewording to be more specific.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 447	N/A	MPs, Members and Parish Councils	Accepted.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities		No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 448	N/A	MPs, Members and Parish Councils	* Paragraph 1 ss 1 – the Green and Blue Infrastructure Plan remains draft and is out-of-date. It still requires revising and adopting to be part of the Regulation 19 submission. * In line with our previous comments – the current walking and cycling plans remain weak. There are certainly not enough (at present) for there to be a strategic network. * Acknowledge that the Council has now included a new Healthy Living Centres (HLCs) in Strood and have an infrastructure plan that requires a HLC in the eastwards expansion of Hoo. * ss 2 to ss 4 accepted, ss 5 to ss 7 – supported. * ss 8 – accepted, but in line with our previous comment, have additionally that the policy should have support for teaching of healthy diets and cooking, and encourage the use of social prescribing (e.g. joining a gym, going to classes) for those who are obese. * ss 9 – accepted. * Paragraph 2 – ss 1 and ss 2 – accepted. ss 3 supported, but in line with our previous comment add the provision that developers assist the supply and/or funding of new allotment spaces. ss 4 – we accept that there may be areas that could end up with over-provision, but in line with our previous comment refute the concept that the improvements are “lost” – rather the provision should be juxtaposed within Medway to an area where there is under-provision. * ss 5 – accepted. * ss 6 – in line with our previous comment, the HIA should be raised up in the hierarchy and should be made mandatory (or have clear parameters) for all major	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Suggest revising the Green and Blue Infrastructure Plan. Policy T27 paragraph 2 ss3 add the provision that developers assist the supply and/or funding of new allotment spaces. Policy T27 Paragraph 2 ss6 - the HIA should be raised up in the hierarchy and be made mandatory (or have clear parameters) for all major developments as part of the development design process.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 449	N/A	MPs, Members and Parish Councils	* Item a) should be removed because reducing/removing public space always causes material harm; item b) should be the default for existing open spaces. * Items b)–e) accepted. * Items f)–l) accepted. * The previously problematic final sentence has been removed. * Request to register historically proven commons and village greens (e.g., Grain Village Green, Frindsbury Green, Rede Common, Hook Meadow, Gillingham Green) and	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces	Policy T28 Item a) should be removed because reducing/removing public space always causes material harm; Request to register historically proven commons and village greens (examples given) and provide orientation boards.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 450	N/A	MPs, Members and Parish Councils	Accepted.	12. Waste Management	12.2 Future management of waste in Medway	Vision for Waste Management		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 451	N/A	MPs, Members and Parish Councils	* New subsection 4 on future proofing is acknowledged. * Current paragraph 4 focuses on short-term issues and must be rewritten to include long-term digital infrastructure requirements and rollout during the plan period. * There must be no area of Medway without access to digital infrastructure by 2041. * Paragraph 5 accepted.	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications	Current paragraph 4 focuses on short-term issues and must be rewritten to include long-term digital infrastructure requirements and rollout during the plan period.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 452	N/A	MPs, Members and Parish Councils	Accepted.	12. Waste Management	12.5 Provision of new waste management facilities	Policy T35: Provision of additional waste management facilities		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 453	N/A	MPs, Members and Parish Councils	* Policy DM23 Items a–c accepted. * Concern: Policy targets new development only and omits waste prevention for residential, commercial, and industrial sectors. * Request: Broaden policy to include waste prevention, and measures to increase reuse and recycling across all sectors	12. Waste Management	12.3 Waste prevention	Policy DM23: Waste prevention	Request: Broaden policy DM23 to include waste prevention, and measures to increase reuse and recycling across all sectors	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 454	N/A	MPs, Members and Parish Councils	Supported.	12. Waste Management	12.7 Other recovery	Policy T37: Other recovery		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 455	N/A	MPs, Members and Parish Councils	In line with our previous comments, this is accepted – however the policy (T34) needs re-writing ensuring the non-repeat of sub-item letters and to be comprehensible.	12. Waste Management	12.4 Safeguarding of existing waste management facilities	Policy T34: Safeguarding of existing waste management facilities	Policy T34 needs re-writing ensuring the non-repeat of sub-item letters and to be comprehensible.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 456	N/A	MPs, Members and Parish Councils	Accepted – along with ss a) and d) being supported	12. Waste Management	12.9 Beneficial use of inert waste by permanent deposit	Policy T39: Beneficial use of inert waste by permanent deposit		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 457	N/A	MPs, Members and Parish Councils	* ss 1 to ss 3 accepted * ss 4 a) to c) accepted * ss 4 d) – in line with our previous comments - add wording “in exceptional circumstance with robust evidence”.	12. Waste Management	12.6 Location of waste management facilities	Policy T36: Location of waste management facilities	Policy T36 ss4d) add wording “in exceptional circumstance with robust evidence”.	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 458	N/A	MPs, Members and Parish Councils	* Paragraph 1: ss a) and b) accepted. * ss c) amendments requested: add new I) require landfill base to be lined with engineered non-porous geotextile before any landfilling; add new ii) require final capping with non-porous geotextile liner overlaid with clay. * Renumbering: current items I) and ii) to become iii) and iv); those renumbered items are accepted. * Paragraph 2: request subsections be relabelled d) and e) to improve readability and referencing.	12. Waste Management	12.8 Landfill	Policy T38: Non-inert Landfill	Policy T38 Paragraph 1: ss c) amendments requested: add new I) require landfill base to be lined with engineered non-porous geotextile before any landfilling; add new ii) require final capping with non-porous geotextile liner overlaid with clay. Renumbering: current items I) and ii) to become iii) and iv); Paragraph 2: request subsections be relabelled d) and e) to improve readability and referencing.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 459	N/A	MPs, Members and Parish Councils	* Policy must be strengthened to address current under-capacity and future demand. * Medway Council should carry out assessments to gather robust data on water management and sewage treatment. * Use data to hold developers, the Environment Agency, and Southern Water accountable for capacity improvements.	12. Waste Management	12.10 Wastewater treatment	Policy T40: Wastewater treatment	Policy T40 must be strengthened to address current under-capacity and future demand.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 460	N/A	MPs, Members and Parish Councils	ss 10 b – additionally include the impact on the railway station, which is a listed building, railway tracks & associated carpark. We query the economic viability of building over the tracks adjacent Westmount Avenue. CCB49 - appendix 1 is devoid of how the telephone exchange is relocated.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 461	N/A	MPs, Members and Parish Councils	* Policy must be rethought; Isle of Grain and Kingsnorth should prioritise renewable generation (wind, solar) not hydrocarbons. * Establish a clear hierarchy placing hydrocarbons last to meet climate and energy security goals. * Emphasise rooftop/ depot/ carpark solar and agrivoltaics to enable dual solar-pastoral use. * Include support for blue and green hydrogen and expanded electricity storage for low-wind/low-light periods. * Add carbon capture requirement where hydrocarbons remain in use. * Paragraph 2 onward accepted.	13. Energy	13.2 Energy supply	Policy S25: Energy Supply	Policy must be rethought; Isle of Grain and Kingsnorth should prioritise renewable generation (wind, solar) not hydrocarbons. Establish a clear hierarchy placing hydrocarbons last to meet climate and energy security goals. Emphasise rooftop/ depot/ carpark solar and agrivoltaics to enable dual solar-pastoral use. Include support for blue and green hydrogen and expanded electricity storage for low-wind/low-light periods. Add carbon capture requirement where hydrocarbons remain in use.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 462	N/A	MPs, Members and Parish Councils	* Recommend removal of T41 and entire Section 13.3. * CHP networks have not achieved the efficiency or scale claimed in practice. * Prefer building to Passivhaus/Eco-House standards with solar panels as more effective and economically viable	13. Energy	13.3 Heat networks	Policy T41: Heat networks	Recommend removal of T41 and entire Section 13.3.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 463	N/A	MPs, Members and Parish Councils	* FP11: require sensitive archaeological excavation and preservation before construction. * FP12: object to loss of tourist accommodation and large function room for 70 flats. * FP14 & FP16: proposed unit numbers are too high and likely to become HMOs, harming community regeneration. * RWB19: map hatching incorrectly includes parts of Corporation Street and Star Hill as housing; these should be shown as highway works.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites	Map amendments: RWB19: map hatching incorrectly includes parts of Corporation Street and Star Hill as housing; these should be shown as highway works.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 464	N/A	MPs, Members and Parish Councils	GS19 – concern of high number of flats – either a tall building relative to adjacent to existing, or units would not meet the minimum living area – therefore we suggest number is reduced to 40 units.	14. Site Allocations	14.4 Gillingham District Centre	Policy SA3: Gillingham District Centre	Site GS19 suggest number is reduced to 40 units.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 465	N/A	MPs, Members and Parish Councils	* Object to using Grade 1 agricultural land; permit only as last resort; remove SNF1, SNF3, SR5 from the plan. * Prefer lower-grade land instead; development would harm biodiversity and risk coalescence between Strood and Higham. * Construction and post-build traffic will significantly impact local residents. * Major infrastructure deficits: gas (including a high-pressure pipeline), electricity, water, sewerage, highways and telecoms must be provided before development. * Require significant biodiversity net gain mitigation. If Medway proceeds, urge representations to Gravesham to prevent combined development (Chapter Farm) causing	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Remove SNF1, SNF3, SR5 from the plan. Major infrastructure gas (including a high-pressure pipeline), electricity, water, sewerage, highways and telecoms must be provided before development. Require significant biodiversity net gain mitigation.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 466	N/A	MPs, Members and Parish Councils	* LW8 (Mill Fields) proposed for up to 2,000 homes with a new primary school and a local centre: Infrastructure is currently inadequate for this scale of development. * Major concerns: traffic access and capacity, plus insufficient water, sewerage, gas and electricity provision	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 467	N/A	MPs, Members and Parish Councils	* SM16: keep north side mixed-use; north access via narrow bridge is inadequate. * GN6: preserve gas holder towers as industrial heritage; ensure safe, recorded contaminated-land remediation. * GN15: reduce housing target from 1,100 to ~350–400 to avoid excessive height/density. * Safeguard coastal/riverside path per policy T20. * Require a single coordinated masterplan for SM16, GN6 and GN15; current piecemeal applications show no	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	SM16: keep north side mixed-use. GN15: reduce housing target from 1,100 to ~350–400. Require a single coordinated masterplan for SM16, GN6 and GN15	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 468	N/A	MPs, Members and Parish Councils	* ss 9: Concern about provision of temporary medical services while the existing health centre is replaced. * ss 14: Propose separate masterplans for distinct clusters: SNF9/SNF15/SNF17 as one; SNF34/SNF35 as one; SNF41 as its own long riverside masterplan. * Council role: Medway Council should produce a concept plan for Strood regeneration that frames the transport interchange and the three large zones. * Density adjustment: Residential allocations along Strood Riverside should be increased to match densities of other riverside developments (see submitted Appendix 3).	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds	ss 14: Propose separate masterplans for distinct clusters: SNF9/SNF15/SNF17 as one; SNF34/SNF35 as one; SNF41 as its own long riverside masterplan. Produce a concept plan for Strood regeneration that frames the transport interchange and the three large zones. Residential allocations along Strood Riverside should be increased to match densities of other riverside developments (see submitted Appendix 3).	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 469	N/A	MPs, Members and Parish Councils	Object to RN9; reduce housing and remove west-of-Pump-Lane allocation. Number of reasons for objection given including RN9 is Grade 1 agricultural land; High flood risk; Archaeologically sensitive; worsen traffic congestion; Fewer houses would negate need for proposed schools and community centre. Development would harm setting of listed Pump House and nearby conservation area. ~~No objections to RN17, RN22, RN26~~	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Reduce housing and Remove Site RN9.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 470	N/A	MPs, Members and Parish Councils	Accepted, except for the following: CHR14 – we believe that the current working zone of Cuxton Marina should be retained, and thus only that portion north of the marina should be permitted to be transferred to residential. SR7 – to be reduced to prevent the straying onto Greenbelt land	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	Suggest CHR14 only that portion north of the marina should be permitted to be transferred to residential. SR7 – to be reduced to prevent the straying onto Greenbelt land	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 471	N/A	MPs, Members and Parish Councils	Overall accepted with two exceptions. HW6: Request safeguard of the woodland on the site and update the South East Policy Map per MLD mark-up. RWB25: Reduce the number of units at Acorn Wharf to lower building heights so they remain in keeping with the surrounding area	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites	Suggest: HW6: Request safeguard of the woodland on the site and update the South East Policy Map per MLD mark-up. RWB25: Reduce the number of units at Acorn Wharf to lower building heights so they remain in keeping with the surrounding area	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 472	N/A	MPs, Members and Parish Councils	* Support Green Corridor and mixed-use Medway City Estate changes. * North West Policy Map must be updated to match Figure 14 and ss 3/16/19 so Green Corridor, Cockham Community Parkland, Deansgate parkland, Lodge Hill greenspace, Hoo Wetlands and Environmental Conservation Land are properly safeguarded. * Resolve mapping contradictions for parts of HHH33 and HHH35; Figure 14/ss 19 should take precedence. * Support boundary extension to the Grain railway line and combined HHH22/HHH31 plus a new centre (supermarket, community centre, school). * Back Infrastructure Plan (ss 12) including a Healthy Living Centre and transport improvements (better cycling, public transport, junction upgrades); Four Elms Roundabout needs a grade-separated junction. Concern HHH12's 1,800 homes are too many given Cockham Wood park; propose redistributing housing into HHH22/HHH31 and reallocating HHH35 from industrial to	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Suggest: North West Policy Map must be updated to match Figure 14 and ss 3/16/19. Resolve mapping contradictions for parts of HHH33 and HHH35; Figure 14/ss 19 should take precedence. Propose redistributing housing for HHH12 into HHH22/HHH31 and reallocating HHH35 from industrial to residential.	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 473	N/A	MPs, Members and Parish Councils	Broad policies accepted except elements in ss 4. We have reallocated HHH35 to residential with some conservation; former Kingsnorth Power Station land allocated for industrial zone expansion (see North West Policy Map mark-up). Missing policy section for FH1 (Innovation Park); S13 was removed from Regulation 19 despite being referenced. Gillingham Business Park and Isle of Grain omitted from SA14 though they provide significant employment (e.g., Thamesport). SMI6 (Basin 3) should be redesignated as a	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	Remove references to Policy S13 - Innovation Park or add policy section for Site FH1 Innovation Park. See suggested amendments in North West Policy Map mark up	No	
Email	E.104	File R	Medway Liberal Democrats	SDLP 474	N/A	MPs, Members and Parish Councils	Reduce the HHH26 site area and increase housing density to prevent coalescence with Fenn Street, matching the approach used between Hoo and Chattenden. Subsections ss 3 to ss 11 are acknowledged and accepted. Traffic mitigation (ss 12) must safeguard land for the originally proposed highway improvement connecting Charismas Lane roundabout to Fenn Street roundabout to improve capacity and reduce accidents.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Suggest: Reduce the HHH26 site area and increase housing density. Traffic mitigation (ss 12) must safeguard land for the originally proposed highway improvement connecting Charismas Lane roundabout to Fenn Street roundabout.	No	

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Email	E.104	File R	Medway Liberal Democrats	SDLP 475	N/A	MPs, Members and Parish Councils	Support for Frindsbury Peninsula Opportunity Area and converting Medway City Estate to mixed use including housing. Frindsbury Peninsula Concept Plan should phase growth incrementally and link organically with Strood and Frindsbury to avoid ghettoisation (see MLD Urban Core Policy Map mark-up). The Frindsbury Peninsula Planning Framework must include infrastructure: a footbridge/cycle route from the peninsula's southern point to Chatham Town Centre (near Sun Pier), safeguarded zones for future greenspaces, and a riverside path. Public transport connections required to meet policy T26; none are currently proposed in this section. Urban Core Policy Map legend for FPOA does not match	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	Frindsbury Peninsula Concept Plan should phase growth incrementally and link organically with Strood and Frindsbury to avoid ghettoisation (see MLD Urban Core Policy Map mark-up). The Frindsbury Peninsula Planning Framework from ss1 a, l, must include infrastructure. Propose public transport connections to meet Policy T26.	No	
Email	E.69	File L	Mervyn Wood	SDLP 284	N/A	Members of the Public	I would like to ask the council to include article 4 direction in the future planning policy for medway.	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1601	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1602	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1603	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1604	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1605	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1606	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1607	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1608	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1609	N/A	Members of the Public	The plan proposes 6,740 new homes, risking 13,000 more vehicles on an already congested peninsula with one access road.	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1610	N/A	Members of the Public	Highways England objections remain unresolved, and the plan appears rushed and lacking essential detail.	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.31	File Q	Meryl Lapthorn	SDLP 1611	N/A	Members of the Public	Emergency access, medical and educational services, and water infrastructure are inadequately addressed.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.32	File L	Michael McEvoy	SDLP 93	N/A	Members of the Public	Object to re-classification of Green Belt and consequent release of land to the west of Strood, key objections include: - The 2025 review's methodology is opaque and biased towards development, contradicting previous findings without publicly releasing the consultant's critique. - The Duty to Cooperate statement cites only the 2020 Gravesham study and omits any updated Gravesham evidence or justification for cross-boundary development. - Medway's presumption that Gravesham will reclassify its Green Belt is premature—Gravesham's updated review and Local Plan are unpublished. - No joint masterplan or formal agreements have been made available, and the unsigned draft Statement of Common Ground lacks Gravesham's validation and necessary details. - Reclassifying high-value Grade 1 agricultural land contradicts NPPF guidance on protecting Green Belts and represents a flawed interpretation of the Framework. - The proposed release would erode a valued settlement buffer, intensify pressure on already overloaded local	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt		No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.32	File L	Michael McEvoy	SDLP 94	N/A	Members of the Public	Object to West of Strood - Proposing 4,000 homes at West Strood would boost the local population by around 31%, overwhelming already congested roads (notably the A289) and local services. - The Plan fails to secure or quantify major upgrades to transport networks, water and sewerage systems, and healthcare capacity for an estimated extra 10,000 residents. - References to M2 traffic modelling in the Duty to Co-operate are vague and do not address the severe traffic impacts on Strood's road network. - Prioritising greenfield development at West Strood in the first five years disincentivises brownfield regeneration and risks harming town and district centres. - Recommendation: defer West Strood's release until population forecasts are confirmed, necessary infrastructure improvements are in place, and brownfield opportunities have been fully pursued.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.32	File L	Michael McEvoy	SDLP 95	N/A	Members of the Public	Strood District Centre objection: The Plan ignores the extra pressure West Strood will place on Strood's district-centre services and facilities and offers no clear explanation of how the existing masterplan still provides reliable guidance – making the policy unsound. - Strood is already overwhelmed by traffic; adding West Strood would drive significantly more vehicles through to Rochester, Chatham, and Gillingham, yet no robust traffic-management measures are proposed (beyond generic public-transport enhancements) – rendering the policy	8. Retail and Town Centres	8.10 Strood district centre	Policy S20: Strood district centre		No	
Email	E.32	File L	Michael McEvoy	SDLP 96	N/A	Members of the Public	Medway Council has hastily advanced its Local Plan, overlooking substantial changes and public concerns. Key decisions rest on information that hasn't been made available to consultees. The consultation period is just six weeks, despite the Council previously insisting on twelve weeks for similarly complex plans. This abbreviated timeline has limited meaningful public review, forcing respondents to focus only on their most	1. Overview	1.3 How the plan has been prepared			No	
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1467	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1468	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1469	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1470	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1471	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1472	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1473	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1474	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1475	N/A	Members of the Public	Redeveloping Chatham Docks risks job loss and erodes heritage.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1476	N/A	Members of the Public	Green Belt loss harms wellbeing and biodiversity.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.19	File Q	Michael O'Hanlon	SDLP 1477	N/A	Members of the Public	Housing scale exceeds infrastructure capacity, with poor transport, overstretched services, and severe congestion—especially around Four Elms—making plans unsustainable without major improvements	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1519	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				

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Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1520	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1521	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1522	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1523	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1524	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1525	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1526	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1527	N/A	Members of the Public	Redeveloping Chatham Docks risks job loss and erodes Medway's identity.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1528	N/A	Members of the Public	Sustainable design and elderly-friendly housing must be prioritised.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation			
Hoo Peninsula Campaign (Additional responses)	H.24	File Q	Michael White	SDLP 1529	N/A	Members of the Public	Housing scale exceeds infrastructure limits, with poor transport, overstretched services, and congestion.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Online	441	Online (OPUS)	Miss Catherine Adamson [441]	4417	N/A	Statutory Bodies	*AS28, CHR14, SR30 are proposed within 500 metres of our operational wastewater treatment works. *Agrees with the policy T34 in general terms, also note the acknowledgement of the agent of change principle in sections 13.4.5 and 13.4.6 , although considers any development within 500m of a WTW to be potentially 'sensitive' development. *Concern is that without being more specific, policy T34 may not be effective in mitigating all potential impacts to 'sensitive' development. *The agent of change principle applies to the new development and appropriate design and mitigation must be provided in the new development to ensure the ongoing viability of existing surrounding uses is not compromised. *Agrees with DM4 from the perspective of noise. However by restricting its scope to noise, DM4 precludes any other existing environmental conditions that may have an impact on any 'sensitive' future development.	Regulation 19 Consultation		Paragraph 15 - Chapter 12	Policy T34: Safeguarding of Existing Waste Management Facilities As the wastewater undertaker for Medway, Southern Water owns and operates wastewater treatment works (WTWs) within the district. Further to our representation at the Regulation 18 consultation for the Local Plan, we request the following wording is added to Policy T34 (or to Policy DM4): Requested changes: Development proposals in close proximity (within 500m) to wastewater treatment works should provide an odour assessment in consultation with Southern Water to determine if any mitigating measures are required. If any measures are identified, the applicant must demonstrate how these have been included within the proposed scheme. Alternatively wording could be added to the policies for sites AS28, CHR14, SR30 in the Local Plan, where these individual sites are located within 500m of WTWs: Sensitive development within 500m of a WTW should have an odour assessment carried out (in consultation with Southern Water) in order to agree the 1.5 OdU contour, within which no sensitive development should be located.	No	
Online	149	Online (OPUS)	Miss Christine Curtis [149]	4685	N/A	Members of the public	Support need for a Local Plan but do not support Policy SA6 and have serious concerns in other matters.	Regulation 19 Consultation		Paragraph 1			
Online	149	Online (OPUS)	Miss Christine Curtis [149]	4686	N/A	Members of the public	Concern reclassification of Green Belt to Gey Belt land is not transparent nor that all of brownfield sites have been explored and prioritised.	Regulation 19 Consultation		Paragraph 2			
Online	149	Online (OPUS)	Miss Christine Curtis [149]	4688	N/A	Members of the public	Has the housing need locally been really verified.?	Regulation 19 Consultation		Paragraph 4	Your councillors stock answer of 700 children in temporary accommodation means that any Social housing element of developments should be ring fenced for organisations, including yourself, providing social housing available for rent for those on the local waiting list. This would mean a great number of social housing properties on the scale of the old council estates. Is this really what our greenbelt is being sacrificed for? Planning should ensure that predatory London councils and other out of area social housing providers E.G. West Kent (who took the social housing proportion of Liberty Park Wainscott) do not take the social housing proportion from those local people waiting on your list.	No	

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Online	149	Online (OPUS)	Miss Christine Curtis [149]	4701	N/A	Members of the public	Concern over development at Strood and waste. High Halstow already have issues with drainage.	Regulation 19 Consultation		Paragraph 15 - Chapter 12	Upgrade for existing residents.	Yes	no
Online	1510	Online (OPUS)	Miss Danielle Johnstone [1510]	4386	N/A	Members of the Public	No reference to which site/area is referred to - concern over impact of development on environment, wildlife and landscape as well as generation of congestion and safety concern.	Regulation 19 Consultation		Paragraph 1	Construction would bring long-term noise, dust, and disruption, which would severely affect the well-being of nearby residents, especially families with young children and elderly individuals. In conclusion, I urge the planning committee to reject this proposal. The environmental damage, pressure on infrastructure, and the loss of valued green space far outweigh any perceived housing benefit.	No	
Online	1547	Online (OPUS)	Miss Ellie Smith [1547]	4454	N/A	Members of the Public	Housing being built without associated infrastructure.	6. Housing	6.2 Housing Mix	Policy T2: Housing Mix	You need to make sure that amenities such as doctors surgeries with spaces for new patients and schools with space for new pupils are being provided to those moving into the area. Hoo does not have those things and building more on the peninsula is irresponsible	Yes	The people of the peninsula will want to know that building will be halted until doctors schools and road infrastructure is improved upon
Online	1633	Online (OPUS)	Miss Francesca Fox [1633]	4844	N/A	Members of the Public	Strongly objects to Policy SA6, citing lack of transparency, harm to greenbelt, infrastructure strain, and biodiversity loss. Questions legality of grey belt classification and calls for publication of supporting evidence and meeting records.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Removal of all planned building work to preserve greenbelt/grey belt land. And prevent the destruction of Medway boundaries	Yes	If there is a proposed hearing session. It makes sense for someone who strongly opposes to take part
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4493	N/A	Members of the Public	Need for infrastructure first.	Regulation 19 Consultation		Paragraph 1			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4703	N/A	Members of the public	Need a plan to protect areas and improve others and plan for the future	Regulation 19 Consultation		Paragraph 1			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4704	N/A	Members of the public	Objects to Chatham Docks development	Regulation 19 Consultation		Paragraph 2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4705	N/A	Members of the public	Better assessment planning required overall	Regulation 19 Consultation		Paragraph 3			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4706	N/A	Members of the public	This version is ok	Regulation 19 Consultation		Paragraph 4			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4707	N/A	Members of the public	More is required for infrastructure especially in rural areas without increasing development /houses	Regulation 19 Consultation		Paragraph 5			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4708	N/A	Members of the public	Concern over chatham town centre and users of high street.	1. Overview	1.1 Introduction	Paragraph 1.1.1			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4709	N/A	Members of the public	Objects to development at Hoo Peninsula and wants upgrade infrastructure.	1. Overview	1.2 Medway area	Paragraph 1.2.1			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4710	N/A	Members of the public	Concerned single adults, people with motability issues and car users aren't considered.	1. Overview	1.2 Medway area	Paragraph 1.2.2	Better infrastructure especially on Hoo peninsula. Need additional road off the peninsula now for current residences. Need to look at current residents needs and improve their quality of life now. We need doctors, better roads, and no more development	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4711	N/A	Members of the public	Support no further development on Hoo peninsula and surrounding areas.	1. Overview	1.2 Medway area	Paragraph 1.2.6			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4712	N/A	Members of the public	Need another crossing and road off Hoo peninsula from Kingsnorth to the Strand.	1. Overview	1.2 Medway area	Paragraph 1.2.7			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4713	N/A	Members of the public	Objects to development at Allhallows, stoke, isle of grain and St Marys Hoo and Hoo with concern over lack of infrastructure.	1. Overview	1.2 Medway area	Paragraph 1.2.8			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4714	N/A	Members of the public	People want to be independent and go out of their area.	1. Overview	1.2 Medway area	Paragraph 1.2.9			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4715	N/A	Members of the public	Need more doctors and roads.	1. Overview	1.2 Medway area	Paragraph 1.2.10			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4716	N/A	Members of the public	Need plan in place to deter outlandish planning application.	1. Overview	1.2 Medway area	Paragraph1.2.11			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4717	N/A	Members of the public	Agree.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.4			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4718	N/A	Members of the public	Need to use brown field sites not farmer's field we need that for food.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4719	N/A	Members of the public	Don't agree with windfall site or others not in the Medway plan.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.6	Lower numbers on windfall sites etc.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4720	N/A	Members of the public	Buffer is not small enough and needs to be less.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.7	No buffer allowed.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4721	N/A	Members of the public	Requests more infrastructure now for Kingsnorth and Isle of Grain.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.8			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4722	N/A	Members of the public	Chatham especially needs cleaning up.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.9			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4723	N/A	Members of the public	Agree.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4724	N/A	Members of the public	Need better roads in the area first.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4725	N/A	Members of the public	Need infrastructure and easy access parking.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 2: Supporting people to lead healthy lives and strengthening our communities			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4726	N/A	Members of the public	Need bungalows and for single adults.	6. Housing	6.2 Housing mix	Paragraph 6.2.1			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4727	N/A	Members of the public	But better roads into them are required.	6. Housing	6.6 Mobile home parks	Paragraph 6.6.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4728	N/A	Members of the public	Need a plan in place.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.1			

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Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4729	N/A	Members of the public	Agree.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4730	N/A	Members of the public	Chatham needs to be updated, can't walk safely in high street.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4731	N/A	Members of the public	Agree.	14. Site Allocations	14.4 Gillingham District Centre	Policy SA3: Gillingham District Centre			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4732	N/A	Members of the public	Chatham docks should not be developed.	14. Site Allocations	14.3 Heritage-led sites	Policy SA2: Heritage-led Sites			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4733	N/A	Members of the public	1 and put bridge or tunnel over to Kingsnorth.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4734	N/A	Members of the public	Suggests widening Wainscott bypass to increase traffic capacity due to developing land west of Strood.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Major infrastructure needs before houses.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4735	N/A	Members of the public	Too much development no infrastructure in place to cope.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.1	Need more doctors, road improvements.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4736	N/A	Members of the public	Need better roads and doctors.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4737	N/A	Members of the public	Concern raised about people with mobility needs who cannot use public services, walk or ride a bike.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.5	Road across is key.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4738	N/A	Members of the public	Need a bridge or tunnel over to Strand from Kingsnorth.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.6			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4739	N/A	Members of the public	Infrastructure needed but no more houses.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.7			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4740	N/A	Members of the public	Need to keep separate villages.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.8			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4741	N/A	Members of the public	Less houses needed.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4742	N/A	Members of the public	Too many homes to be built.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Less homes more infrastructure.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4743	N/A	Members of the public	Services are limited.	14. Site Allocations	14.12 Rural Settlements	Paragraph 14.12.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4744	N/A	Members of the public	Not enough capacity to develop area.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Roads and services need to improve.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4745	N/A	Members of the public	Rural areas need to stay that way.	14. Site Allocations	14.12 Rural Settlements	Paragraph 14.12.1	No development of houses.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4746	N/A	Members of the public	Agree services are lacking and need improvement.	14. Site Allocations	14.12 Rural Settlements	Paragraph 14.12.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4747	N/A	Members of the public	Villages can't support further development.	14. Site Allocations	14.12 Rural Settlements	Paragraph 14.12.4	No more houses need roads and doctors.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4748	N/A	Members of the public	These sites cant sustain development.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	No house to be built.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4749	N/A	Members of the public	Too over developed.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Less houses more infrastructure.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4750	N/A	Members of the public	Need to improve road.	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15.9			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4751	N/A	Members of the public	But roads need improvement.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4752	N/A	Members of the public	Increase choice of travel mode and do not restrict use of car.	9. Transport	9.1 Vision for access and movement in Medwav	Paragraph 9.1.1	More car friendly.	No	
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4753	N/A	Members of the public	Great idea need another crossing from Kingsnorth to Strand.	9. Transport	9.1 Vision for access and movement in Medwav	Paragraph 9.1.2			
Online	1219	Online (OPUS)	Miss Jackie Forrest [1219]	4754	N/A	Members of the public	Emphasises car usage necessity, particularly in rural areas.	9. Transport	9.1 Vision for Access and movement in Medwav		Improve road infrastructure.	No	
Online	1563	Online (OPUS)	Miss Sarah Oatley [1563]	4969	N/A	Members of the Public	Objection to growth plan - lack of infrastructure, allocation in greenbelt, impact on environment/wildlife, loss of agricultural land.	Regulation 19 Consultation		Paragraph 1	The plan should no longer go ahead !	No	
Email	E.86	File U	MMO Marine Planning	SDLP 311	N/A	Statutory Bodies	The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.	4. Natural Environment	4.8 Flood and water management				
Email	E.86	File U	MMO Marine Planning	SDLP 312	N/A	Statutory Bodies	The inspector may seek reference to the South East Marine Plan, they may also seek reference to the requirement for decision makers, such as yourselves, to take the marine policy statement and marine plans into account under the Marine and Coastal Access Act 2009.	4. Natural Environment	4.8 Flood and water management		Suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information - South East Marine Plan and Explore Marine Plans.		

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Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1687	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1688	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1689	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1690	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1691	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1692	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1693	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.40	File Q	Mr & Mrs Hooker	SDLP 1694	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.195	File M	Mr & Mrs RM Gollay	SDLP 1287	N/A	Members of the Public	Recommends stronger, explicit adaptive measures within site allocation policies to increase development resilience to climate risks.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.21	File L	Mr & Mrs Tanner	SDLP 57	N/A	Members of the Public	Object to this policy. Concern over infrastructure, particularly traffic impact	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		No	
Email	E.21	File L	Mr & Mrs Tanner	SDLP 58	N/A	Members of the Public	Object to the policy, concern over levels of traffic and impact on roads	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		No	
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1432	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1433	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1434	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1435	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1436	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1437	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1438	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1439	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.14	File Q	Mr & Mrs Thomson	SDLP 1440	N/A	Members of the Public	Need for more GP services, school spaces and employment opportunities for locals	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Online	1534	Online (OPUS)	Mr Aaron Danes [1534]	4432	N/A	Members of the Public	Objection. Under suggested changes - supports housing but concern over supporting infrastructure.	Regulation 19 Consultation		Paragraph 1	The need for homes is a must but you need to think of maybe updating the hospital as well as the infrastructure around the water supply we are all currently facing within Medway. high water bills for outdated pipe work	No	
Online	1534	Online (OPUS)	Mr Aaron Danes [1534]	4433	N/A	Members of the Public	Support for good evidence base	Regulation 19 Consultation		Paragraph 3			
Online	647	Online (OPUS)	Mr Alan Stockey [647]	4947	N/A	Members of the Public	Concern raised over lack of air quality assessment and Equalities Impact Assessment. Concern raised in connection to Rainham allocation and impact on health and heritage.	Regulation 19 Consultation		Paragraph 4	It needs to be informed by an air quality assessment and an equalities impact assessment, so that the true victims of this plan can be determined - the council is negligent in not doing so and the inspector cannot be informed without this information	No	

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Online	724	Online (OPUS)	Mr Alastair Blair [724]	4336	N/A	Members of the Public	Existing and proposed provision of health amenities are insufficient. Local health system is overloaded.	Regulation 19 Consultation		Paragraph 13-Chapter 10	Plan for a new hospital.	No	
Online	724	Online (OPUS)	Mr Alastair Blair [724]	4337	N/A	Members of the Public	The housing proposals overlook the need for improved infrastructure. Developers avoid investing in infrastructure due to the associated costs. Over reliance on existing roads. Lidsing, Gibraltar Farm, Mill Fields, and East Hill lack a coordinated plan and continued dependence on current road networks is likely to result in severe congestion.	Regulation 19 Consultation		Paragraph 9 - Chapter 6	If the plan is to proceed a much more integrated road, bus pedestrian and cycle proposal is necessary. Not wishywaschy inclusions.	No	
Email	E.125	File C	Mr and Mrs R Goatham	SDLP 687	Bloomfields (Thomas Ogden)	Developers or Agents	Support the recognition that Hoo could actively contribute to a well-planned and strategic community. The site at 1 Ropers Cottage actively supports this intention	3. Spatial Development Strategy					
Email	E.125	File C	Mr and Mrs R Goatham	SDLP 688	Bloomfields (Thomas Ogden)	Developers or Agents	This representation seeks to promote 0.8 hectares of land on the north eastern side of Hoo -the site is well located, in a sustainable location, supports good connections to existing and proposed bus links, pedestrian and cycle paths. No known constraints that would prevent development of the site and the site is available	14. Site Allocations					
Online	1518	Online (OPUS)	Mr Andrew Jones [1518]	4389	N/A	Members of the Public	Non compliance, insufficient engagement of cross boundary issues, non compliance on Reg 18 and 19, non-compliance with NPPF, insufficient evidence - infrastructure, delivery monitoring	5. Built Environment	5.1 Introduction	Paragraph 5.1.1	The plan needs to minimise development to protect grade 1 farmlands. It needs to reduce impact on wildlife and existing residents that have suffered for far too long.	Yes	Protection of the area and way of life
Online	1508	Online (OPUS)	Mr Andrew Millar [1508]	4363	N/A	Members of the Public	Is sceptical of climate change and does not believe anything can be done to affect CO2 levels or climate in Medway or UK.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.2	Remove all attempts to change the climate, remove net zero Focus on immediate environmental protection instead.	No	
Online	1501	Online (OPUS)	Mr Anthony Barry Arnold [1501]	4350	N/A	Members of the Public	Supports accommodation provision for older persons/Changes - proportion of older persons accommodation on each development.	6. Housing	6.2 Housing mix	Paragraph 6.2.1			
Online	1501	Online (OPUS)	Mr Anthony Barry Arnold [1501]	4351	N/A	Members of the Public	Request for prioritisation of affordable housing for local people.	6. Housing	6.3 Affordable housing	Paragraph 6.3.1			
Online	1501	Online (OPUS)	Mr Anthony Barry Arnold [1501]	4352	N/A	Members of the Public	Older person highlighting different needs of older persons and those with disabilities. Suggestive of need for choice.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Paragraph 6.4.2			
Online	1501	Online (OPUS)	Mr Anthony Barry Arnold [1501]	4353	N/A	Members of the Public	Support for greater control of HMOs via licensing.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.6			
Online	961	Online (OPUS)	Mr Awad Chishty [961]	4666	N/A	Members of the Public	Oppose Chatham Docks Development which undermines Council's objective to secure jobs and develop skills.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	The local plan should retain Chatham Docks as an operational port, protecting 800+ skilled jobs and a vital industrial hub. Replacing it with mixed-use development risks creating more empty commercial units while destroying livelihoods. No proper explanation or alternatives have been provided, and redevelopment would permanently remove unique carbon-efficient water freight capabilities. This is inconsistent with the plan's objective to secure jobs and develop skills. These omissions mean the draft Local Plan is unsound and fails legal requirements. A hybrid approach, modernising the docks alongside complementary commercial activity, should be considered, supported by an independent economic impact assessment.	No	
Online	1500	Online (OPUS)	Mr Brian Bastick [1500]	4349	N/A	Members of the Public	Void (see later submission)	1. Overview	1.2 Medway area	Paragraph 1.2.1			
Online	740	Online (OPUS)	Mr Bryan Fowler [740]	5014	N/A	Members of the Public	Chatham and Gillingham need a proactive retail strategy beyond place hierarchy. Designated parking must support retail growth. Medway Council's car park sell-offs risk future capacity as town centre populations rise	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy			
Online	740	Online (OPUS)	Mr Bryan Fowler [740]	5016	N/A	Members of the Public	Mention in the local plan should include the newly created Intra Marine Trust and the importance of the river and its piers as part of this area's heritage	5. Built Environment	5.9 Star Hill to Sun Pier	Paragraph 5.9.2			
Online	1555	Online (OPUS)	Mr Colin Dutton [1555]	4459	N/A	Members of the Public	Hoo's growth has outpaced population needs, threatening farmland, overburdening infrastructure, and risking its semi-rural identity by pushing unnecessary expansion and strain on roads and healthcare services.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Reduction in allocated housing. Keep more greenfield sites. Improve road network Improve other infrastructure, i.e. doctors, schools Spread future development more fairly across Medway Keep Hoo semi rural	No	

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Online	1546	Online (OPUS)	Mr Colin Farndale [1546]	4453	N/A	Members of the Public	Opposing Allocation/Policy SA6. Due to use of brownfield land, loss of greenbelt, impact on infrastructure - roads, health, education, environmental impact, health impact, quality of life, lack of transparency/public accountability in terms of greenbelt review, site selection process.	Regulation 19 Consultation		Paragraph 1	I am writing as a resident of Strood to broadly support the principle of adopting a new Local Plan for Medway—it's long overdue, and strategic planning is essential for our area. However, I strongly oppose specific elements of the plan, particularly Policy SA6 (Strood West), for the following reasons: 1. Failure to Follow a Brownfield-First Strategy The Local Plan falls short of prioritising brownfield redevelopment, despite national policy guidance and local expectations. Strood and Medway contain numerous underused or derelict industrial and urban sites that should be developed first. Sacrificing Green Belt land, particularly in Strood West, undermines sustainable planning. 2. Green Belt Erosion Without Justification The proposal represents a significant policy shift regarding Green Belt land, yet this is not clearly presented to the public. According to the National Planning Policy Framework (NPPF), changes to Green Belt boundaries should only occur under exceptional circumstances—none of which have been adequately demonstrated here. The use of the term “Grey Belt” to downplay the environmental and agricultural value of the land is misleading. This is not a recognised planning category, and there is no clear evidence justifying the claim that the land is “low quality.” In fact, much of the area has been farmed	No	
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4977	N/A	Members of the Public	Concern over development in Capstone Valley and opposes this development.	1. Overview	1.2 Medway area	Paragraph 1.2.2			
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4979	N/A	Members of the Public	Concern over negative impact of development on environment and loss of green space.	1. Overview	1.2 Medway area	Paragraph 1.2.4			
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4982	N/A	Members of the Public	Concern over impact of planned growth on health, loss of countryside and woodland.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable and green future			
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4986	N/A	Members of the Public	Concern over loss on natural spaces/countryside via housing development. Querying need for housing locally.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 2: Supporting people to lead healthy lives and strengthening our communities			
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4988	N/A	Members of the Public	Concern over impact of development and loss of green spaces in Capstone Valley. Impact on air quality etc.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3			
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4992	N/A	Members of the Public	Against development in Capstone Valley - concern over impact of health, air quality.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.5	Do not build more in Capstone and surrounding countryside all the way up to Lidsing. You want people to have areas to walk, cycle and be healthy. This area has the cleanest air and the prettiest countryside left in Medway. It is the perfect area for providing for our health and leisure. We always use it for that purpose. Removing this from us is like building a housing estate over Central Park in New York. Once you fill it, the countryside is gone! Please do not make this awful decision. How about reforestation, making new paths and exercise areas here. Invest - turn in into a business for health and	No	
Online	899	Online (OPUS)	Mr Craig Grindley [899]	4993	N/A	Members of the Public	Against loss of countryside. Prefers development on flat parts of Medway rather than hilly areas.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.6			
Online	1503	Online (OPUS)	Mr Darren Lucas [1503]	4354	N/A	Members of the Public	Concern over Green Belt / Grey belt policy, change from Regulation 18, and brought forward prematurely before Gravesham BC Green Belt policy agreed. Does not agree with Grey belt designation West of Strood and concern with impact of development on increase to the size of Strood. Concern also raised that a high-level masterplan does not appear in the evidence base documents.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 19	No building on Strood/Gravesham green belt.	Yes	Local voice
Online	1647	Online (OPUS)	Mr Darren Smith [1647]	4919	N/A	Members of the Public	Frequent 191 bus user. Poor service when road is congested. Corporation Street bus lane helps. Request more corridors for efficient transit.	9. Transport	9.1 Vision for Access and movement in Medway				
Online	1647	Online (OPUS)	Mr Darren Smith [1647]	4920	N/A	Members of the Public	Medway's housing plans risk worsening sewage discharge into rivers. A new project should adopt separate sewage and water systems to prevent pollution. This is a vital opportunity for greener infrastructure.	4. Natural Environment	4.8 Flood and water management	Paragraphs 4.8.11 to 4.8.13 (Wastewater)			

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Online	1584	Online (OPUS)	Mr David Charlesworth [1584]	4560	N/A	Members of the Public	No proof to support unacceptable greenbelt land reclassification to grey belt. This is class A greenbelt farming land and home to much wildlife. Schools, hospital, GP and infrastructure needs not met. Natural boundary between districts - building on this would add strain to the already struggling communities, services, roads and wildlife.	Regulation 19 Consultation		Paragraph 1	No building on GREENBELT	Yes	Local residents should be involved in all consultations and hearings.
Online	1472	Online (OPUS)	Mr David Hillery [1472]	4329	N/A	Members of the Public	Concern over obstruction to views and 'setting'.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.9	Pump Lane cannot be the main thoroughfare. Traffic should be routed from Lower Rainham Road where it will have far less impact on the existing residents of Pump Lane. There should be an additional buffer zone protecting the existing residents from the development (why only Lower Twydall?) There is plenty of space in the fields between Pump Lane and Lower Twydall Lane - why does everything have to be crammed around the existing residents? There is brownfield land on this site (area filled in from historic brick field excavations). Why destroy farmland but	Yes	My family's home life stands to significantly adversely affected should these proposals be approved.
Online	1653	Online (OPUS)	Mr David Hillery [1653]	4943	N/A	Members of the Public	Opposed to Pump Lane allocation, notes lower housing number but believes impact will be greater. Believes allocation is not legally compliant and Dtc failure.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 21	There should be a significant buffer of planted trees between the development and the existing housing on Pump Lane and Russett Farm (this formed part of the rejected plan five years ago) Access to the development should be from Lower Rainham Road only. Pump Lane should be made safe for pedestrians The trackway to Pump Farm should not be the main route into the development.	Yes	In light of the failure to consult, I would like an opportunity to engage
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4656	N/A	Members of the Public	I broadly support the draft plan, but it does need to take into account the need to provide supporting living accommodation for younger people with disabilities, especially autism	1. Overview	1.1 Introduction	Paragraph 1.1.1			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4657	N/A	Members of the Public	I support the plan, but it must include adequate provision for allotments, parks and gardens.	4. Natural Environment	4.1 Introduction	Paragraph 4.1.1			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4659	N/A	Members of the Public	Support this ambition.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.18			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4661	N/A	Members of the Public	Support but it does need to include supported living accommodation for younger, disabled people.	6. Housing	6.2 Housing Mix	Policy T2: Housing Mix			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4662	N/A	Members of the Public	we need to make sure more people can afford their own homes.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4663	N/A	Members of the Public	We need to make sure younger disabled people also have supported living opportunities	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Paragraph 6.4.4			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4664	N/A	Members of the Public	Support	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Online	1606	Online (OPUS)	Mr David Hopkins [1606]	4665	N/A	Members of the Public	Support - we particularly need to improve walking, cycling and bus routes. Also, could there be a River Medway waterbus service?	9. Transport	9.1 Vision for access and movement in Medway	Paragraph 9.1.1			
Online	1575	Online (OPUS)	Mr David Park [1575]	4536	N/A	Members of the Public	Concern raised over impact of Land West of Strood allocation and ability to deliver site. Concern over proximity and gas and oil lines.	6. Housing	6.1 Introduction	Paragraph 6.1.2	The access roads need closer inspection and a traffic count taken on the surrounding roads to confirm the viability or otherwise of them carrying increased traffic. As each phase of the proposed development is completed, no further development should be permitted until the previous phase is fully occupied.	No	
Online	1611	Online (OPUS)	Mr Duncan Cawte [1611]	4700	N/A	Members of the public	Proposed housing levels are unrealistic due to lack of infrastructure. Land use inappropriate for housing on Chatham Docks site.	Regulation 19 Consultation		Paragraph 3	The plan needs to consider and calculate what the current and future infrastructure requirements of the Medway Towns are. This includes health (including environmental and recreational infrastructure that contributes to wellbeing and good mental health), educational, and transport infrastructure. Housing development plans should then predicated upon this, and not the other way round.	No	
Online	1483	Online (OPUS)	Mr Edward Butcher [1483]	4343	N/A	Members of the Public	Concern over loss of green belt/agricultural land and its effects (including air pollution), particularly at Chapter Farm.	6. Housing	6.1 Introduction	Paragraph 6.1.1	Build on land that is not green belt, there's plenty of other areas that are not as important than any A1 arable land you've chosen.	yes	Face to face is always best
Online	1530	Online (OPUS)	Mr Glenn Chambers [1530]	4416	N/A	Members of the Public	Strood won't be able to cope with the infrastructure as it's already saturated. Residents don't need anymore developments. No one has explained why they need to build.	Regulation 19 Consultation		Paragraph 1	There shouldn't be a plan. You are ruining the local countryside. No more house need to be built. Hop and Cliffe are already causing terrible traffic problems	No	
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4364	N/A	Members of the Public	Support the building of homes but concerned about supporting infrastructure, most notably roads and waste water removal.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.6	In the plan I'd like to see as part of this a "by pass" around the heritage part of the Lower Rainham road. Essentially a new road linking bottom of Pump Lane with bottom of Bloors Lane bypassing the single file traffic lights. It would significantly benefit road links in the area and could be incorporated in the final plans for the new development without much loss of land, especially given the reduction in houses now planned. Water collection and slow release barriers etc. need to be incorporated to try to minimise additional flooding issues in the area.	No	
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4365	N/A	Members of the Public	I think this is a vital part of these developments and as outlined here must be built early in the development.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.6			

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Online	865	Online (OPUS)	Mr Graham Hunt [865]	4366	N/A	Members of the Public	I support that development through this area needs to be better co-ordinated and planned. The Darland Banks is a vital green space that needs to be preserved and not overly affected by developments	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.2			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4367	N/A	Members of the Public	I support this - providing the additional traffic does not have knock on problems on the approach to Junction 4 from Rainham/Parkwood and the flow of traffic on the M2. Ideally the M2 should be increased to 3 lane width between J4 and J5 if not to J7	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.3			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4368	N/A	Members of the Public	I broadly support this strategy (S10). However I feel since the 1980s Medway has consistently talked about attracting good office jobs to the area and has failed. I worked nearly my entire career commuting from Medway to find suitable employments in IT services etc	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4369	N/A	Members of the Public	Broadly supports this policy (T12). However has concern higher education availability decline unless we focus in more specific policy and action.	7. Economic Development	7.5 Learning and skills development	Policy T12: Learning and skills development			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4370	N/A	Members of the Public	Support for policy, preserve Grade 1 land, improve roads for agriculture	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4371	N/A	Members of the Public	Support for policy, need for local transport, concern about congestion at Dockyard river tunnel with development	9. Transport	9.1 Vision for Access and movement in Medway				
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4372	N/A	Members of the Public	Support reinstatement of Grain branch line to meet transport need	9. Transport	9.4 Grain branch	Policy DM17: Grain Branch			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4373	N/A	Members of the Public	Querying promotion /encouragement of e-bikes/e-scooters in policy due to legality issues of their use. Queries legality of policy.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Removal of e-scooters from the policy statement.	No	
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4374	N/A	Members of the Public	Supports principle of policy with exception of legal point about e-scooters. More intervention to discourage use of private cars for school drop off	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4375	N/A	Members of the Public	Need travel plan for Medway to address current issues, A2 upgrades essential to ease congestion, especially considering problems in Rainham during M2 closures and operation brook	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4376	N/A	Members of the Public	Doesn't believe encouragement of e-bikes/e-scooters is legal	9. Transport	9.12 Parking	Policy DM20: Cycle Parking and storage	Remove the reference to e-scooters in the policy.	No	
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4377	N/A	Members of the Public	Broadly supports the policy but expresses concern over a lack of visible delivery of offsite infrastructure following developments. Notes that roads are rarely improved, congestion at junctions worsens and little new health provision. Recent flooding and reduced defences in the Miers Court area are also highlighted.	10. Health, Communities and Infrastructure	10.5 Infrastructure Delivery	Policy S24: Infrastructure Delivery			
Online	865	Online (OPUS)	Mr Graham Hunt [865]	4378	N/A	Members of the Public	Policy amendment to say " will be encouraged" with the council taking an active promotion role in identifying potential schemes.	13. Energy	13.2 Energy Supply	Policy S25: Energy Supply	I'd like to see this policy strengthened to say "... will be encouraged"		
Online	1658	Online (OPUS)	Mr H Fitzpatrick [1658]	4970	N/A	Members of the Public	Property owner requesting direct consultation in connection to disused Gillingham Dockyard railway line which crosses consultees property.	Regulation 19 Consultation		Paragraph 7 - Chapter 4	As a landowner of the area in question, I would like to be involved in the planning and public consultation/support processes. I request to be in direct consultation on how the plans impact my property	Yes	Plans to access the disused Gillingham Dockyard railway line cross my property. I request to be in direct consultation on how the plans impact my property.
Online	1658	Online (OPUS)	Mr H Fitzpatrick [1658]	4971	N/A	Members of the Public	Property owner requesting direct consultation in connection to disused Gillingham Dockyard railway line which crosses consultees property.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.5	Please see previous comments.	Yes	Plans to access the disused Gillingham Dockyard railway line cross my property. I request to be in direct consultation on how the plans impact my property.

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Online	1658	Online (OPUS)	Mr H Fitzpatrick [1658]	4973	N/A	Members of the Public	Property owner requesting direct consultation in connection to disused Gillingham Dockyard railway line which crosses consultees property.	14. Site Allocations	14.5 River Waterfront	Paragraph 14.5.2	I request to be in direct consultation on how the plans impact my property and raise local support for the changes.	Yes	Plans to access the disused Gillingham Dockyard railway line cross my property (Land adjacent to, and Land to the East of Devonshire Road, ME7) I request to be in direct consultation on how the plans impact my property.
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 247	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Support with some constructive comments	1. Overview				Yes	The Landowner reserves the right to participate in the relevant hearing sessions at the Examination in public
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 248	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Support.	2. Vision and Strategic Objectives					
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 249	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Support and raises the following matters: * places pressure on urban areas * Potential delays in delivering brownfield sites could harm LP 5 year land supply * the approach downplays greenfield sites contributions in meeting targets. ~~*Include HHH40~~	3. Spatial Development Strategy					
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 250	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Suggests new policy for windfalls	6. Housing			Include a policy on windfalls. This should state that windfall sites should be sustainably located within or on the edge of settlement boundaries. A settlement hierarchy would help support the delivery of windfall in the most appropriate locations		
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 251	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Support	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders			
Email	E.60	File B	Mr HG and Mrs DR Kemsley	SDLP 252	Lee Evans Partnership LLP (Phillip Ivory)	Developers or Agents	Site HHH40: * proximity to SSSI should not stop site coming forward for development, i.e. it can be designed. Other sites in close proximity are not assessed in the same way. Apply a consistent approach. * Grade 3 agricultural land which is not being farmed should not stop it from being allocated. Apply consistent approach * Not considered to contribute to coalescence * the site is within walking distance of existing facilities	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Online	1615	Online (OPUS)	Mr Ian Thompson [1615]	4800	N/A	Members of the Public	The Standard Method has been heavily criticised for using significantly higher population growth estimates and does not adequately account for the current housing density in Medway. Suggests building on areas that have been ~~allowed to keep their semi-rural environment~~	6. Housing	6.1 Introduction	Paragraph 6.1.2	1. Medway should be challenging it's housing target and putting forward one that improves the lives of its current residents rather than one that supports an over estimated imaginary future population.	No	
Online	1615	Online (OPUS)	Mr Ian Thompson [1615]	4801	N/A	Members of the Public	Concerned about development in Rainham, particularly loss of green spaces, traffic, air quality, wildlife and diversity.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	The whole scheme needs to be scrapped and the orchards protected either as commercial orchards or as a community space.	No	
Online	1626	Online (OPUS)	Mr James Broom [1626]	4823	N/A	Members of the Public	Strongly objects to climate change measures.	1. Overview	1.2 Medway area	Paragraph 1.2.5	Climate change is not real. We account for NOTHING in global terms. I reject ALL measures that promote this agenda or place any importance on it. [REDACTED]	Yes	Climate change is not real. We account for NOTHING in global terms. I reject ALL measures that promote this agenda or place any importance on it. [REDACTED]
Online	1659	Online (OPUS)	Mr James Winder [1659]	4975	N/A	Members of the Public	Concern raised when comparing Medway draft Local Plan to other LPAs in the South East. Querying lack of ambition and detail. Suggests that the Medway plan risks exposing residents to poor built and natural environment risking poor health outcomes etc.	1. Overview	1.2 Medway area	Paragraph 1.2.4	A fair and future-proof Medway plan should give its residents the same procedural tools, design protections, and targeted anti-deprivation measures that other counties already consider essential. Anything less entrenches an unacceptable regional inequality in quality of life.	No	
Online	1137	Online (OPUS)	Mr Jason Tillman [1137]	4509	N/A	Members of the Public	The local plan needs greater emphasis on green corridors linking green spaces.	4. Natural Environment	4.5 Landscape protection and enhancement	Paragraph 4.5.13	A wildlife corridor is a strip of natural habitat that connects separate populations of wildlife across fragmented landscapes. It allows animals to move safely between different habitats. Animals need to roam for food, mates, or seasonal changes. Genetic diversity connects populations and reduces inbreeding. Species can move as conditions change ensuring climate resilience. Corridors help animals bypass roads, towns, or farmland.	Yes	It is essential that the plan minimises impact on the environment and maximises biodiversity for future generations. It is democratic to involve all concerned stakeholders in the

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Online	1137	Online (OPUS)	Mr Jason Tillman [1137]	4510	N/A	Members of the Public	Support for sustainable growth but concern over impact of development on Rede Common in relation to wildlife.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	There needs to be a complete reconsideration of the development on this green belt which is a vital wildlife link to Rede Common. A wildlife corridor is a strip of natural habitat that connects otherwise isolated populations, allowing wildlife to move safely across fragmented landscapes. The policy document refers repeatedly to a "linkage to greenspace", yet provides no clear definition or detail.	Yes	We therefore call on Medway Council and its planning officers to: • Provide clarity on the meaning and implementation of "linkage to greenspace" within Policy SA6 • Include a formal commitment to a designated wildlife corridor between Rede Common and Green Belt land to the north and northwest • Engage with local ecological and community stakeholders, including Friends of Rede Common, to shape this provision meaningfully.
Online	1588	Online (OPUS)	Mr John Kay [1588]	4683	N/A	Members of the public	Criticises lack of public consultation on Greenbelt review and warns of urban sprawl between Medway and Gravesham. Mentions national guidance states that for land to become grey belt it should have been previously developed.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.1	The Local plan to develop the area of Strood West, which is currently Chapter Farm, needs to be halted. The land in question should be officially re-designated as Green Belt and the process to change to grey belt should begin again with complete transparency and proper public consultation with all residents who could be impacted by this included in this process.	Yes	To observe the transparency of the process.
Online	1588	Online (OPUS)	Mr John Kay [1588]	4684	N/A	Members of the public	Objects to green belt reclassification without consultation; cites congestion, NHS strain, and health risks.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	The land should be re-designated as green belt until a proper public consultation has taken place. The urban sprawl impact on green belt should be re-considered as joining Medway to Kent creates a virtual corridor to London. To re-evaluate the current road system as it is barely adequate for the amount of normal traffic with any incident on the major roads surrounding the area causing massive congestion impacting on people's wellbeing. Re-consider the effect of the growth in population on the current NHS situation. Take into account the impact on the quality of life of local residents who will be affected by the extended construction taking place. 10 years is a long time to be living with this on	No	
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4687	N/A	Members of the public	Given potential effects of global warming, I would hope that new housing will include solar panels and possibly heat pumps as standard.	1. Overview	1.2 Medway area	Paragraph 1.2.4			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4689	N/A	Members of the public	This is a difficult problem, allowing more house building but not encroaching on farmland and avoiding flood plain land.	1. Overview	1.2 Medway area	Paragraph 1.2.6			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4690	N/A	Members of the public	Please give consideration to improving the bus service as regards to arrival accuracy.	1. Overview	1.2 Medway area	Paragraph 1.2.7			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4691	N/A	Members of the public	Is there any chance of trying to re-occupy empty properties? Empty property tax in such cases should be removed.	1. Overview	1.2 Medway area	Paragraph 1.2.8			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4692	N/A	Members of the public	Any successful plans to increase the viability of high streets is to be applauded. However, we do not need more charity shops, fried chicken shops, hairdressers/barbers or nail shops.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.9			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4694	N/A	Members of the public	I would hope that consideration has been given to rising sea levels. Global warming, causing ice to melt, suggests that by 2100 sea levels are expected to rise by 300mm. Would it be possible to provide an areas at risk map?	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable and green future			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4696	N/A	Members of the public	Warns of climate change impacts and impacts on farmland. Farmland will be affected which should not be built on, calls for sustainable building standards - 'Future Homes Standard'	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable and green future			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4697	N/A	Members of the public	Argues that development should be focused on urban brownfield sites and criticises rural expansion; calls for inclusion of homeless people in housing plans.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 2: Supporting people to lead healthy lives and strengthening our communities			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4698	N/A	Members of the public	Bringing brown field sites back into use, although likely to be more expensive for developers, is surely the best approach.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3			
Online	661	Online (OPUS)	Mr Keith Harrison [661]	4699	N/A	Members of the public	Not against some construction in the area, but be mindful to avoid flood plain and flora and fauna habitation.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.6	I'm not against some construction in the area, but please be mindful to avoid flood plain land and flora and fauna habitation.	No	

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Online	661	Online (OPUS)	Mr Keith Harrison [661]	4702	N/A	Members of the public	Notes poor recycling practices among residents and suggests fines for non-compliance.	12. Waste Management	12.2 Future management of waste in Medway	Vision for Waste Management			
Online	1648	Online (OPUS)	Mr Kevin Boyd [1648]	4934	N/A	Members of the Public	Important to have proper planning taking in residents needs and considering the environmental impacts on the areas selected	Regulation 19 Consultation		Paragraph 1			
Online	1648	Online (OPUS)	Mr Kevin Boyd [1648]	4935	N/A	Members of the Public	Objection to use of greenbelt.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3			
Online	1648	Online (OPUS)	Mr Kevin Boyd [1648]	4937	N/A	Members of the Public	Objection to use of greenbelt. Need to preserve food production.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.5	Build on brownfield sites. There are plenty still to be utilised.	Yes	Greenbelt should not used for this plan nor should it be subject to change of use to suit the plan. It is currently farmed and we are short of being able to feed the population without costly imports with high
Online	1648	Online (OPUS)	Mr Kevin Boyd [1648]	4938	N/A	Members of the Public	Land currently being farmed should remain greenbelt.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.9	Keep farmed areas as Greenbelt.	Yes	You are changing classification to suit your plan. Outrageous abuse of position by the council based on economic needs to have more houses paying into the
Online	1648	Online (OPUS)	Mr Kevin Boyd [1648]	4941	N/A	Members of the Public	Concern raised over water supply and need for reservoirs.	4. Natural Environment	4.2 Planning for climate change	Paragraph 4.2.8	Larger reserves of water need to be made available with the expansion in demand	Yes	No consideration into building facilities to store water as demand will spiral with the development in the area
Email	E.150	File E	Mr Kevin Rice	SDLP 847	DHA (Seth Tyler)	Developers or Agents	Supportive of the objective of Policy SA13. Welcome an initial phase however have concern that the concept plan lacks detail which is needed to guide the overall design of the Opportunity Area. Unclear which sites form the initial phase, suggest this is clarified with revised policy wording or identifying specific areas within the concept plan for delivery during the proposed plan period. Suggested wording given. Concern also over the fragmented land ownership in MCE and timescales for the Frindsbury Peninsula Planning Framework. Suggests bringing forward the framework to earlier in the plan period.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	Suggests that the Frindsbury Peninsula Planning Framework be brought forward earlier in the plan period. Suggested amended wording for Policy SA13: Objective An initial phase of development will be delivered in the latter part of the plan period, following the managed release and relocation of some existing businesses, providing a catalyst for a landmark mixed-use regeneration area extending beyond the plan period. Criteria An initial phase of development of up to 690 [Add: 1, 200] new homes within the plan period as part of a large-scale, mixed-use regeneration area. 1. i. [Add: To ensure a continuous supply of housing throughout the plan period, the Council will support an early phase delivery of] an initial phase [Add: of residential lead mixed use development which can include Sites SR30, SR31 and SR37 and other sites within the residential area of the Concept Plan independent of the Frindsbury Peninsula Planning Framework provided that: The proposals provide appropriate Flood Risk Mitigation Strategy in accordance with Policy DM1 the Environment Agency Guidance; and The phase of development accords with the Council's initial Concept Plan and the proposals will not jeopardise future opportunities identified on the Frindsbury Peninsula Concept Plan.] ii. The planning application(s) for an initial phase of development will [Add: can] be guided by the Frindsbury Peninsula Planning Framework [Add: following its adoption]. 2. The requirements in policies S2 and S3 must be applied,	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 848	DHA (Seth Tyler)	Developers or Agents	No objection in principle is raised, however the wording of policy DM5 should be amended. The requirement for "dementia friendly standards" is not specific and is already included in Policy T4. Suggests deleting third bullet point regarding dementia friendly standards.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design	Suggests deleting third bullet point regarding dementia friendly standards.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.

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Email	E.150	File E	Mr Kevin Rice	SDLP 849	DHA (Seth Tyler)	Developers or Agents	No objection to the principle of Policy DM6 is raised, however bullet point 6 is already covered by Policy S1 and should therefore be removed and not repeated. Furthermore, this is also now superseded by Building Regulations.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Suggests deleting sixth bullet point regarding addressing the climate emergency.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 850	DHA (Seth Tyler)	Developers or Agents	There is no clear rationale for singling out Conservation Areas over higher-significance heritage assets (e.g., Scheduled Ancient Monuments) for submission of full application. The blanket requirement is onerous, risks delaying development, and fails to consider each site's individual impact. Recommend removing the mandatory full-application rule for Conservation Areas and assess each case on its own merits, invoking Article 5(2) GDMP Order 2015 only where justified.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets		Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 851	DHA (Seth Tyler)	Developers or Agents	This policy does not define "materially lower", suggest redrafting the policy to define it so applicants and decision-makers know what benchmark to apply. Also suggest updating the IDP or an accompanying technical note to cross-reference this policy, explain how the vehicle trip credit is derived and set out a clear methodology for measuring and reporting trip-generation. Without clarity or supporting evidence on how the trip-credit system operates, the requirement risks delaying site delivery and undermines consistency in decision-making. As written, the policy fails the National Planning Policy Framework tests (paragraph 16): 16(d): it's not clearly written or unambiguous. and 16(b): it's not demonstrably deliverable in its current form.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation	Redraft policy to define "materially lower". Amend IDP to cross reference Policy DM15. Provide further evidence as to how the vehicle trip credit system is expected to operate to ensure it is deliverable.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 852	DHA (Seth Tyler)	Developers or Agents	Support the policy in principle. However suggest deleting reference to the need for self-build and custom plots as this is dealt with in Policy T9.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Amend policy wording to delete: "custom and self-build plots".	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 853	DHA (Seth Tyler)	Developers or Agents	Suggests having a plan or tool to show the locations of the different affordable housing thresholds to reduce ambiguity and ensure it is applied consistently. Suggests amending the wording of the second to last paragraph in the policy to take account of high abnormal costs. Suggested wording given. Also suggests amending wording to paragraph 3 bullet point 5 of Policy T3 to ensure it is effective as it may not always be viable. Suggested wording given.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Second to last paragraph [Add: The Council acknowledge that brownfield sites have higher abnormal costs. Where there are high abnormal cost a] viability assessment in line with national policy and guidance should be submitted to the Council to be independently verified if the affordable housing proposed does not meet that which is required. Paragraph 3 bullet point 5 suggested wording: [Add: "Where practicable to do so,] reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment."	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.

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Email	E.150	File E	Mr Kevin Rice	SDLP 854	DHA (Seth Tyler)	Developers or Agents	Support principle of the policy, however suggest rewording bullet point 2 of Policy S10 to allow relocation of uses to sites at Kingsnorth and the Isle of Grain to facilitate the regeneration of Medway City Estate. Suggested wording given.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Suggested wording for bullet point 2: "Industrial (E (g)(ii), E (g)(iii) (formerly B1b and B1c)) and warehouse (B8) uses will be located on the periphery of Medway close to the existing strategic road network [add: on allocated sites at Kingsnorth and the Isle of Grain on the Hoo peninsular or any other allocated sites.]	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 855	DHA (Seth Tyler)	Developers or Agents	Feel 12 month marketing period is excessive, other local plans have 6 months and suggest clarifying whether allocated sites and identified opportunity need to comply with this policy. Suggested wording given.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision	Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where [Add: the site is not proposed as an allocation in the Local Plan if]: • The existing use is proven to be no longer appropriate or viable. • There is no market interest in the in the site, and it has been market for a reasonable period (of 12 [Add: 6] months). Once this has been proven then the site will be considered for loss or redevelopment if one or more of the following criteria apply: • the site is no longer appropriate due to detrimental impact on residential amenity; • proposals should demonstrate how employment opportunities have been maximised and incorporated into a scheme, where possible; and • any redevelopment conforms to the Council's regeneration agenda	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 856	DHA (Seth Tyler)	Developers or Agents	For the Plan to satisfy the legal tests, an additional year must be added to the Plan period extending it to 2042	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Extend plan period to 2042	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 857	DHA (Seth Tyler)	Developers or Agents	The small buffer is not identified within the Plan itself, but rather in the Land Availability Assessment (June 2025). Table 7 of the LAA sets out the buffer to be 203 dwellings across the plan period (a buffer of just 0.8%). Suggest a buffer of 5-8% to account for non-delivery of sites during the plan period as best practice.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.7	Suggest the buffer of housing supply be included in the Plan itself and increased to 5-8%.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 858	DHA (Seth Tyler)	Developers or Agents	The Duty to Cooperate Statement is incomplete and a number of matters, specifically in relation to housing numbers and shared infrastructure which remain to be resolved/agreed . In the absence of any further SoCG it is therefore unclear whether the Council's statutory duty has been fulfilled and if the Plan does plan to provide for unmet housing need of neighbouring authorities.	1. Overview	1.4 Duty to Cooperate		The missing completed Duty to Cooperate Statement must be made available for consultation before proceeding to examination.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.

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Email	E.150	File E	Mr Kevin Rice	SDLP 859	DHA (Seth Tyler)	Developers or Agents	The "Vision" fails to identify housing provision as an essential component of the Plan, contrary to NPPF paragraph 15. Consequently the draft Local Plan fails to be positively prepared to provide a suitable framework for addressing housing and employment needs. Suggests amending the vision.	2. Vision and Strategic Objectives	2.1 Vision		Amend the Vision to reference housing and employment provisions.	Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 860	DHA (Seth Tyler)	Developers or Agents	No strategic objective expressly deals with the amount of housing that needs to be delivered, and whether the Plan is looking to meet Medway's needs, the draft Local Plan is therefore considered not to be "Positively Prepared" or "Justified," contrary to the NPPF (para 35). Supporting Healthy Lives & Strong Communities - Acknowledges housing broadly but omits any target or quantum of homes. Without a defined housing provision, it cannot guide the choice of the preferred growth option (SGO) or underpin draft policies (as required by NPPF paras 20 & 23). Recommends adding a standalone strategic objective that clearly commits to meeting Medway's full housing needs, making the plan positively prepared and justified (NPPF para 35). Under objective: Securing Jobs & Developing Skills for a Competitive Economy - The aim to grow employment and skills is supported in principle, and the delivery of jobs, higher-value floorspace, and upskilling is intrinsically linked to providing enough homes. Proposes a separate strategic objective for housing and employment growth to reflect that interdependence. Under Objective: Boosting Pride through Quality & Resilient Development - Welcomes emphasis on brownfield regeneration in line with NPPF para 123. Notes the objective currently reads as if urban regeneration alone is the priority. Argues it should form part of a broader housing strategy that also considers suburban expansion, rural development, and Green Belt release. Warns the current wording risks misleading consultees about	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 861	DHA (Seth Tyler)	Developers or Agents	Brief context for Site SR53 (formerly SR40) given, which aligns with the Council's brownfield-first spatial strategy. To meet Medway's full OAN, the preferred blended SGO must include more than just suburban expansion and greenfield allocations. Regarding phasing and deliverability Suburban expansion and greenfield sites will deliver homes early in the plan period. Brownfield sites like SR53 (formerly SR40 Waterside Court) typically come forward later due to constraints (existing uses, remediation). Medway must plan to meet its full OAN for both market and affordable housing (NPPF paras 11 b, 23). This supports the Government's objective to significantly boost the supply of homes (NPPF para 60). The Council should engage with Gravesham Borough Council to test whether Gravesham needs Medway to accommodate up to 2,000 homes. An up-to-date Statement of Common Ground between the two authorities will ensure cross-boundary collaboration and that the Plan is positively prepared (NPPF para 35).	3. Spatial Development Strategy	3.1 Overview			Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.150	File E	Mr Kevin Rice	SDLP 862	DHA (Seth Tyler)	Developers or Agents	Additional site allocations across the district are required to meet Medway's full OAN and the unmet needs of Gravesham BC and Tonbridge & Malling BC (as per NPPF paragraph 23) over the plan period. Also advocates designating the entire Medway City Estate peninsula as an "Opportunity Area" for further residential and mixed-use development over the next two plan periods. This would enable phased redevelopment of the peninsula and facilitate relocation of existing industrial uses to Kingsnorth and Isle of Grain, where employment allocations are already indicated on the draft Policies Maps.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area			Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.

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Email	E.150	File E	Mr Kevin Rice	SDLP 863	DHA (Seth Tyler)	Developers or Agents	Document included giving context and reasons for allocating the site SR53 (formerly SR40) Waterside Court.	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - South East		Yes	To discuss the legal compliance and soundness of the plan with specific reference to: • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4506	N/A	Members of the Public	Supports strategic ambition, although the approach of declassifying some areas of Green Belt is inconsistent with this Strategic objective.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable			
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4507	N/A	Members of the Public	Supports strategic objective but proposals in the plan are inconsistent with it, in particular changing land use at Chatham Docks.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 3: Securing jobs and developing skills for a competitive economy			
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4634	N/A	Members of the Public	Concerned the developments to the West of Strood lacks infrastructure and loss of agricultural land.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.2	The reference to "less" before "sensitive areas" should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4635	N/A	Members of the Public	Concern over Green Belt Review, with 2025 contradicting 2018 review and not reflecting Grey Belt. Concerned are releasing Green Belt to expand Strood.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.5	The reference to the Green Belt review should be revised to reflect its contentious nature and a commitment should be given to consult specifically, transparently and meaningfully on a new Green Belt Review before making any decisions on change of classification to Grey Belt	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4636	N/A	Members of the Public	The Medway Green Belt Review does not provide a strong case for exceptional circumstances to release the land to the west of Strood.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.8	The areas to the east of Strood should continue to be Green Belt and be removed from the Local Plan.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4637	N/A	Members of the Public	Concern over actual development of brownfield sites and employee redundancies at Chatham Docks.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3	The plan should emphasise protecting existing industry and employment alongside developments on brownfield sites and new developments.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4638	N/A	Members of the Public	Concern over Green Belt Review, with 2025 contradicting 2018 review and not reflecting Grey Belt. Concerned are releasing Green Belt to expand Strood.	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	The areas to the west of Strood should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4639	N/A	Members of the Public	Concern over contradiction over emphasising the environment yet classifying agricultural land as Grey Belt and developing it.	4. Natural Environment	4.1 Introduction	Paragraph 4.1.1	The land to the west of Strood should be retained as Green Belt.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4640	N/A	Members of the Public	Developing on the Green Belt will negatively impact on the countryside adjoining Strood and residents in the west of Strood.	4. Natural Environment	4.5 Landscape protection and enhancement	Paragraph 4.5.7	The plan should commit to the maintenance of Green Belt that is in agricultural use and which contributes to the beauty of the countryside.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4641	N/A	Members of the Public	Concern that development on Green Belt will increase traffic, congestion and lower air quality.	4. Natural Environment	4.10 Air quality	Paragraph 4.10.1	The statement should be amended to commit that green belt land in poor air quality areas, or where significant traffic congestion may arise will not be released for development.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4642	N/A	Members of the Public	Increases in air pollution should not be considered acceptable.	4. Natural Environment	4.10 Air quality	Paragraph 4.10.5	The statement regarding increased air pollution being acceptable should be remove.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4643	N/A	Members of the Public	Concern that the Duty to Cooperate report has not been published for the consultation, alternative routes (FOIs) for this information are unsuccessful. Concern that Medway have been pressured by Gravesham Council and misuse of duty to cooperate to release Green Belt to the west of Strood.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.2	The removal of Green Belt status for Land West of Strood should be deleted from the Medway Draft Local Plan.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4644	N/A	Members of the Public	The independent review of the Green Belt Review has not been published so the public are not able to consider its findings in responding to this consultation.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.3	The consultation should be delayed until the report is published and the public given sufficient time to review it or the reference to the independent review should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4648	N/A	Members of the Public	Concern that the Duty to Cooperate report has not been published for the consultation. Concern that Medway have been pressured by Gravesham Council and misuse of duty to cooperate to release Green Belt to the west of Strood.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3	The references to exceptional circumstances and re-classification of Green Belt should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4649	N/A	Members of the Public	The Medway Green Belt Review 2025 is flawed and should be disregarded. The Exceptional Circumstances claimed are not valid.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.5	The Medway Green Belt Review 2025 should be disregarded and the exceptional Circumstances should be removed. The current Green Belt to the West of Strood should be retained as Green Belt.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4650	N/A	Members of the Public	Concern over reclassification of Green Belt to Grey Belt and development on Grey Belt.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.6	This paragraph is mis-leading and needs to be rewritten as it does not represent what is in the Draft Local Plan regarding Green Belt.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4651	N/A	Members of the Public	The Medway Green Belt Review 2025 is flawed and does not justify release of Green Belt. The Exceptional Circumstances claimed are not valid.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.8	The land to the west of Strood should be retained as Green Belt and not be available for development.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4652	N/A	Members of the Public	Paragraph 4.12.9 does not give sufficient emphasis to Medway Council's obligations to strongly represent the views of residents.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.9	This paragraph should reflect that Medway will preserve it's own Green Belt and resist attempts to narrow the gap between neighbouring towns.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4653	N/A	Members of the Public	Disagrees with Council's review of Green Belt 2025, and classification of Grey Belt. Concerned declassification of Green Belt due to pressure by Gravesham, does not believe this is a sound way to develop a Local Plan and improper use of Duty to Co-operate. Concerned about absence of Duty to Cooperate report.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.1	The change to the classification of current Green Belt land to the west of Strood should be scrapped.	No	

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Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4654	N/A	Members of the Public	Concern that the Duty to Cooperate report has not been published for the consultation, alternative routes (FOIs) for this information are unsuccessful. Concern that Medway have been pressured by Gravesham Council and misuse of duty to cooperate to release Green Belt to the west of Strood.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.2	The reclassification of Green Belt Land to the west of Strood should be removed from the plan.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4655	N/A	Members of the Public	Disagrees with development west of Strood and transition to the countryside	14. Site Allocations	14.7 Strood West	Paragraph 14.7.4	The Green Bet Land to the west of Strood should be retained.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4658	N/A	Members of the Public	Concern over infrastructure and whether developers will deliver it. Concern the Masterplan for West of Strood does not have local support nor take account of aviation fuel pipeline crossing the site	14. Site Allocations	14.7 Strood West	Paragraph 14.7.5	Removal of development from current Medway Green Belt.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4660	N/A	Members of the Public	The maps provided are poor quality and difficult for the layman to interpret.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.6	Clearer maps with local areas in more appropriate scale.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4667	N/A	Members of the Public	Concern over traffic, capacity of roads and congestion at roads in Policy SA6 6B	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Reference to "lower order roads" should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4668	N/A	Members of the Public	Concern that Duty to Cooperate report have not been published.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.4	The plan must be delayed until the relevant documents have been made public and appropriate time has been allowed for the contents of the plans to be reviewed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4669	N/A	Members of the Public	Concern that green field is prioritised over brownfield due to delays of developing brownfield. Example given.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.4	The plan should make a commitment to early development of brownfield sites ahead of greenfield development.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4670	N/A	Members of the Public	Disagrees that land to West of Strood meets Grey Belt requirements. Concern Green Belt release driven by Gravesham threats, not be a sound way to develop a Local Plan for Medway or a proper use of the duty to co-operate	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	The reclassification of Green Belt to Grey Belt in the palm should be removed.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4671	N/A	Members of the Public	Land to the west of Strood has been incorrectly classified as Grey Belt and should remain Green Belt.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.7	On the basis that the land to the west of Strood should remain Green Belt it should be removed from the Development Sites category on the map.	No	
Online	1481	Online (OPUS)	Mr Kevin Smith [1481]	4672	N/A	Members of the Public	Disagrees that land to West of Strood meets Gey Belt requirements. Concern Green Belt release driven by Gravesham threats, not be a sound way to develop a Local Plan for Medway or a proper use of the duty to co-operate	3. Spatial Development Strategy			The reclassification of land to the west of Strood to Grey Belt should be removed from the Draft Plan.	No	
Online	1630	Online (OPUS)	Mr Lee Squires [1630]	4829	N/A	Members of the Public	Objects to the reclassification of actively farmed land in Strood North as grey belt. Questions the basis for this decision and calls for transparency in reporting and justification.	Regulation 19 Consultation		Paragraph 7 - Chapter 4	An independent review of any such green belt sites where councils wish to change them to grey belt so that these decisions are not made around pleasing other councils or government. Gravesham has lots more Greenbelt than Medway so why should Gravesham be forcing Medway to relieve the development pressure	No	
Online	1630	Online (OPUS)	Mr Lee Squires [1630]	4833	N/A	Members of the Public	Questions why parcels 1–4 in Strood were selected for development over other Greenbelt areas. Warns that development will lead to urban sprawl and loss of separation between Strood and Higham	Regulation 19 Consultation		Paragraph 17 - Chapter 14	Parcels 1-4 should be take off the table for the local plan and should never be built on.	No	
Online	1630	Online (OPUS)	Mr Lee Squires [1630]	4835	N/A	Members of the Public	Parcel 1-4 Strood North does not handle water drainage well. Provides photographic evidence of flooding.	Regulation 19 Consultation		Paragraph 7 - Chapter 7	Removal of parcels 1-4 from the local plan and now longer classed as viable for development.	No	
Online	1630	Online (OPUS)	Mr Lee Squires [1630]	4837	N/A	Members of the Public	Objects to development on parcels 1–4 due to presence of protected wildlife, including bats and hawks. Warns of habitat destruction and potential illegality.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 19-21	Parcels 1-4 removed from the local plan and not be built on.	No	
Online	663	Online (OPUS)	Mr Leslie Brown [663]	4581	N/A	Members of the Public	Highlights poor accessibility for disabled people in recent developments e.g. and calls for inclusive design standards based on given examples of legal precedent and research e.g. 2023 FWCA Civ 1496.	9. Transport	9.9 User hierarchy and street design	Paragraph 9.9.1			
Online	663	Online (OPUS)	Mr Leslie Brown [663]	4582	N/A	Members of the Public	Please add disabled access to the policy.	9. Transport	9.9 User hierarchy and street design	Policy T25: User hierarchy and street design	Please add disabled access to the policy.		
Online	663	Online (OPUS)	Mr Leslie Brown [663]	4583	N/A	Members of the Public	Villages need to expand as services and bus services are already in place. With over 10,000 new housing in the area, proposed a development corporation is required to staff the department required for this massive development proposal. Will external consultants with no local knowledge again be used.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			
Online	663	Online (OPUS)	Mr Leslie Brown [663]	4584	N/A	Members of the Public	Medway continue to apply a planning condition that is in another statute. It should not be used, or only for guidance.	9. Transport	9.12 Parking	Paragraph 9.12.2	Medway continue to apply a planning condition that is in another statute. It should not be used, or only for guidance.		
Online	663	Online (OPUS)	Mr Leslie Brown [663]	4585	N/A	Members of the Public	Developments have been approved that do not have traffic calming and do not have footways. This is bad planning and not safe for children, parents, and wheelchair users.	9. Transport	9.12 Parking	Paragraph 9.12.9			
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5021	N/A	Members of the Public	Support safeguarding land for rail growth—vital for sustainable links, environment, and retaining young professionals in Medway long-term.	3. Spatial Development Strategy					
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5022	N/A	Members of the Public	Support for prioritising brownfield development and design led regeneration.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.3			
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5025	N/A	Members of the Public	Clarity on minimum values as assumption is more affordable homes would be needed in lower-value areas	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing			
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5026	N/A	Members of the Public	Questions 10% modal shift	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5027	N/A	Members of the Public	Please convert this to clear triggers (e.g., “no more than X homes occupied until bus priority/rail works/school phase delivered”).	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery	Paragraph 10.5.12	Please convert this to clear triggers (e.g., “no more than X homes occupied until bus priority/rail works/school phase delivered”).	No	

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Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5028	N/A	Members of the Public	Enhance DM22 by incorporating open-access ducting and public Wi-Fi in our centres. This initiative can be a game-changer for start-ups, promotes remote and hybrid work, and boosts evening economy attendance significantly.	10. Health, Communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications			
Online	1338	Online (OPUS)	Mr Lincoln Ritchie [1338]	5029	N/A	Members of the Public	Many of these goals should be converted into measurable conditions that can be evaluated by those that will be affected by them (e.g., % of homes within 400m of a 710-min bus, x-distance of new cycle lanes delivered). It directly improves cost-of-living, access to opportunity, and accountability.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4473	N/A	Members of the Public	The reg 19 activities have been rushed through in 6 weeks during summer holiday season while reg 18 was 8 weeks. The reg 18 plan included 3 options, two of which did not include development at the orchards off Pump Lane (SA10). MC stated a preference for option 3 which again did not include development at SA10. The development has previously been rejected by both MC and Secretary of state. The people have therefore made it very clear in previous consultations that they do not want this development.	Regulation 19 Consultation		Paragraph 3	Remove Lower Rainham SA10 from the Medway Local Plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4474	N/A	Members of the Public	The plan to include SA10 does nothing to preserve the environment of hundreds of acres of orchards/agricultural land.	Regulation 19 Consultation		Paragraph 5	Remove SA10 from the plan	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4475	N/A	Members of the Public	Concern over adding another 750 homes and two schools to an already congested area of Medway/Rainham. Residents will be unable to sell their houses at market value should they wish or need to for a period of up to 12 years, the planned length of the consultation/development.	1. Overview	1.1 Introduction	Paragraph 1.1.1	Remove Lower Rainham SA10 from the Local Plan	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4476	N/A	Members of the Public	The plan will do nothing to improve the 'clean air' in and around the area designated for SA10 Lower Rainham. The area already suffers from congestion and adding 750 homes and two schools will do nothing to improve that situation.	1. Overview	1.2 Medway area	Paragraph 1.2.2	Remove SA10 Lower Rainham from the Local Plan	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4477	N/A	Members of the Public	Highlights lack of traffic analysis for Beechings Road/Pump Lane junction and questions legality of excluding it from consultation; suspects schools will be dropped and continue to increase housing numbers.	1. Overview	1.2 Medway area	Paragraph 1.2.10	Remove SA10 Lower Rainham form the local Plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4478	N/A	Members of the Public	Disingenuous to state that engagement and input from consultation has informed the plan. The previous reg 18 consultation did not include SA10 so the community did not need to respond at that time, the plan to build in this area had previously been rejected by the council and UK secretary of state following extremely strong opposition from the local community.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.2	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4479	N/A	Members of the Public	This section is contradictory setting out the areas 'valued landscapes' a reason previously given for rejection of the proposed development of Orchards at SA10 Lower Rainham.	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4480	N/A	Members of the Public	Although not mentioned here at all, 'extensions... to the North of Rainham' are described in the Regulation 19 summary booklet as being suburban areas whereas they are clearly rural green field sites. This is misleading at best.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.5	Clarify the unfiltered statistics once SA10, Lower Rainham, has been removed from the local Plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4482	N/A	Members of the Public	It is difficult to acknowledge how developing adjacent agricultural land will 'avoid, or minimise' the need for flooding solutions alongside a road that already floods when it rains heavily.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4483	N/A	Members of the Public	Congestion at the junction of Pump Lane/Lower Rainham road is dire. Analysis shows the bad effects of the bottle neck at the adjacent traffic lights made worse by the inclusion of the new development. No traffic analysis has been published for the consultation at the junction of Beechings way/Pump Lane which would be crippled by the inclusion of additional housing, a secondary and additional primary school.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.1	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4484	N/A	Members of the Public	The reasons given for refusing the planning application have not changed nor been mitigated sufficiently to warrant any decision other than refusing it again.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.4			
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4485	N/A	Members of the Public	Remove SA10, Lower Rainham, from the Local plan. It makes no difference that the proposal comes from SMEs. The proposed developer has confirmed verbally during the consultation process that the development will take up to 10 years regardless. The development will not be entirely different to that rejected at appeal in 2021. 750 homes is less than 1250 homes but will still be 750 homes, a blot on what was previously agricultural land that will be lost forever. The strains on the transport system will also be significant with the addition of those homes and a huge	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.5	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4486	N/A	Members of the Public	Building 750 homes and huge secondary school will have adverse landscape impacts. The rural design code does not exist and has not been included in the consultation so it could effectively be made up as it goes along to suit whatever needs the developer has.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.6	Remove SA10, Lower Rainham, from the Local plan.	No	

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Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4487	N/A	Members of the Public	Proposed developer confirmed during consultation meetings that they expect the development to take 10 years. Stating here that the development will be quicker is disingenuous. The houses looking different to each other does nothing to address the infrastructure issue and loss of agricultural land.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.7	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4488	N/A	Members of the Public	Rainham Parkside Village would destroy the rural setting.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.8	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4489	N/A	Members of the Public	Making the bottom end of Pump Lane 'one way' shows the complete disregard for existing residents in the area when planning new development. Residents close to home travelling north could have their journeys significantly extended by being diverted through the new estate and via the Lower Rainham Road which is usually backed up at peak hours and has already been assessed as being significantly worse following the new development.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.9	Remove SA10, Lower Rainham, from the Local plan.	No	
Online	1561	Online (OPUS)	Mr Mark Hewer [1561]	4490	N/A	Members of the Public	SA10 - Raises concerns about traffic congestion at Medway City Estate and questions the reliability of transport modelling, especially the absence of Aimsun software in the new assessment.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.15	Remove SA10 Lower Rainham from the Medway Local Plan.	No	
Online	1545	Online (OPUS)	Mr Michael Woolmington [1545]	4452	N/A	Members of the Public	Concern over congestion caused by development on Hoo Peninsula. Lack of infrastructure	Regulation 19 Consultation		Paragraph 1	Road infrastructure should be the number one priority and therefore housing should be built with this in mind.	Yes	To ensure that both mine and others suggestions have been acknowledged and dealt with
Online	1512	Online (OPUS)	Mr Nigel Skinner [1512]	4387	N/A	Members of the Public	Concern over level of growth in Hoo Peninsula and potential impact on natural environment. Concern over health impact and existing lack of infrastructure and future growth.	1. Overview	1.2 Medway area	Paragraph 1.2.1	See above	No	
Online	521	Online (OPUS)	Mr Paul Hawkins [521]	4342	N/A	Members of the Public	The extra housing and population increase is not supported by infrastructure.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Make the plan will included new hospitals and schools to support the people of Medway. It is more than obvious that Medway Hospital is bursting at the seams and cannot cope with the current population	no	
Online	1592	Online (OPUS)	Mr Phil Worton [1592]	4563	N/A	Members of the Public	Acknowledges wider stakeholder consultation but queries efforts with general public.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.2	Depending on the answer to the above I think the plan should be revisited with proper consultation with the residents for which the plan is supposed to represent.	No	
Online	1592	Online (OPUS)	Mr Phil Worton [1592]	4568	N/A	Members of the Public	Querying origins of demographic growth that Local Plan is planning for.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	I think the plan should be clear about who it is designed for. It is clear to me that this plan is not designed for the existing local community	No	
Online	1592	Online (OPUS)	Mr Phil Worton [1592]	4575	N/A	Members of the Public	Does not believe the plan accurately reflects the needs of the community, or that people of Medway want to reduce transportation by car. Believes the community wants to improve the quality of road travel by decreasing levels of traffic. The need to drive needs to be considered.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.1	Reconsider the needs of the people so that their ability to travel by car in enhanced.	No	
Online	591	Online (OPUS)	Mr Ray Dines [591]	4418	N/A	Members of the Public	Doesn't demonstrate how the scale of development proposed can be accommodated or how the necessary infrastructure can be funded.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.9	The plan needed to identify the scale and timescale of infrastructure required and how it will be funded over the plan period.	Yes	Too often written objections are ignored and it is necessary to stress the importance of this issue.
Online	591	Online (OPUS)	Mr Ray Dines [591]	4419	N/A	Members of the Public	Querying meaning of paragraph/statement.	4. Natural Environment	4.8 Flood and water management	Paragraph 4.8.10	The plan needs to state how the supplies and resources will be protected and conserved.	Yes	Written representations are too often ignored. It is essential that the importance matter is stressed by attendance at the Inquiry.
Online	591	Online (OPUS)	Mr Ray Dines [591]	4424	N/A	Members of the Public	Concern raised over impact of development in relation to water pollution and the need for infrastructure to tackle issue.	4. Natural Environment	4.8 Flood and water management	Paragraphs 4.8.11 to 4.8.13 (Wastewater)	Far more detail is required on what infrastructure is required and when it will be provided.	Yes	See previous comments

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Online	591	Online (OPUS)	Mr Ray Dines [591]	4429	N/A	Members of the Public	Querying lack of reference to need for improvements to M2 Junction 4 in reference to development of Capstone Valley.	9. Transport	9.1 Vision for Access and movement in Medway		Detailed transport studies to test the development proposals in the Capstone Valley and the viability of junction improvements at M2 junction 4.	Yes	This a complex situation and the current proposals for the Capstone Valley are unsupported by appropriate access strategy. Much of this information will doubtless come forward at a late stage of the public hearings with no opportunity for interested parties. This was certainly the case with the Maidstone Local Plan Inquiry and even now there is no approved design for the proposed improvements at M2 junction 4 upon which the whole of the development proposals in the
Online	591	Online (OPUS)	Mr Ray Dines [591]	4430	N/A	Members of the Public	Concern over detail provided for Capstone Valley, design, costings and impact on highway network.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.3	The plan itself makes no reference to the final alignment of the M2 junction link road at junction 4. This clearly needs to be defined along with its impact on the North Downs Aon. At this moment in time the scheme promoters have failed to demonstrate that it can be delivered within their land holding in the relation to the connection with Maidstone Road.	Yes	See previous comments
Online	591	Online (OPUS)	Mr Ray Dines [591]	4431	N/A	Members of the Public	Concern raised over detail provided in relation to large allocations connection to road network. Concern over lack of connection to rail network	14. Site Allocations	14.8 Capstone Valley	Figure 13: Capstone Valley Concept Plan	Exclude major new housing allocations in the Capstone Valley that would seriously damage the landscape and biodiversity of the Capstone Valley.	Yes	See previous comments
Online	591	Online (OPUS)	Mr Ray Dines [591]	4443	N/A	Members of the Public	There needs to be a proper delivery plan for the secondary school. There is an urgent need for more secondary school places in the short term.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.6	More details of funding and timing to be provided.	Yes	See previous comments
Online	591	Online (OPUS)	Mr Ray Dines [591]	4444	N/A	Members of the Public	Concern no ecological assessment completed of new allocations in Capstone Valley and does not consider there is adequate mitigation.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.5	There needs to be an overall ecological and bio diversity plan for the Capstone Valley and the creation of new interlinked areas of protected Country Park.	Yes	See previous comments
Online	591	Online (OPUS)	Mr Ray Dines [591]	4445	N/A	Members of the Public	A number of concerns raised regarding transport, primarily route of orbital bus service, vagueness of concept plan, connections with the highway network, untested transport impact of the development on M2 junction 4 and A278/Sharsted Way and no detail of necessary infrastructure improvements	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	A properly tested access strategy is required.	Yes	See previous comments
Online	1527	Online (OPUS)	Mr Ray Holton [1527]	4693	N/A	Members of the public	Lower Rainham Road is effectively a country lane, yet is already very busy due to recent developments. This part of the plan will only lead to more traffic congestion, more accidents and the loss of green areas. You are trying to turn Rainham into a medium-sized town, on top of recent additions (last 20 years). If I wanted to live in a busy town I would have moved to one, not to Rainham.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Stop sanctioning large-scale housing developments on every piece of green, undeveloped agricultural or natural land. A recent news item stated that there are at least 400,000 uninhabited houses in the UK. Fill them first!	No	
Online	1527	Online (OPUS)	Mr Ray Holton [1527]	4695	N/A	Members of the public	The struggle to fill empty retail outlets in Rainham is because of extortionate rents charged by the landlord(s).	8. Retail and Town Centres	8.11 Rainham district centre	Paragraph 8.11.1	Assuming that the owners of the Rainham Shopping centre is/are private companies, does the Council have any power to cap rentals? If not the plan is a dead duck, and claiming that there is no demand is an excuse	No	
Online	1628	Online (OPUS)	Mr Richard Bellingham [1628]	4976	N/A	Members of the Public	Opposed to allocation in greenbelt and loss of agricultural land. Concern over impact climate etc.	1. Overview	1.2 Medway area	Paragraph 1.2.5	The plan should not include the wholesale destruction of quality arable land for housing.	No	
Online	1628	Online (OPUS)	Mr Richard Bellingham [1628]	5018	N/A	Members of the Public	Failure of the Plan to adopt a brownfield first approach. The erosion of Greenbelt land is contrary to national planning principles. The local area has inadequate infrastructure to support the scope of the development proposed. Long term, irreversible environmental damage.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4	- Reconsideration of the housing plans to focus on brownfield sites and urban regeneration - Protection, not destruction of valuable food producing land and green space. - More specific and quantified plans for resolving existing shortfalls in essential public services such as health care, hospital capacity and quality and improved road infrastructure, schooling etc as well as how additional resources will be engaged to accommodate proposed	No	
Online	741	Online (OPUS)	Mr Richard Carpenter [741]	4953	N/A	Members of the Public	Need for enclosed. Dock with lock gate in reference to Chatham Docks closure.	7. Economic Development	7.4 New employment sites	Paragraph 7.4.4			
Online	741	Online (OPUS)	Mr Richard Carpenter [741]	4963	N/A	Members of the Public	Support for protection of Chatham Docks as employment site	7. Economic Development	7.3 Existing employment provision	Paragraph 7.3.1	Keep Chatham docks as a working dock!	No	
Online	741	Online (OPUS)	Mr Richard Carpenter [741]	4968	N/A	Members of the Public	Concern over lack of sports facilities on the Hoo Peninsula - raising issue of loss in relation to growth proposed.	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Paragraph 10.3.6			
Online	741	Online (OPUS)	Mr Richard Carpenter [741]	4972	N/A	Members of the Public	Requesting community/sports/social centre of Hoo.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.5			

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Email	E.172	File J	Mr Richard Castle	SDLP 1112	Bloomfields (Thomas Ogden)	Developers or Agents	Advocates that the Council looks for a larger number of sites to ensure that there are enough sites to meet the housing requirement, including the buffer.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.172	File J	Mr Richard Castle	SDLP 1113	Bloomfields (Thomas Ogden)	Developers or Agents	Continues to promote three sites referenced at Middle & Lower Stoke (AS14, AS15, and AS17) for potential site allocation. 2 Design Development Statements and a Masterplan included in submission.	14. Site Allocations	14.13 Other Sites			No	
Online	922	Online (OPUS)	Mr Rob Sibley [922]	4547	N/A	Members of the Public	Medway needs an up to date and appropriate Local Plan. The council should progress this with all speed.	Regulation 19 Consultation		Paragraph 1			
Online	1614	Online (OPUS)	Mr Robert Bursey [1614]	4759	N/A	Members of the public	Calls for a general Article 4 Direction to prevent developers exploiting planning loopholes and to allow proper public consultation.	Regulation 19 Consultation		Paragraph 9 - Chapter 6	Introduce a general Article 4 Direction to all of Medway.	No	
Online	1660	Online (OPUS)	Mr Robert Morgan [1660]	4974	N/A	Members of the Public	Object to policy SA6. Disagrees with reclassification of Green Belt to Grey Belt, particularly sites SNF3 and SR5 and that the Green Belt Review and reclassification occurred after close of Regulation 18 consultation. Policy SA6 cannot be considered "Sound" as it was introduced after the regulation 18 consultations had closed and is a significant change from the policy that was suggested at the time of the consultation.	Regulation 19 Consultation		Paragraph 17 - Chapter 14	See attached form.	Yes	To ensure that adequate consideration is given to representations about this significant change in policy made after the Regulation Yes8 consultation had closed.
Online	1574	Online (OPUS)	Mr robin teslar [1574]	4950	N/A	Members of the Public	Concern raised over flood risk and use of 5 year old evidence to support policy. Further consideration required.	Regulation 19 Consultation		Paragraph 1	Look at the present dangers presented by the latest flood predictions using contemporary data	No	
Online	769	Online (OPUS)	Mr Rupert Turpin [769]	4586	N/A	Members of the Public	Concern over cost of losing Chatham Docks employment land to Medway's economy and that job and employment land loss is not recorded.	7. Economic Development	7.4 New employment sites	Paragraph 7.4.3		Yes	I would like to give my views in person
Online	1604	Online (OPUS)	Mr Russell Smith [1604]	4633	N/A	Members of the Public	Object to building on the orchards at Lower Rainham.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.4	Remove this allocation completely.	Yes	Because I am concerned that the council is not listening to residents - AGAIN
Online	1604	Online (OPUS)	Mr Russell Smith [1604]	4645	N/A	Members of the Public	Object to housing development in Lower Rainham as roads cannot cope.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.5	Do not build anything in this area.	Yes	Because the council is not listening to its voters
Online	1604	Online (OPUS)	Mr Russell Smith [1604]	4646	N/A	Members of the Public	The roads in the area cannot cope with the current flow of traffic. More houses will make it worse, especially at this volume.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.6	Do not build in this area. Make the lower Rainham Road of similar flow to the A2 i.e. by widening at pinch points such as at the Three Mariners pub so that traffic lights can be removed. Remove humps, increase speed limit to 40mph	Yes	Because the council does not listen.
Online	1604	Online (OPUS)	Mr Russell Smith [1604]	4647	N/A	Members of the Public	The reason that Rainham centre does not flourish is because of the increase in parking charges and the high shop rental charges.	8. Retail and Town Centres	8.11 Rainham district centre	Paragraph 8.11.1	Remove parking charges. All shops should be purchased by the council so that rents can be lowered, thus supporting local businesses.	Yes	There was a consultation on this and following a large amount of people complaining about parking charges, the council increased them again. We need to be sure that the council is following what residents want rather than their
Online	901	Online (OPUS)	Mr satinder Shokar [901]	5012	N/A	Members of the Public	The Local Plan has not allocated any of the required sites for GRT community, or taken recommendations of the GTAA on board. It has not treated this community fairly in meeting their need.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople	*A GRT local development plan document, identifying new sites to meet the current need. * To conduct an assessment with those not meeting the planning definition and establish the exact number of pitches that are required. * To utilise public land to reach the recommendations of the GTAA. * To vigorously seeking land to meet the need of the community.	No	
Online	1665	Online (OPUS)	Mr Simon Pickard [1665]	5006	N/A	Members of the Public	Opposed to Policy SA6 and believes does not comply with NPPF. Believes inadequate transport infrastructure planned.	Regulation 19 Consultation		Paragraph 8 - Chapter 14	Consideration should be given to other sites, working with Gravesham Council. For example, a new garden city near to the new Lower Thames Crossing.	No	Previous sessions
Online	1665	Online (OPUS)	Mr Simon Pickard [1665]	5007	N/A	Members of the Public	Highlighting importance of infrastructure provision linked to development	Regulation 19 Consultation		Paragraph 1			

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Online	1665	Online (OPUS)	Mr Simon Pickard [1665]	5013	N/A	Members of the Public	Long implementation timeline -the LCWIP spans 10 years- too slow to benefit current school-age children. New developments are not required to improve cycling infrastructure, despite its role in addressing Medway's 2019 climate emergency declaration. Unsafe Existing Routes e.g. National Cycle Network Route 1 along Corporation Street Consultant-Led Delays- the plan relies on further studies instead of immediate action.	9. Transport	9.3 Active travel interventions	Paragraph 9.3.5	Continue to work on new cycle infrastructure, as proposed in the plan. Ensure that all new development includes adequate provision (applicable to all applications considered after the date that the plan is adopted).	Yes	The importance of improving infrastructure to encourage greater cycling uptake was stated in the 2003 local plan. Despite this, little has been achieved in the last 20 years. I live & work in Medway & my children both attend school here- my journeys would be suitable for cycling & I'd encourage my children to do so were it safe. I've a rare perspective having lived & worked in Europe & Asia were provisions are much better. I believe that we could make a real difference to both Medway's net zero commitment & to
Online	610	Online (OPUS)	Mr Stephen Francis [610]	4491	N/A	Members of the Public	'It is a Plan for Medway as its own place.' This is badly worded.	1. Overview	1.2 Medway area	Paragraph 1.2.1	"This is a strategic plan that recognizes Medway as a distinct and self-defined community."	No	
Online	610	Online (OPUS)	Mr Stephen Francis [610]	4492	N/A	Members of the Public	Comment on global and western climate change sceptics.	1. Overview	1.2 Medway area	Paragraph 1.2.5	Not to use alarmist language to justify measure that may cause unnecessary financial hardship, loss of freedoms and discriminate against the poorer sections of society. To recognise that the climate will change and any authoritarian control measures that Medway Council or indeed the UK introduces will have a negligible effect on global climate. It is more sound to consider climate adaption measures advocated by Bjorn Lomberg. The plan needs to be more pragmatic in introducing extra costs, fines and tax in this respect and longer term in environmental ambitions or be conflicted with its aims of supplying affordable housing and regeneration of the local economy.	No	
Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4379	N/A	MPs, Members and Parish Councils	Welcome the Reg 19 draft local plan in all aspects bar one. It is an excellent piece of work. The flaw in the plan is the naming of the Strood's Greenbelt as a council approved residential-led Site Allocation for a major housing development. That flaw includes an error in the residential-led Site Allocation numbers. It excludes the 130 residential dwellings at Commissioners Rd Pit, Strood.	Regulation 19 Consultation		Paragraph 1	The Strood's Greenbelt proposal came out of the blue as the developing policies found in Reg 18 had seeming safeguarded all of Medway's Greenbelt land. Strood's Greenbelt land some of which is located in Gravesham BC, is bounded by the A289 (Halsted Road), and lays to the immediate Northwest of Strood's current urban area. If developed would it increase Strood by nearly a third. This massive hit on Strood's infrastructure is unacceptable and the removal of Strood's green lung will cut off resident's access to the countryside's open and green spaces. Referring to the Green Belt Policy S7 found in section 4.12 of the Medway Local Plan 2041 (Reg 19) and the Land West of Strood Policy SA6 found in section 4.10. The Green Belt policy is significantly changed from the Medway Council's previous policy position expressed during in the previous drafts of the Medway Local Plan, at Regulation 18 and earlier. That previous policy position was supported by studies and other documentation. In sections 4.12.3 and 4.12.4 Medway Council states the Grey belt policy change for Strood's Greenbelt. There was no sign to the public of this policy change until the Medway Local Plan was published in the agenda papers for the Council meeting on 26th June. Reference is made to the 2025 in-house Medway Local Pan Green Belt Review that establishes the parcels of Grey belt and that 'the review was critiqued by independent consultants.' This review was not made available for	Yes	I am the local councillor for Strood North & Frindsbury Ward. I was prevented by the council's assistant director, legal and governance, from attending Local Plan Full Council meeting on 26th June 2025.

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Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4380	N/A	MPs, Members and Parish Councils	4.12- The Green Belt policy is significantly changed from the previous policy position expressed during in the previous drafts of the Local Plan. Previous policy position was supported by studies and other documentation.	Regulation 19 Consultation		Paragraph 7 - Chapter 4	In sections 4.12.3 and 4.12.4 Medway Council states the Grey belt policy change for Strood's Greenbelt. There was no sign to the public of this policy change until the Medway Local Plan was published in the agenda papers for the Council meeting on 26th June. Reference is made to the 2025 in-house Medway Local Pan Green Belt Review that establishes the parcels of Grey belt and that 'the review was critiqued by independent consultants.' This review was not made available for scrutiny, a clear failing of the consultation. At the time of the Medway Council meeting on 26th June the Gravesham BC Local Plan Regulation 19 was still to be published and agreed upon. Medway Council's new Greenbelt policy should not have been agreed to until after Gravesham BC Local Plan with its Greenbelt policy was agreed. The decision by Medway Council to approve the Local Plan was premature, based upon Greenbelt/Grey belt	Yes	I am the ward for Strood North and Frindsbury.
Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4381	N/A	MPs, Members and Parish Councils	4.10-The Green Belt policy is significantly changed from the previous policy position expressed during in the previous drafts of the Local Plan. Previous policy position was supported by studies and other documentation.	Regulation 19 Consultation		Paragraph 17 - Chapter 14	In section 14.10.5 it states that Medway Council and Gravesham BC had commissioned a high-level masterplan to inform the framework of the policy. This policy was developed with the landowners and their large volume house builders, who have been promoting large scale housing development on Strood's Greenbelt for many years, tens of years. This important and key policy document does not appear in the evidence base documents. It should have been made available for review and scrutiny. Another serious failing. The Government's Grey belt current national guidance (NPPF & PPG) for existing Greenbelt is approximately a year old. The national policy has not been tested on a scale as set out in Medway's Local Plan at sections 4.12 & 14.10. The Government had originally said Grey belt as "poor quality and ugly areas" on parts of protected Greenbelt land. The Government's current definition of the Grey belt includes land on the edge of existing settlements or roads, as well as clearly brownfield sites like "old petrol stations and car parks." It was the decision of Medway Council and Gravesham BC to decide on the re-designation of Strood's Greenbelt to Grey belt. The definition of Grey belt in Medway's Local Plan is a stretch too far and moves too far away from the definition set out in the national guidance. If you stand at the end of Clinton Ave, Strood (off Rede Court Rd) and look north over the fields you will see just green, no grey. The A289	Yes	I am the ward member for Strood North and Frindsbury
Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4382	N/A	MPs, Members and Parish Councils	If Strood's greenbelt land is developed would it increase Strood by nearly a third. This hit on Strood's infrastructure is unacceptable and the removal of Strood's green lung will cut off resident's access to the countryside's open and green spaces.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3	Reference is made to the 2025 in-house Medway Local Plan Green Belt Review that establishes the parcels of Grey belt and that 'the review was critiqued by independent consultants.' This review was not made available for scrutiny, a clear failing of the consultation. At the time of the Medway Council meeting on 26th June the Gravesham BC Local Plan Regulation 19 was still to be published and agreed upon. Medway Council's new Greenbelt policy should not have been agreed to until after Gravesham BC Local Plan with its Greenbelt policy was agreed. The decision by Medway Council to approve the Local Plan was premature, based upon Greenbelt/Grey belt assumptions and not fact. In section 14.10.5 it states that Medway Council and Gravesham BC had commissioned a high-level masterplan to inform the framework of the policy. This policy was developed with the landowners and their large volume house builders, who have been promoting large scale housing development on Strood's Greenbelt for many years, tens of years. This important and key policy document does not appear in the evidence base documents. It should have been made available for review and scrutiny. Another serious failing. The Government's Grey belt current national guidance (NPPF & PPG) for existing Greenbelt is approximately a year old. The national policy has not been tested on a scale	Yes	I am the ward member for Strood North and Frindsbury

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Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4383	N/A	MPs, Members and Parish Councils	Policies Map – South West is other evidence that the review of the Greenbelt and the residential-led Site Allocations were rushed, with poor attention to detail. There may be other such errors. The plan's Site Allocations (residential-led) requires a full review.	3. Spatial Development Strategy	3.2 Policies Map	Paragraph 3.2.1	On the South West Policies Map it shows the former quarry alongside Commissioners Road, Strood as being part of Strood's Green Belt. This is clear nonsense. It has never been Greenbelt. Back in the 2003 Medway Local Plan the site of Commissioners Rd Pit was given a 'Protection of Open Space L3' definition. This definition was challenged and a planning application for a housing development of some 130 residential dwellings in Commissioners Rd Pit was approved back in 2017. The infilling of the pit started in 2019, now completed	Yes	I am the ward member for Strood North and Frindsbury
Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4384	N/A	MPs, Members and Parish Councils	The Green Belt policy is significantly changed from the previous policy position expressed during in the previous drafts of the Local Plan. Previous policy position was supported by studies and other documentation.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt	In sections 4.12.3 and 4.12.4 Medway Council states the Grey belt policy change for Strood's Greenbelt. There was no sign to the public of this policy change until the Medway Local Plan was published in the agenda papers for the Council meeting on 26th June. Reference is made to the 2025 in-house Medway Local Pan Green Belt Review that establishes the parcels of Grey belt and that 'the review was critiqued by independent consultants.' This review was not made available for scrutiny, a clear failing of the consultation. At the time of the Medway Council meeting on 26th June the Gravesham BC Local Plan Regulation 19 was still to be published and agreed upon. Medway Council's new Greenbelt policy should not have been agreed to until after Gravesham BC Local Plan with its Greenbelt policy was agreed. The decision by Medway Council to approve the Local Plan was premature, based upon Greenbelt/Grey belt	Yes	I am the ward member for Strood North and Frindsbury
Online	1509	Online (OPUS)	Mr Stephen Hubbard [1509]	4385	N/A	MPs, Members and Parish Councils	Policies in Reg 18 seemingly safeguarded all of Medway's Greenbelt land. If Strood's greenbelt land is developed, it would increase Strood by nearly a third. This hit on Strood's infrastructure is unacceptable and the removal of Strood's green lung will cut off resident's access to the countryside's open and green spaces.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	In section 14.10.5 it states that Medway Council and Gravesham BC had commissioned a high-level masterplan to inform the framework of the policy. This policy was developed with the landowners and their large volume house builders, who have been promoting large scale housing development on Strood's Greenbelt for many years, tens of years. This important and key policy document does not appear in the evidence base documents. It should have been made available for review and scrutiny. Another serious failing. The Government's Grey belt current national guidance (NPPF & PPG) for existing Greenbelt is approximately a year old. The national policy has not been tested on a scale as set out in Medway's Local Plan at sections 4.12 & 14.10. The Government had originally said Grey belt as "poor quality and ugly areas" on parts of protected Greenbelt land. The Government's current definition of the Grey belt includes land on the edge of existing settlements or roads, as well as clearly brownfield sites like "old petrol stations and car parks." It was the decision of Medway Council and Gravesham BC to decide on the re-designation of Strood's Greenbelt to Grey belt. The definition of Grey belt in Medway's Local Plan is a stretch too far and moves too far away from the definition set out in the national guidance. If you stand at the end of Clinton Ave, Strood (off Rede Court Rd) and look north over the fields you will see just green, no grey. The A289	Yes	I am the ward member for Strood North and Frindsbury
Online	1600	Online (OPUS)	Mr Stephen Renou [1600]	4910	N/A	Members of the Public	I would like to see provision for investment into Rochester high street improvements. I do not see any provision for investment into the high street in the plan. As a major tourist attraction to Medway, Rochester and its high street need to be attractive and welcoming to tourists.	Regulation 19 Consultation		Paragraph 1	The plan should show what investment is going to be included to cover improvement and maintenance of the highstreet and consider what bodies need to be involved to bring this about..	Yes	I do not believe that provision for investment into Rochester high street is being taken seriously, but rather a focus on housing
Online	1484	Online (OPUS)	Mr Stuart Hofford [1484]	4344	N/A	Members of the Public	Concern over impact of housing and loss of green belt/agricultural land. Raises housing need for local people. Concern over provision of infrastructure to support housing.	Regulation 19 Consultation		Paragraph 9 - Chapter 6	A reduction in new housing and the removal of those parts of the plan which would destroy green belt and prime agricultural land. Any new affordable housing permissions should include specific covenants to limit there use to existing residents. These should primarily be focused on brown field sites	no	
Online	1484	Online (OPUS)	Mr Stuart Hofford [1484]	4345	N/A	Members of the Public	Concern over impact of using greenbelt -impact on residents well-being and the environment.	Regulation 19 Consultation		Paragraph 12 - Chapter 9	Losing the identity of Medway through the creeping developments along its borders should be reappraised.	no	
Online	1484	Online (OPUS)	Mr Stuart Hofford [1484]	4346	N/A	Members of the Public	Concern over impact of using greenbelt / agricultural land - impact on residents well-being.	Regulation 19 Consultation		Paragraph 17 - Chapter 14	The green belt should continue to be protected as was originally envisaged by statute to avoid the insidious urban crawl which is in danger of letting Medway become little more than a South London suburb. This is not in the interests of existing Medway residents	no	

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Online	1484	Online (OPUS)	Mr Stuart Hafford [1484]	4347	N/A	Members of the Public	Concern over use of green areas, green belt and agricultural fields and negative impact.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 1: Prepared for a sustainable	The Medway plan should protect all green belt and agricultural lands as a breathing space for Medway residents and communities.	no	
Online	1524	Online (OPUS)	Mr Stuart Lowther [1524]	4449	N/A	Members of the Public	Strong objection to allocation of Rainham Parkside Village. Generally querying process of selecting the site and evidence behind it. Reference made to loss of agricultural land.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.5	Development should be concentrated on brown field sites rather than using good agricultural land and open spaces. Particularly where there are already major traffic problems and a need to protect wildlife.	Yes	Clearly the current administration is intent on ignoring the correct planning process followed by the Council and Planning Inspectorate in 20/2Yes
Online	1485	Online (OPUS)	Mr Thomas Phillips [1485]	4348	N/A	Members of the Public	North Strood Site - Concern over development of greenbelt land. Querying justification of redesignation to grey belt. Querying evidence.	4. Natural Environment	4.1 Introduction	Paragraph 4.1.1	I understand that housing is needed, but if the greenbelt guidelines can be applied in such a liberal way no green belt land is safe ~~And will be under threat~~	No	
Online	1485	Online (OPUS)	Mr Thomas Phillips [1485]	4589	N/A	Members of the Public	Claims Medway and Gravesham councils ignored a masterplan that recommended retaining Greenbelt status for certain areas.	Regulation 19 Consultation		Paragraph 6	While I agree housing is clearly needed in this case the land concerned is clearly Greenbelt, ~~And should not be reclassified as grey belt.~~	No	
Online	1562	Online (OPUS)	Mr TONY ADAMS [1562]	4494	N/A	Members of the Public	Concern over level of development and its impacts including on roads, infrastructure, pollution, loss of Green Belt and increase in crime.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 21	* reduction in size of development * reduction in concentration of housing * removal of profit first approach to such developments * realistic parking quotas * schools doctors hospital and road improvements * more protected wild spaces ~~* realistic quota electric car charging provisions~~	No	
Online	170	Online (OPUS)	Mr Tony Osborne [170]	4558	N/A	Members of the Public	The plan cannot work due to connectivity. The existing traffic system is at breaking point morning and evening with lengthy queues on the A289 and A228. To add to this congestion with hundreds of homes and even more commercial traffic due to the proposed closure of M.C.Estate. One arterial road serving the whole peninsular at present is overloaded and dangerous, adding more traffic is beyond comprehension, another route is required.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.7	An alternative ring type road system is imperative. 1. A new improved roundabout for Four Elms Hill with a flyover and side relief roads is imperative for immediate improvement 2. A new road from the same location North easterly around Chattenden via disused land from the Army camp (avoiding the Nightingale site) then north of Hoo and rejoining the A228 east of Ropers Lane with a new road into Kingsnorth Industrial area. This would divert all commercial traffic going to Grain and Kingsnorth and all traffic out to the remaining areas of the Peninsular A new road would also mean access to future development sites on either side of its route. 3. A new river crossing from lower Gillingham Ioto Way roundabout , to Hoo Kingsnorth, to connect to the outer Hoo ring road.	Yes	I feel the access problems outlined in my comments need to aired more publicly to the planners, as I suspect the Planners are not local and fully understand the problems past and present. I have lived and had businesses in the area for 54 years and feel that my knowledge is available to pass on to others. I would therefore appreciate some
Online	1617	Online (OPUS)	Mr William Burvill [1617]	4798	N/A	MPs, Members and Parish Councils	The Local Plan does not address Local Government Reorganisation impact and risks becoming outdated and disconnected from future decision-making structures.	Regulation 19 Consultation		Paragraph 1	Local plans set a long-term vision for how an area will grow, with policies guiding sustainable development. Given the upcoming Local Government Reorganization (LGR), this Medway Local Plan must explicitly address governance changes to ensure consistent delivery of services and infrastructure. It should include adaptable policies to reflect shifting responsibilities and funding, safeguard green spaces, and prioritize community input throughout the transition. This approach will ensure Medway's growth up to 204Yes is well-managed, resilient, and aligned with the needs of its residents under new governance arrangements.	Yes	I wish to participate in the hearing sessions to ensure that the impacts of the upcoming Local Government Reorganization (LGR) on Medway's development are fully considered. It is vital to highlight concerns about governance changes, infrastructure capacity, and community representation. Participation will allow me to provide detailed evidence on these issues, advocate for adaptive policies, and ensure the Local Plan reflects the real needs and priorities of Medway residents during this critical

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Email	E.155	File E	Mr Zammit and Mr Jhalli	SDLP 886	DHA (John Collins)	Developers or Agents	*DTC Statement- The statement is not final and lacks confirmed cooperation with at least four Local Planning Authorities and five statutory consultees, including National Highways. *Discussions with Gravesham Borough on unmet housing need remain incomplete, raising concerns about whether the planned housing numbers are sufficient and if more land is needed. *Lack of Statements of Common Ground: The Council has not demonstrated compliance with Section 33A of the Planning & Compulsory Purchase Act or NPPF para 28, meaning the plan may not be "Positively Prepared" or "Consistent with National Policy"; a complete statement and identification of additional sites are needed before examination.	1. Overview	1.4 Duty to Cooperate			Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14 • Regulation 19 Proposals Map – South East (RN9)
Email	E.155	File E	Mr Zammit and Mr Jhalli	SDLP 887	DHA (John Collins)	Developers or Agents	Concern that MC seeks to over-rely on the development of PDL (brownfield land). There is inadequate evidence to demonstrate that there is a realistic likelihood that such developments will regularly be viable to be re-developed for residential purposes. Raises significant doubt as to whether the plan can be effective in delivering the necessary housing number based on Policy SA4	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14 • Regulation 19 Proposals Map – South East (RN9)
Email	E.155	File E	Mr Zammit and Mr Jhalli	SDLP 888	DHA (John Collins)	Developers or Agents	Queries omission. The site was then submitted following Reg 18a, as part of the subsequent Reg 18b consultation. The Council identified the Site as RN14. However as shown on the Reg 19 Proposals Map – South East, land to the west and south west of the site is allocated for residential led development (reference RN9). The fact that this land is allocated for development in the draft local plan, demonstrates that this location is sustainable.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Policies SA1-SA14 • Regulation 19 Proposals Map – South East (RN9)

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Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4787	Heine Planning	Developers or Agents	*Ticked no to the points listed as there is no option of don't know. *I am unclear as to the duty to cooperate with neighbouring authorities given that Medway has historically 'exported' families living in Medway to neighbouring councils rather than address need in the district. *Issue is taken with the GTAA and the fact policy only lists a need for 31 pitches. This is factually incorrect. *In 2023 a need for 78 pitches 2022-2040 was identified (56 PPTs, 18 not meeting Planning Definition and 4 undetermined). The immediate need in the first 5 years 2022-2027 was for 49 pitches. This study is not available on the Council website. *The published study states that fieldwork for the 2024 study was completed between July 2021 and March 2022 so it is already 3-4 years old and will be out of date before the new Local Plan is adopted. *ORS still refuse to acknowledge that travel for social/cultural purposes which has an economic purposes (e.g. to horse fairs) should be taken into consideration when assessing Gypsy-Traveller status. *As of December 2024 the planning definition has been revised again and is now more inclusive. When the amendments arising from the Lisa Smith judgement and the 2024 version of PPTS are both taken into account there is the potential for a significant increase (i.e. doubling) in the number of people that should be regarded as Gypsies and Travellers for planning purposes and this need will all have to be met through Traveller policies with no reliance on policies for general housing.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Paragraph 6.10.7	A more robust assessment of need is required to inform policy making	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4788	Heine Planning	Developers or Agents	Policy needs to be amended to make clear that greenbelt sites where the grey belt exception applies can be considered appropriate locations for Traveller sites. This list of exceptions is unrealistic and will simply be used to thwart provision. Exceptions have been made for sites in National Landscapes in Medway.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Paragraph 6.10.8	Given historic policy failure and on going failure of the Council to find suitable sites, the criteria policy should not be drafted to thwart provision. Exceptions can be justified in Green Belt, FRZ2, high quality farmland and national landscapes. Policy should make clear that sites should only precluded in some of these designations where the harm would be significant and can not be mitigated, and where other material circumstances outweigh any harm.	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4789	Heine Planning	Developers or Agents	This is not accepted. There has been a history of policy failure to address need. The Council needs to be more proactive in its attempts to identify suitable sites and where, as in this case, policy has failed to deliver sites, the Council needs to take a more realistic and reasonable approach to determining planning applications for new sites. The council owns land it is disposing of which could be used for Gypsy Traveller sites.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Paragraph 6.10.9	Given years of policy failure it is extremely disappointing that the Council (with all its resources and knowledge of its local area) has failed to find suitable sites for Travellers. As the Maidstone Road appeal decision confirms, the Council has failed to even consider its own land and land it is prepared to dispose of.	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4793	Heine Planning	Developers or Agents	Policy as drafted will fail to address the needs of Travellers. The need in Kent just seems to be getting larger. There are few/no new socially provided sites. Many Travellers are struggling to self provide. Unreasonable to expect Travellers to second guess what might be acceptable and go through the process of finding and buying land, making applications/ appeals etc. when Councils are incapable of at least identifying suitable sites or areas where sites might be acceptable. Councils need to realise that they must be more proactive and must do more than simply rely on call for sites or brownfield sites.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Paragraph 6.10.1	The Council needs to rethink its approach to Gypsy Travellers and allocate appropriate land for new sites. At the very least the Council needs to own up to its historic mistakes and adopt a more realistic policy approach which accepts that exceptions will have to be made if sites can not to be delivered as part of urban housing schemes.	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4794	Heine Planning	Developers or Agents	Where is the evidence to support the belief that there is scope to intensify / expand existing sites? Those doing need assessments keep suggesting this-again with no evidence to back it up. If the Council intends to make more provision at the public site at Cuxton why has it not done so? It is not uncommon for particular families to exert control over the occupation of pitches which are in private ownership. Different cadres of Gypsy Travellers may have difficulty living in close proximity to each others. Few families have the funds to intensify / expand their sites unless they are doing so on a commercial basis. Pitches on private sites offer no security of tenure. Rental costs are set	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople	Evidence is needed to substantiate claims that need can be met through intensification and expansion and these needs to be quantified	No	

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Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4876	Heine Planning	Developers or Agents	*There appears to be no assessment of need. This is contrary to Section 124 of HPA 16 . This is required in partial fulfilment of the LHA's duty to carry out a SHMA to inform itself of the accommodation needs of the population within its jurisdiction. LHAs had a statutory duty under Section 225 of the Housing Act 2004 to conduct accommodation needs assessments of people of a nomadic habit of life. *The DCLG produced draft guidance for LHAs. The DCLG thus recommends that LHAs consult the NBTA on how to carry out a BTAA. The conclusions of the LHA must reflect accurately the advice and data provided by the NBTA, otherwise it will be difficult for LHAs to demonstrate compliance with their assessment obligations under Section 8 of the Housing Act 1985 and their duties under the Equality Act 2010 and the Children Act 2004, leaving them open to challenge in the courts. *Medway Council are aware of the need for residential moorings following the appeal in 2024 for such development at Lower Upnor. High concentration in a small area that is expanding-yet policy is not informed by any need assessment. *Policy as drafted states that proposals for further growth of houseboats should have regard to policy T22 marinas and moorings. This is a Transport policy in the Transport chapter. It is not a residential policy.T22 does not assist. A very negative approach to addressing a potential need. *It is far from clear how the specialist needs of those choosing to live on houseboats (often in response to the shortage and high cost of mainstream housing) will be met	6. Housing	6.7 Houseboats	Policy T7: Houseboats	The needs of those living on the 462 plus houseboats on the Medway should have been assessed and policy drafted to ensure proper provision is made to ensure adequate moorings are found in appropriate locations to meet any need that arises in accordance with the Housing Act and legal obligations of the Council.	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4877	Heine Planning	Developers or Agents	The council could and should consider the potential for a Gypsy Traveller sites as part of such a large allocation.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Include provision for a Gypsy Traveller site	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4878	Heine Planning	Developers or Agents	Opportunity exists to incorporate an allocation for at least one Gypsy Traveller site as part of this extensive development.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Ensure provision for Gypsy Travellers	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4879	Heine Planning	Developers or Agents	Questions why so much time, money and effort was spent evicting Travellers from land they owned and occupied off Lower Rainham Road near Riverside Country Park when the Council is now proposing that Lower Rainham be earmarked for new development. Why could provision not be made for a Traveller site?	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Provision should be included for a Traveller site	No	
Online	1482	Online (OPUS)	Mrs Alison Heine [1482]	4880	Heine Planning	Developers or Agents	Provision should be made as part of strategic housing schemes for G&T and this should form part of adopted planning policy. This is especially relevant for proposed developments on the fringe of settlements where lower density housing provision will be planned. The recent (2024) revisions to the planning definition in PPTS and admission by those doing GTAA's, that they have greatly underestimated the need for such sites, suggests that there is a need for improved long term provision to build in more and better safeguards to provision. This will also ensure better integration of Travellers with mainstream housing provision and better access to services and facilities. It will also provide more choice of location and	14. Site Allocations	14.1 Introduction	Paragraph 14.1.2	Need to ensure provision for Gypsy Traveller sites as part of strategic housing allocations.	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4807	N/A	Members of the Public	Changing medway green belt policy. Causing urban Sprawl. How has the land been changed to grey belt without consultation and against national planning policy.	4. Natural Environment	4.1 Introduction	Paragraph 4.1.1	Land is currently used for farming, so why has it been reclassified ?	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4809	N/A	Members of the Public	Strood west parcels 1-4 do not have the infrastructure to cope with such large developments. The fuel pipeline runs along the back of the field and should not be built on or around.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.5	Adequate infrastructure, another hospital as medway is already over run. More schools as school places are already at maximum capacity. Doctors surgeries are closing need more with current population, let alone with more residents	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4813	N/A	Members of the Public	*Failure to adopt brownfield sites first. *Erosion of green belt. *Inadequate infrastructure. *Poor air quality.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.1	Changing medway green belt policy. Causing urban Sprawl. How has the land been changed to grey belt without consultation and against national planning policy.	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4815	N/A	Members of the Public	Infrastructure in place cannot cope now let alone with more development. As soon as there is an accident on the A2 London bound north Strood is one big traffic jam.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.2	Roads need to be able to cope.	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4817	N/A	Members of the Public	Green belt agricultural land.	14. Site Allocations	14.7 Strood West	Paragraph14.7.3	Green belt should not be built upon.	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4819	N/A	Members of the Public	Gravesend does not close their consultation until after Medway has closed. So how this is already decided is worrying.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.5	N/A	No	
Online	1543	Online (OPUS)	Mrs Alison Stiling [1543]	4821	N/A	Members of the Public	Inadequate infrastructure and doctors to cope. Long term air pollution.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Do not build houses on those site	No	
Online	1651	Online (OPUS)	Mrs Ann Blazeby [1651]	4965	N/A	Members of the Public	Objection and querying infrastructure delivery to match housing numbers, loss of open space, green spaces and impact on wildlife.	1. Overview	1.2 Medway area	Paragraph 1.2.2	Stopping it! Apart from that, access points should be changed. The Gravesend road would be more appropriate as this would not encroach on the local residents and already very congested roads.	No	

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Online	1597	Online (OPUS)	Mrs Ann Buttle [1597]	4590	N/A	Members of the Public	Warns that proposed access routes and homes will worsen traffic congestion and criticises assumptions about walkability due to steep terrain; fears loss of village character.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	This is currently Green Belt Land. If you comply with the current Green Belt policy laid down in NPPF then this proposal will not go ahead.	No	
Online	1597	Online (OPUS)	Mrs Ann Buttle [1597]	4591	N/A	Members of the Public	Argues that the proposed development on greenbelt land violates multiple NPPF policies and that the land still serves its original greenbelt purposes.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Paragraph 4.3.1	Retain this land as Green Belt and relocate the additional housing requirements on other land in Medway that is NOT pure Green Belt. There are other areas where the impact of such a large development would be minimal on humans, wildlife and the environment	No	
Online	667	Online (OPUS)	Mrs Carol Thorndycraft [667]	4481	N/A	Members of the Public	Wrong to destroy agricultural land which is needed to avoid more importing of our food & losing self reliance. This housing should not be built until the infrastructure to support it is in place, including water/sewage and health services. Health services are already lacking. Plans for these houses should include predominately affordable housing.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.4	Scale down the number of houses & protect as much farmland as possible	No	
Online	1475	Online (OPUS)	Mrs Carole Polly [1475]	4334	N/A	Members of the Public	Need for road improvements in Medway prior to additional home building. Hoo peninsula needs another main road off the peninsula prior to additional home building.	9. Transport	9.1 Vision for access and movement in Medway	Paragraph 9.1.1	Infrastructure first before any houses	No	
Online	1475	Online (OPUS)	Mrs Carole Polly [1475]	4335	N/A	Members of the Public	Riverside not accessible by public transport, road improvements required at riverside. Free and additional parking at riverside. Additional parking across Medway.	9. Transport	9.3 Active travel interventions	Paragraph 9.3.3	More green spaces - do not build on any more orchards, capstone park or any more riverside developments. Once Rochester was a nice river walk now it's a London borough of flats without its green spaces where is Medway green park, Clapham Common, etc.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4394	N/A	Members of the Public	The Making Space for Nature plan couldn't align, as it prevents housing-nature conflicts post-consultation.	1. Overview	1.1 Introduction	Paragraph 1.1.1			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4395	N/A	Members of the Public	To consider all elements together is essential.	1. Overview	1.2 Medway area	Paragraph 1.2.1			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4396	N/A	Members of the Public	Nature must be valued equally with people when making decisions that impact environment. Prioritizing short-term politics harms biodiversity, prompting Medway's climate emergency.	1. Overview	1.2 Medway area	Paragraph 1.2.2	Alignment with the Making Space for Nature plan. Also considering that brown field sites can also be extremely useful for wildlife, proper ecological evaluation is needed. For example both a local field and park (Cherry Tree Orchard Park) in Rainham have had verified sightings of the rare Red Shank'd carder bees. The field is to the East of Mierscourt Road, where I think further development is planned and this is where the queen nested in 2025. The 5 rarest bumblebee species all live in the Thames and Medway estuary.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4397	N/A	Members of the Public	Parking is already strained near stop 837, where a bus-only zone is proposed. Garages are too small. Parks like Riverside are vital, especially for low-income families.	1. Overview	1.2 Medway area	Paragraph 1.2.3			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4398	N/A	Members of the Public	Flooding, sewage, water reuse, and energy efficiency highlight urgent infrastructure needs. Medway must upgrade sewage treatment, design drought-resilient homes, and prioritize sustainability to protect all households, not just the vulnerable.	1. Overview	1.2 Medway area	Paragraph 1.2.4			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4399	N/A	Members of the Public	Raising sea defences risks displacing pollinators thriving in pesticide-free earthworks. Habitat creation during construction is vital to protect these insects, especially along areas like Motney Mill, where biodiversity thrives.	1. Overview	1.2 Medway area	Paragraph 1.2.5			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4400	N/A	Members of the Public	Building on wildlife-designated areas harms biodiversity, demoralizes conservation efforts, and erodes public trust. Darland Banks already shows biodiversity loss, and nearby development will worsen environmental damage and discourage future volunteer involvement.	1. Overview	1.2 Medway area	Paragraph 1.2.6			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4401	N/A	Members of the Public	Unreliable buses and poor transport links affect access to work and community. Roadworks expose network fragility. The road network is not resilient - the A249 roadworks proved this - traffic will back up on the A2 and through the Rainham housing areas. The Lower Thames Crossing threatens irreplaceable ecosystems—planting saplings can't replace mature trees and biodiversity.	1. Overview	1.2 Medway area	Paragraph 1.2.7			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4402	N/A	Members of the Public	High housing costs keep adult children at home. Multi-worker households need more parking than they were designed for. Poor-quality housing is unacceptable—everyone deserves safe, adequate homes. Local affordability and infrastructure must support modern living realities.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4403	N/A	Members of the Public	Lack of local career opportunities forces skilled residents to commute or relocate which is not always desired. Well-paid roles like engineering and tech are scarce in Medway in comparison to London. Local jobs matching university skills should be prioritized.	1. Overview	1.2 Medway area	Paragraph 1.2.9			

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Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4404	N/A	Members of the Public	Medway's healthcare access is hindered by poor hospital parking and unreliable buses. Education and childcare fall short, limiting opportunities. Inflexible transport and school policies strain working families and career prospects. School holiday clubs are essential for working parents. ~~Concern that the road network is not resilient~~	1. Overview	1.2 Medway area	Paragraph 1.2.10			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4405	N/A	Members of the Public	Support only if "material considerations" does not mean in practice that the environment, water and sewage capacity, flood protection, or quality standards are pushed aside.	1. Overview	1.2 Medway area	Paragraph 1.2.11			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4406	N/A	Members of the Public	Support, alongside the Making Space for Nature Plan.	1. Overview	1.2 Medway area	Paragraph 1.2.12			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4407	N/A	Members of the Public	The consultation dates and locations did not allow for people with different working patterns.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.3	Robust protections for the environment. The "car" is not the enemy, reducing car usage is important, but to support adults living at home with their parents parking needs to be considered as essential not removed/reduced in housing developments. Better drainage to reduce flooding risk in all parking, whether private or public should be done too. Previous comment housing designs should include grey water reuse and water butts for garden usage. Community planting on housing developments should favour wildlife.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4408	N/A	Members of the Public	Infrastructure should be built prior to housing development but will biodiversity net gain be monitored?	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Robust system to ensure that if developers get opportunities that they fulfil their obligations to the required timelines. This includes making the right number of affordable houses and any flood mitigation, biodiversity nett gain, infrastructure etc. Planning needs to be tough and not give in to developers. Set the right standards and enforce them.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4409	N/A	Members of the Public	Biodiversity and flood protection measures should be followed through properly. Sites around Darland Banks and to the East of Rainham need proper ecological assessments to ensure that the process of building and then the finished developments do not negatively impact wildlife.	14. Site Allocations	14.1 Introduction				
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4410	N/A	Members of the Public	This should include the Making Space for Nature plan.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.8			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4411	N/A	Members of the Public	Lighting impacts can be mitigated by timers/motion sensors. The urban heating effect also needs consideration. The importance of marshes for flood defences and wildlife. Restrictions should be placed on dog walking close to the marshes and all wildlife sensitive areas with legal implications of breaches.	14. Site Allocations	14.5 River Waterfront	Paragraph 14.5.3			
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4412	N/A	Members of the Public	Assuming that poor quality farming land has no biodiversity value is wrong. This land could, significantly improve biodiversity. Developments in this area are on rare chalk grassland. Important to ensure that all grassed areas are planted as meadows not just green grass and managed for wildlife, not just playing pitches.	14. Site Allocations	14.8 Capstone Valley	Paragraph 14.8.4	Consider the North Downs to be a rare chalk based environment and not damn it all to housing (or elsewhere to vineyards) that needs to be enhanced for wildlife, not just take the easy option and build on it. we will never get our biodiversity back if each council does this.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4413	N/A	Members of the Public	Lower Rainham has significant traffic problems. The Leigh Academy has resulted in parents parking on Lonsdale drive due to insufficient parking nearby. Traffic jams on the A2. It may be high value allocation for people, but the northern most field (previous pear orchard now meadow) supports rare red shanked carder bees, solitary bees, butterflies and a large white dead nettle and other plants extremely beneficial to pollinators.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.1	Ecological evaluation of the field mentioned and a plan to support the pollinators and relocation of the white dead nettle before the meadow is destroyed (better still avoid building on this field). Enhance parking for school drop off and encourage walking/cycling for the children.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4414	N/A	Members of the Public	Objects if the parcelling up of the development allows the developers to avoid the biodiversity net gain obligations. The "Garden of England" is valued by residents and one of the few things that Rainham is proud of is its location.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.7	Ensure that biodiversity nett gain is applied to development close to the marsh as we have a healthy population of butterflies (better than Queensdown Warren) at Riverside Country park and also rare bumblebees and solitary bees. building close to the park will potentially impact on the forage opportunities for pollinators living in the park too.	No	
Online	1525	Online (OPUS)	Mrs Clare Marshall [1525]	4415	N/A	Members of the Public	Querying the detail for RES10.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.9			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4495	N/A	Members of the Public	Increase level of build quality and use of renewable energy including retrofitting.	1. Overview	1.2 Medway area	Paragraph 1.2.4			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4496	N/A	Members of the Public	Number of environmental concerns including: rising sea levels mitigation, mass planting to lower temperatures, protection of food growing areas, buffer zoned marsh areas to absorb and slow influx of water and suggests garages underground and at ground floor level may also protect housing and business.	1. Overview	1.2 Medway area	Paragraph 1.2.5			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4497	N/A	Members of the Public	Mix of housing stock is ideal and provides design suggestions including: small houses and flats on larger plots, more community allotments and larger balconies.	1. Overview	1.2 Medway area	Paragraph 1.2.8			

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4498	N/A	Members of the Public	Concern with overdevelopment and loss of local character. Asks if there is an accepted saturation point?	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Can we dictate buffer zones of set distances that allow demarcation between the towns and villages? These could be made up of woods, fields, orchards etc but would need to be more than just a dual carriageway or trainline. I would also like to see the maximum number of homes/buildings Medway considers is viable for our area density listed in the plan. That gives us something to challenge govt with when the	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4499	N/A	Members of the Public	Suggests mixing housing and business areas to encourage growth.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.9			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4500	N/A	Members of the Public	Supports vision for Medway. Requests clarification on where the community-owned, local energy infrastructures are? And where the reduction in car use figures come from?	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4501	N/A	Members of the Public	Housing Design / Renewable energy - asks if mandating house builders to put grey water systems into each house and make integral to the plans that each building collects rainwater is possible?	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4502	N/A	Members of the Public	Need more available water for active use so grey water systems and rainwater harvesting methods need to become normal everyday practices. Need builders buy-in to incorporate into standard design.	4. Natural Environment	4.2 Planning for climate change	Paragraph 4.2.8	Incorporate grey water systems and rainwater harvesting methods into standard housing design		
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4503	N/A	Members of the Public	Asks if specific renewable energy standards be added, over and above govt legislation. Suggests adding requirements on the number of solar panels expected, battery storage, greywater and rainwater systems etc?	5. Built Environment	5.3 Housing design	Paragraph 5.3.5	Suggests adding requirements on the number of solar panels expected, battery storage, greywater and rainwater systems etc?		
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4504	N/A	Members of the Public	Suggests design of shop front could improve "visage".	5. Built Environment	5.5 Shopfront design and security	Paragraph 5.5.7			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4505	N/A	Members of the Public	Suggests spray painting shop shutters to advertise itself when closed.	5. Built Environment	5.5 Shopfront design and security	Paragraph 5.5.11	Spray painting shop shutters to advertise itself when closed.		
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4508	N/A	Members of the Public	More affordable homes needed, suggests housing mix should be 50/50.	6. Housing	6.2 Housing mix	Paragraph 6.2.3	Change housing mix, Affordable Housing 50/50.	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4511	N/A	Members of the Public	First homes- Concern raised over viability issues, affordability and issues around re-sale. Housing that people can afford required.	6. Housing	6.3 Affordable housing	Paragraph 6.3.3	Social housing percentages increased on each new housing development to 20% and affordable housing added on top of that to 50%, across the board. This helps young farmers and labourers in rural locations as well as immigrants and low-paid workers in more urban areas.	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4512	N/A	Members of the Public	Support for supported housing to free up units for families but raises issue of affordability for older persons.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Paragraph 6.4.23			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4513	N/A	Members of the Public	Support for purpose built student accommodation for student social interaction and to limit anti-social issues.	6. Housing	6.5 Student accommodation	Paragraph 6.5.8			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4514	N/A	Members of the Public	Strong support for greenlink linking Gillingham TC and waterfront. Prioritise this option. Good for tourism, greening area and tackling road pollution	8. Retail and Town Centres	8.9 Gillingham district centre	Paragraph 8.9.8			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4515	N/A	Members of the Public	Concern over time taken to develop former council office site in Strood.	8. Retail and Town Centres	8.10 Strood district centre	Paragraph 8.10.6			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4516	N/A	Members of the Public	Developer contributions to be triggered at each stage and each site finished/completed.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.8			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4517	N/A	Members of the Public	Querying how stakeholders will be informed about funding of developments (via DM process).	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.11			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4518	N/A	Members of the Public	Querying how transport mitigation funding is paid for if trip generation is lower than predicted. How is discount corrected?	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.14			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4519	N/A	Members of the Public	Support for early delivery of cycling/walking network for area and health benefits.	9. Transport	9.3 Active travel interventions	Paragraph 9.3.5			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4520	N/A	Members of the Public	Support for Grain Branch line	9. Transport	9.4 Grain Branch	Paragraph 9.4.7			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4521	N/A	Members of the Public	Support for retention of Chatham Docks for materials import/export	9. Transport	9.5 Riverside infrastructure	Paragraph 9.5.4			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4522	N/A	Members of the Public	Suggestion of airfield on Hoo Peninsula to support tourism and aviation heritage .	9. Transport	9.7 Aviation	Paragraph 9.7.4	Move the airfield from Stoke, where it isn't practical, to somewhere nearer the edge of the coast.	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4523	N/A	Members of the Public	Suggestion of vacant sites on Gillingham Business Park for logistics sector to tackle employment space lost to residential.	9. Transport	9.8 Urban logistics	Paragraph 9.8.5			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4524	N/A	Members of the Public	Suggestion of grammar school system and selective primary school overriding the local neighbourhood service principle and causing traffic congestion. Need for use of local schools by resident pupils.	9. Transport	9.10 Accessibility standards	Paragraph 9.10.1			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4525	N/A	Members of the Public	Suggestion of need for more allotments to avoid people having to travel to allotments. Better facilities for social interaction on allotments.	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Paragraph 10.3.11			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4526	N/A	Members of the Public	Better education to increase waste recycling and make more economical.	12. Waste Management	12.1 Introduction	Paragraph 12.1.39	We will continue to actively promote and reward constructive recycling that financially off-sets rubbish collection costs. What is left after that, as truly inert waste - actually very small once recycling is taken out - can be burned for energy like biogas is	No	

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Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4755	N/A	Members of the public	Suggests green waste be composted locally and incentivise people to separate their food waste.	12. Waste Management	12.1 Introduction	Paragraph 12.1.19			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4756	N/A	Members of the public	Suggests labelling other recovery in Table 3 as incineration or burning to allow full engagement on the issue.	12. Waste Management	12.1 Introduction	Table 3: Management of LACW arising in Medway (2018/19 to 2022/23)			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4854	N/A	Members of the Public	Disagrees that we will only be able to manage half the RDF we are currently 'producing'. The schemes Medway has in place for waste are so good that almost nothing should need to go for burning.	12. Waste Management	12.1 Introduction	Paragraph 12.1.39	Currently 400,000 tonnes RDF is more than can be dealt with locally within Medway so we will limit black sack collection to 2 bags per household per week and allow unlimited brown bin and recycling bag collection each week. Planning permission has been granted for an Energy Centre as part of the 'Medway One' redevelopment of the old Kingsnorth power station site which could accept up to c200,000tpa of refuse derived fuel (RDF) or solid recovered fuel (SRF). With this proven market in RDF, all energy produced will be used to power homes and businesses locally and the building exterior will be used as a community facility, similar	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4875	N/A	Members of the Public	Highlighted a lot of money seems to be required from outside of Medway Council and developers. Concerned about maintenance of green transition edges of development. Suggests use of allotments/more intimate community growing gardens / shared private gardens	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4881	N/A	Members of the Public	Suggests with a falling birth rate, schools will not be needed. Also suggest the developer money could be better spent on a mix of housing, more social housing and allotment plots to support the social housing	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4894	N/A	Members of the Public	Queried why this development is not considered as an extension of Lower Rainham.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.5	With some tweaks to the planned layout, it could be incorporated into the existing village and enhance rather than detract. The community area should be as near as possible to the local pub and restaurant.	No	
Online	1564	Online (OPUS)	Mrs Elizabeth Poynter [1564]	4902	N/A	Members of the Public	Concern raised over loss of agricultural land, transport links, traffic capacity and congestion. Concern also raised about infrastructure.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Local train station put in at Twydall. Lower Rd treated as village centre. More allotments as waiting list is so high for them. More self build options on generous plots. Heritage views and roads respected. No schools. Guaranteed bus services and train link.	Yes	Because none of the developers live in the local area and do not understand the reality of what is faced each day.
Online	24	Online (OPUS)	Mrs Elizabeth Turpin [24]	4587	N/A	MPs, Members and Parish Councils	Concerns regarding housing targets with no arguments against the target numbers, and employment land, particularly housing growth around Hoo Peninsula and loss of rural character. Concern also raised over lack of infrastructure and costing. Also concerned about loss of Green Belt with no evidence Gravesham will build on this area to the west of Strood. Concern also raised there is not sufficient Gypsy and Traveller provision with the report not showing reality on the ground. Loss of employment land at Chatham Docks and Medway City Estates was also a	Regulation 19 Consultation		Paragraph 10 - Chapter 7	Firstly and most importantly there needs to be an acceptance that Medway is unable to deliver the Housing targets that have been dictated to them by central government. these targets to not take into account the area, only a percentage increase. So if you are already highly populated, you just have to become even more over populated. Do not build houses on successful employment land, i.e. Chatham Docks and Medway City Estate.	Yes	I would like to give my representations in person.
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4838	N/A	Members of the Public	Suggests changes including more sympathetic historical architecture, infrastructure to allow for expansion of residential properties, and increased healthcare infrastructure to support development.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds	The plan for the Chatham area needs to look at how the proposed sites can be modified in line with local architecture and not to permit random designs with now sympathy to the historic architecture of the historic naval town. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents?	Yes	-
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4839	N/A	Members of the Public	The plan for Riverside area needs to look at how the impact of such a development would truly benefit health of residents of Medway.	14. Site Allocations	14.5 River Waterfront	Paragraph 14.5.1	The proposed plans to develop Gillingham Marina will impact the boating community on the River Medway and beyond. The services offered to berth holders, visitors and boat owners across the south east will be hugely impacted. As Medway Council are still to complete their River Strategy it is irresponsible to consider this land without a robust strategy in place for the river. The plan already identifies its need to detour at the Dock so this idea can be continued for coastal pathway to pass by the front of the marina on Pier Road. The nautical heritage of Medway requires to be considered in the Riverside plans - current river assets have been removed by the Council and therefore the private ventures on the river need to be supported and allowed to grow. Visitors from England and Europe regularly use the Marina and its services on site bringing visitors to Medway. Their economic impact can not be disregarded. Gillingham Marina is not a brownfield site and should not be considered for any change of use/residential development.	No	

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Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4840	N/A	Members of the Public	Objects to the proposed sites. Suggests changes including more sympathetic historical architecture, infrastructure to allow for expansion of residential properties, and increased healthcare infrastructure to support development.	14. Site Allocations	14.6 Strood Town Centre and Surrounds	Policy SA5: Strood Town centre and Surrounds	The plan for the Strood area needs to look at how the proposed sites can be modified in line with local architecture and not to permit random designs with now sympathy to the historic architecture of the historic naval town. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents?	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4841	N/A	Members of the Public	I object to the change in use and reduction of greenbelt land.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	The plan for the Strood area needs to look at how the proposed site benefits the local residents with the destruction of greenbelt land. With one of the local plans key principles to be prepared for climate change then the destruction greenbelt & agricultural land breaks those ideas. All green land and agricultural sites should be preserved and protected from development. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents?	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4843	N/A	Members of the Public	I object to the proposed plans for this area.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	The plan for the Capstone area needs to look at how the proposed site benefits the local residents with the destruction of greenbelt land. With one of the local plans key principles to be prepared for climate change then the destruction greenbelt & agricultural land breaks those ideas. All green land and agricultural sites should be preserved and protected from development. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents? As stated in the supporting documents the areas provides a green buffer on the Kent Downs and therefore needs to remain a buffer. Offering appropriate support for increasing biodiversity in the area will enrich this	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4845	N/A	Members of the Public	I object to the over development of an area that has a community that is one of the last remaining rural areas of Medway.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	The plan for the Hoo area needs to look at how the proposed site benefits the local residents with the destruction of greenbelt land. With one of the local plans key principles to be prepared for climate change then the destruction greenbelt & agricultural land breaks those ideas. All green land and agricultural sites should be preserved and protected from development. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents?	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4846	N/A	Members of the Public	I object to the need to develop a small community focused village with such a large number of houses.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	The plan for the High Halstow area needs to look at how the proposed site benefits the local residents with the destruction of greenbelt land. With one of the local plans key principles to be prepared for climate change then the destruction greenbelt & agricultural land breaks those ideas. All green land and agricultural sites should be preserved and protected from development. Current infrastructure does not allow for expansion of residential properties in the area. The NHS provision, including GP's dental and hospital can not support the current population of the area so how will it all support and increase in residents?	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4848	N/A	Members of the Public	I object to the over development of an area which already is unable to support the current development on the site.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	The plan to support business who suffer from flooding is a sound idea, however it highlights the issue that flood plains across Medway are not suitable for development.	No	
Online	1632	Online (OPUS)	Mrs Emma Aldous [1632]	4849	N/A	Members of the Public	I object the adoption of the land listed.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites	The current infrastructure and services through the NHS are extremely limited and any increases to the population in the area will be detrimental. A new hospital needs to be considered and built before any land is available for development.	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4792	N/A	Members of the Public	Claims the Employment Land Needs Assessment is flawed, figures and site allocations are unjustified, ineffective, and inconsistent with national policy, relying on inflated demand projections, constrained strategic sites, and over-specialisation. Speculative allocations may likely remain vacant or underused risking wasted investment.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.8	Recommended Changes to the Plan Without substantial modification, the current allocations (204,000 sqm industrial and 36,500 sqm office space) are unsound. The Council should: Yes. Demonstrate sound joint scenario testing with neighbouring authorities to ensure projections are realistic and collaborative, reflecting cross-boundary economic trends. 2. Prioritise regeneration and intensification of existing employment sites and brownfield land before releasing greenfield or environmentally constrained sites. 3. Provide a diverse portfolio of sites of varying sizes and types, supporting a range of businesses and enabling adaptability to sectoral shifts. 4. Implement phased release of strategic sites at Grain and Kingsnorth, contingent on infrastructure delivery, environmental mitigation, and confirmed market demand. 5. Integrate employment land strategy with skills and training initiatives, ensuring the local workforce can support emerging sectors such as low-carbon energy and digital industries. 6. Restrict strategic coastal and Green Belt land release to exceptional circumstances only, requiring: -Demonstration of no suitable brownfield or non-Green Belt	Yes	Present local opinion and evidence beyond the papers
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4795	N/A	Members of the Public	Criticises reliance on interim environmental assessments and lack of transparency in consultation; warns of legal non-compliance.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.12	Completion of Environmental Assessments Prior to Submission The Plan must include a finalized Habitat Regulations Assessment (HRA) that incorporates the outstanding air quality assessment. This is essential to comply with the Conservation of Habitats and Species Regulations 20Yes7 (as amended) and to demonstrate that environmental impacts have been thoroughly assessed and adequately mitigated before Plan submission. Transparency in Consultation Feedback and Alternatives Assessment Clear evidence should be provided showing how feedback from consultations on the interim Sustainability Appraisal (SA) and HRA reports has substantively influenced Plan revisions. Additionally, the Plan should transparently document the consideration and rejection of all potential sites and reasonable alternatives, confirming that the process has been comprehensive. Full Compliance with Legal Consultation Requirements It is critical that all consultation processes meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The Plan should evidence meaningful engagement and cooperation with key statutory consultees and relevant authorities, particularly regarding air quality and habitat protection concerns. Enhanced Coordination Between Authorities Given the cross-boundary nature of habitat and air quality	Yes	As a resident of Medway, I have a direct and personal interest in the development and implementation of local policies that will impact my community's environment, quality of life, and future growth.
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4796	N/A	Members of the Public	Plan lacks evidence of cooperation with neighbouring authorities and fails to address cross-boundary environmental impacts. Potential non-compliance with legal duty.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.1	Without amendments, there is a risk that the Plan will fail to meet the Duty to Cooperate requirements set out in the Planning and Compulsory Purchase Act 2004 (as amended) and associated regulations, which would undermine its legal compliance and soundness. We therefore urge Medway Council to revise the Plan accordingly to provide clear, demonstrable, and enforceable commitments to effective cooperation on strategic, cross-	Yes	Resident of Medway
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4797	N/A	Members of the Public	Plan fails the Duty to Cooperate with Gravesham and lacks clarity on housing need, affordability, and greenbelt justification.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3	Provide documented, binding agreements with Gravesham Borough Council confirming how unmet housing needs will be met cooperatively. Review and clearly justify housing targets to reflect local and cross-boundary needs accurately, excluding inflated assumptions from London overspill. Include robust, evidence-based justification for any Green Belt boundary changes Strengthen policies addressing housing quality and affordability, including HMOs and minimum space Without these changes, I consider the Plan unsound and at	Yes	Medway resident; woman; directly impacted by policy.

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4799	N/A	Members of the Public	*Highlights contradictions between the Plan's vision and delivery policies, especially around infrastructure, HMOs, and equality impacts– omission of sex-based Impacts, ignores women's disproportionate exposure to housing insecurity, unsafe public space, poor lighting, and limited active travel access. *No phased, funded Infrastructure Delivery Plan is included. *No binding retrofit-first policy exists. *No controls exist on HMOs or exploitative retail that undermine community safety and cohesion. The Vision's commitments to net zero, circular economy, and inclusive high streets have no enforceable KPIs or binding policy links.	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041	Link Vision Outcomes to Binding and Measurable KPIs Each Vision outcome should be explicitly connected to specific, binding Key Performance Indicators (KPIs) that are measurable, time-bound, and publicly reported. This will ensure transparency and enable robust monitoring of delivery progress, as required by the NPPF and best practice in plan implementation. Embed a Retrofit-First and Brownfield Prioritisation Approach The Vision should commit to a 'retrofit-first' strategy that prioritizes the refurbishment and carbon-efficient upgrading of existing buildings ahead of new development. It must also prioritize brownfield land redevelopment over Green Belt release, in line with sustainability principles and NPPF directives. Incorporate Robust Housing Quality and Control Measures The Vision should explicitly reference the adoption of strong controls on HMOs and other housing types through policies such as Maidstone-style Supplementary Planning Documents (SPDs) and automatic Article 4 Directions. This will support high-quality, inclusive housing delivery consistent with NPPF paragraphs 62–64. Commit to Comprehensive Equality Impact Analysis The Vision must include a commitment to embed comprehensive equality impact assessments across all plan themes, including sex-based analysis, to ensure policies	Yes	I wish to participate in the hearing session(s) because the issues raised in my representation are critical to ensuring that the Medway Local Plan is sound, legally compliant, and capable of delivering sustainable and equitable growth. Without active involvement, there is a significant risk that key concerns—such as insufficient housing quality controls, insufficient consideration of sex based impact to residents, and inadequate safeguards against social and environmental harms may be
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4802	N/A	Members of the Public	Claims environmental protections are undermined by development in sensitive areas; criticises lack of binding mitigation and legal compliance - Failure to demonstrate compliance with the Habitats Regulations.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Requested Modifications to Make the Plan Sound Withdraw site allocations (particularly in the Hoo Peninsula and Kent Downs buffer) where adverse effects on designated sites and landscapes cannot be ruled out. Complete and publish a full Habitats Regulations Assessment prior to submission. Finalise the Kent and Medway LNRS and incorporate its mapped priorities into site selection and mitigation policies. Create a deliverable Biodiversity Net Gain strategy for Medway, with on-site priority, habitat banking, and enforceable monitoring measures. Add clear KPIs and enforcement mechanisms for Policies SYes and S2 (e.g., canopy cover targets, SuDS installation rates, habitat restoration acreage). Strengthen Duty to Cooperate evidence, with updated and signed Statements of Common Ground with key statutory bodies and neighbouring authorities.	Yes	Medway resident impacted by plan

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4803	N/A	Members of the Public	Health, biodiversity benefits and economic gains from accessible greenspaces are unrealistic due to poor infrastructure and lack of safe, sustainable access.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Paragraph 4.6.12	Development proposals and local authority initiatives shall prioritize the provision of affordable, sustainable transport links to key greenspaces. This includes the support and expansion of low-cost shuttle services, enhancement of public transport routes, and integration with wider transport networks to reduce reliance on private vehicles. Safe and Environmentally Sensitive Active Travel Infrastructure: design and implementation of safe, well-lit walking and cycling paths that facilitate access to greenspaces. Such infrastructure must be sensitively designed to avoid disruption to natural habitats and local communities, employing eco-friendly lighting and materials to minimize environmental impact. Community Engagement and Environmental Stewardship Planning and delivery of access routes and related infrastructure must involve meaningful engagement with local residents and stakeholders to ensure alignment with community needs and environmental preservation. Initiatives that encourage local stewardship and maintenance of greenspaces and paths will be supported. Traffic Management Near Greenspaces Sound measures to mitigate traffic congestion and improve road safety around key greenspace areas . -park-and-ride schemes, improvements to road infrastructure that align with environmental and community priorities. -Infrastructure projects enhancing access to greenspaces	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4804	N/A	Members of the Public	Criticises vague language in landscape protection policies and lack of measurable enforcement; warns of inequity in deprived areas - communities facing deprivation often have less influence in planning decisions and limited access to greenspace, which undermines the social equity goals of landscape policies	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape	Include independently verified landscape impact assessments and public consultation outcomes. Follow a strict mitigation hierarchy prioritizing avoidance of adverse impacts on designated features. Demonstrate how they improve equitable access to the National Landscape for all local communities, particularly those facing deprivation. Commit to ongoing post-development monitoring, with clear mechanisms for enforcement, remediation, and penalties for non-compliance. Be reviewed in conjunction with relevant skills development initiatives within the planning authority to maintain	Yes	To observe planning process conducted with full transparency and impartiality. It is important that all proposals undergo thorough and objective scrutiny, free from undue influence, to uphold public trust and achieve the best outcomes for the community.
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4805	N/A	Members of the Public	Argues greenbelt release is unjustified and that high-quality farmland should be protected; criticises lack of sustainability evidence.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4	Demonstrate confirmed infrastructure funding and delivery plans linked to allocations. Avoid premature release of greenfield or grey belt land ~~based on aspirations rather than substantiated need~~.	Yes	Resident. To observe transparent, fair process.
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4806	N/A	Members of the Public	Warns of piecemeal development eroding Greenbelt and biodiversity; criticises vague definitions and loopholes that allow inappropriate development	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.6	Clearly define “inappropriate development” with specific, enforceable criteria; Address imbalances in housing supply, ensuring affordable housing is delivered in suitable forms and locations; Close procedural loopholes that allow the piecemeal loss of green spaces; and Protect green belts and gaps in line with the spirit and letter of planning policy.	Yes	Medway resident

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4811	N/A	Members of the Public	*Insufficient Consideration of Crime Prevention through Environmental Design. *The proposed housing allocations, especially in suburban and rural expansions, risk creating pockets of social isolation without sufficient services. *Allocations on greenfield sites including sensitive areas like west Strood and Capstone Valley lack sufficiently detailed assessments on impacts to biodiversity, agricultural land and flood risk. *Failure to clearly define and protect against urban coalescence. *The Chatham Waters project- concerns that foreign investment could drive up property prices. *There is limited evidence of effective public consultation outcomes being integrated into spatial allocations and-use allocations may be unsound and inflexible. *Evidence on housing and infrastructure needs is weak and unverified. *Reliance on greenfield development undermines sustainability - greenbelt/greenfield impacts on nature and farmland . *The apparent on aspirational housing targets and incomplete evidence on infrastructure delivery raises questions over whether the plan meets these legal tests and lack consultation outcome incorporation. *Greenfield allocations raises flood and habitat risks with vague protections. Missing cross-authority infrastructure commitments risk uncoordinated growth.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.4	Provide robust, independent evidence demonstrating actual housing and infrastructure needs, viability of brownfield regeneration sites, and full funding commitments. Include detailed, enforceable environmental mitigation and monitoring measures for greenfield and sensitive land releases. Clarify and legally formalize cross-border infrastructure and service delivery agreements with neighbouring authorities. Define measurable criteria and clear policies to prevent urban sprawl, protect Green Belt integrity, and maintain the identity of villages and open countryside. Ensure comprehensive, transparent consultation records and responses are publicly accessible and integrated into the plan's evolution. Explicitly integrate safeguarding objectives, referencing the Children Act and related legislation, into spatial planning policies. Ensure provision of safe, accessible community spaces and infrastructure designed with children's safety and wellbeing as a priority. Adopt and enforce CPTED principles in all housing developments and public realm improvements.	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4812	N/A	Members of the Public	Lack of clear, measurable delivery mechanisms. Over-reliance on greenfield and large-scale strategic sites without adequate infrastructure assurance. Ambiguous commitments on modal shift and sustainable travel. Inadequate safeguarding of the green belt. Insufficient evidence of community engagement and social impact consideration. Potential conflict with environmental legislation.	3. Spatial Development Strategy			Clear, Measurable Delivery Mechanisms The plan must establish specific, binding targets and timelines for critical objectives such as net zero carbon emissions, biodiversity net gain, and modal shift to sustainable travel. A robust monitoring framework with enforceable delivery triggers will ensure transparency, accountability, and responsiveness throughout the plan period. Infrastructure Guarantees for Strategic and Greenfield Sites Allocations of greenfield and large-scale strategic sites must be conditional upon secured, phased infrastructure delivery—including schools, healthcare, transport, and utilities—to prevent undue burden on existing communities and to uphold sustainable development principles. Inclusive and Safe Sustainable Travel Provisions References to reducing car reliance and encouraging active travel require strengthening through specific, funded policies mandating safe, continuous, well-lit, and accessible walking and cycling routes and affordable, safe public transport. Designs must explicitly address sex based vulnerability-related safety concerns, informed by relevant evidence and case studies. Robust Justification and Protection of the Green Belt Any proposed release of Green Belt land must be supported by comprehensive evidence demonstrating that all reasonable alternatives have been exhausted. The plan	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4825	N/A	Members of the Public	Highlights the mismatch between projected housing delivery and market realities. Notes a 17% increase in homes ordered but not bought and warns that high pricing of new builds will lead to unsold stock and stalled development. creates a mismatch between the Plan's projected housing completions and what is realistically deliverable, undermining the "effective" soundness test.	6. Housing	6.3 Affordable housing	Paragraph 6.3.8	Require market absorption analysis as part of major site allocation justification. Include contingency measures to adjust phasing and tenure mix where new-build sales rates slow. Encourage inclusion of more affordable, mid-market, and local needs housing to ensure consistent uptake	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4827	N/A	Members of the Public	Plan is unsound due to conflation of local housing need with London migration spillover. Criticises lack of infrastructure phasing, poor housing quality, and absence of Article 4 controls. Calls for disaggregation of housing demand and stronger regulation of HMOs.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	Minimum room size, daylight, amenity, bin storage & per bedroom parking Licensing alignment to disincentivise non compliance Mandatory Circular Economy Statements with auditable KPIs Demolition material salvage and local reuse targets Improved HMO standards Maidstone Benchmark & Article74 Trigger Without robust controls, Medway risks HMO saturation, rogue conversions, and transient, low cohesion communities. Adopt Empty Homes & Retrofit First Policy with: Reoccupation incentives and CPO powers Carbon efficient restoration before demolition Prioritisation of brownfield and vacant stock ??Yes0% landfill by 2035 compliance Heritage, Local Skills, and Material Reuse: Plan favours demolition/new build over retrofit and reuse, undermining NPPF Yes97?202.	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4828	N/A	Members of the Public	Criticises the lack of a clear methodology for assessing housing need and absence of alignment with local health data. Highlights policy loopholes around accessibility and design standards and calls for: *Needs assessments to be based on the most recent JSNA and Kent & Medway health and social care demand data. *Define quantitative accessibility standards (e.g., 400m to bus stop). *Link dementia-friendly provision to recognised national design standards and require independent certification. *Include policy wording to secure local skills and care sector training contributions from developers. *Require independent verification of "no need" evidence before approving loss of specialist housing.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Require needs assessments to be based on the most recent JSNA and Kent & Medway health and social care demand data. Define quantitative accessibility standards (e.g., 400m to bus stop, 800m to local shop). Link dementia-friendly provision to recognised national design standards and require independent certification. Include policy wording to secure local skills and care sector training contributions from developers. Require independent verification of "no need" evidence before approving loss of specialist housing.	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4830	N/A	Members of the Public	Argues the policy lacks measurable limits on density, environmental capacity thresholds and monitoring mechanisms. Warns that vague language will lead to inconsistent enforcement and legal challenges. Terms like "design enhancement" and "appropriate landscaping" are inherently unenforceable without detailed design codes or binding supplementary guidance.	6. Housing	6.6 Mobile Home Parks	Policy T6: Mobile Home Parks	Clearly define density limits, environmental thresholds, and design standards. Close loopholes that allow intensification to circumvent environmental protections. Embed binding design codes and site-specific limits into the policy or supplementary planning documents.	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4831	N/A	Members of the Public	Plan fails to prevent HMO clustering and protect family housing. Criticises lack of measurable criteria and warns of policy capture by investors, undermining housing mix and community trust. Not consistent with national policy.	6. Housing	6.8 Houses of Multiple Occupation	Policy T8: Houses of Multiple Occupation	Define "over concentration" with a clear numerical threshold and mapping methodology. Establish a borough-wide HMO register to track stock and monitor compliance. Strengthen "family housing" definition to protect units of 3+ bedrooms with adequate gardens and storage. Expand amenity requirements to include natural light, outdoor space, and sound insulation standards. Tie parking and traffic assessments to Medway's Parking Standards SPD. Include an explicit conflict-of-interest safeguard requiring national and local decision-makers to declare and recuse	Yes	Medway resident

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4832	N/A	Members of the Public	Opposes intensification of the Cuxton public site due to lack of environmental and amenity assessments and community consultation. Argues the Plan lacks legal and evidential foundation without an updated GTAA.	6. Housing	6.10 Gypsy, Travellers and Travelling Showpeople	Policy T10: Gypsy, Travellers & Travelling Showpeople	Publish and integrate the most recent GTAA findings into the Local Plan, with site allocations and phasing clearly linked to identified need. Define explicit, measurable criteria for new sites, consistent with PPTS para. 11, to ensure transparency and legal robustness. Require full environmental and amenity assessments before any intensification of existing sites, including Cuxton. Consider a dispersed site strategy to avoid over-	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4834	N/A	Members of the Public	*Policy S10 says where employment should go but has no way to guarantee delivery. *Policy S11 acknowledges employment land can be lost to housing without needing planning permission. *The plan isn't effective or realistic. *Past council projects show a pattern of failure to deliver promised jobs or economic benefits. *Economic projections are unsupported by market evidence. *The Local Plan's employment strategy is not effective or realistically deliverable. *Evidence from Medway Council's own delivery history demonstrates repeated failure to convert allocated employment land and public investment into productive economic activity.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Provide an updated evidence base that reflects the actual viability of strategic economic sites, not speculative projections. Requested Modifications To achieve soundness, the following should be addressed: Review employment allocations in light of delivery track record and market demand. Reconsider surplus employment allocations where history shows no realistic prospect of uptake Introduce robust delivery mechanisms (e.g., phased delivery, binding developer commitments, clawback for	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4836	N/A	Members of the Public	Fails to meet key NPPF requirements (paras 20, 35, 36, 85, 92, 16c). No clear or enforceable plans for delivering education and skills. Doesn't tackle the decline of small businesses (SMEs) and retail. Argues the Plan fails to support town centres and SMEs, and lacks enforceable measures to address retail decline. Warns of socio-economic consequences from low-quality shops and reduced diversity.	7. Economic Development	7.3 Existing employment provision	Paragraph 7.3.4	Publication of the Education IDP alongside adoption, with funding stacks (SYes06/IL, DfE, LA) and backstop mechanisms if viability delays delivery. Mandatory Local Employment & Skills Plans for major schemes, with KPIs for local apprenticeships, basic skills/digital training hours, and employer partnerships. Retail/Town Centre Quality Framework Use-class diversity targets in key centres, with thresholds for takeaways, low-quality convenience stores, and other identified low-value uses. Design quality standards for retail premises linked to active frontages, accessibility, and crime prevention. Developer contributions to public realm, lighting, and CCTV	Yes	Medway resident suffering consequence of poor quality controls and planning
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4842	N/A	Members of the Public	Criticises allocation of greenfield employment land despite stated preference for brownfield. Calls the contradiction unsound and environmentally irresponsible.	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15.7	This isn't just a case of poor planning — it's a self-defeating, regressive, and environmentally irresponsible employment strategy that could actively harm Medway's communities and ecosystems, while failing to meet actual economic needs	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4847	N/A	Members of the Public	Criticises the public consultation process, noting only ~400 responses per stage (less than 0.15% of the population). Claims materials were promotional and biased, omitting key negatives like farmland loss, housing market absorption risks, infrastructure deficits, and potential concentration of low-value land uses. The Interim Sustainability Appraisal acknowledges significant negative effects, These were either absent or reframed as “challenges” in the public-facing materials. Argues this undermines informed engagement and legal soundness.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.3	Evidence Base Deficiencies: Relies on outdated or incomplete assessments (e.g., 20Yes8 GTAA, partial infrastructure modelling, no transparent market absorption analysis). Public consultation materials minimised or omitted significant negative impacts documented in technical evidence, breaching the fairness principles established in R (Moseley) v Haringey LBC [20Yes4] UKSC 56. Modification Sought: Full withdrawal of the current draft Local Plan, with recommencement of the process from Regulation Yes8 stage. Production of an updated and complete evidence base before consultation, including GTAA, infrastructure capacity plans, and independent housing market absorption analysis. Independent review of consultation materials to ensure neutrality and accessibility, with targeted outreach to under-represented groups. Until these steps are taken, the Plan cannot be considered	Yes	Transparency

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4850	N/A	Members of the Public	Says the Plan's alignment with wider strategies (e.g. Health & Wellbeing, Climate Action) is superficial and contradicted by allocations on high-quality farmland. Notes consultation disproportionately reflected developer interests. The Regulation 18 consultations reached fewer than 0.15% of the population.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.1	This part of the plan should clearly commit to: Using a complete and up-to-date evidence base for all decisions, with each technical report updated within the last two years. Avoiding the loss of the best farmland, green space, heritage sites, and key employment land unless there is no other option and clear public benefit. Linking new housing to infrastructure that is delivered before or alongside occupation — not years later. Enforcing high building and design standards that meet national space, environmental and accessibility rules. Preventing over-concentration of HMOs or other low-value uses that reduce neighbourhood quality. Ensuring the plan is consistent with the Council's own climate, health, and economic strategies — with no site allocations that conflict with them Making sure residents' needs come first — homes, jobs,	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4851	N/A	Members of the Public	The NPPF requires that the standard method be the starting point for determining housing need, not the end point. Local Plans must then consider whether there are exceptional circumstances that justify a higher or lower figure. Criticises outdated evidence base and lack of transparency.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Amend Yes.3.5 to clearly state that the standard method is the starting point; publish updated, independent housing need evidence; and test the figure against Medway's constraints and delivery capacity before finalising allocations.	Yes	Resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4852	N/A	Members of the Public	Lack of access to final HRA evidence, especially given known air quality issues. SEA Regulations failing to assess reasonable alternatives equally.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.12	Delay Regulation Yes9 until the HRA is complete and air quality impacts are assessed and consulted on. Re-run the SA to ensure reasonable alternatives are assessed and presented without bias. Publish a non-technical, balanced summary of significant adverse effects alongside the technical SA and HRA to enable informed public comment.	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4853	N/A	Members of the Public	Warns that the Duty to Cooperate has not been met, citing legal precedents where similar failures led to plan withdrawal. Criticises retrospective engagement and lack of Statements of Common Ground.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.4	If there's no published evidence that neighbours agree with Medway's housing number/spatial strategy (or that cross boundary impacts are resolved), the plan is at serious legal risk at Examination, just like the authorities above. Recommend withdrawal/non-adoption (see Horsham & Oxford).	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4855	N/A	Members of the Public	*Policy T27 overlooks the recent decline of informal community health infrastructure in Medway such as pubs, sports facilities, and independent cafés which are vital for community cohesion and wellbeing. *IDP lacks a clear budget or policy mechanism (e.g. Section 106 contributions) to ensure delivery of health-related infrastructure under T27. *There is no SoCG between Medway Council and health bodies. *Although Policy T27 acknowledges health challenges like obesity and social isolation, other parts of the Plan contradict this by failing to protect the community assets that help address these issues. *While some short-term funding is mentioned for "isolation centres," these are not embedded in the Local Plan and lack long-term financial security. They do not replace the organic social spaces that have been lost.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Low-quality convenience food outlet (LQCFO): Class E retail premises where the primary offer is pre-packaged "HFSS" foods/drinks with <15% of net sales area devoted to fresh fruit/veg or staple healthy items (milk, wholegrains, pulses). Cluster: Three or more takeaways, late-night uses, or LQCFOs within a 100 m radius measured along the pedestrian network. Modification Sought (paste-ready) Amend Policy T27 to: require early engagement with NHS Kent & Medway ICB and secure proportionate health contributions; define and protect Community Health & Circular Economy Venues with adaptive-reuse priority and access to exceptional-circumstances CIL relief; mandate proportionate HIA/EqIA in areas of highest deprivation and exclude new takeaways within 400 m of schools; embed a retrofit-first approach with PAS-compliant quality controls and a heritage-skills pipeline; add procurement safeguards to prevent rogue operators; and introduce a Heritage & Retrofit Fiscal Equality clause to	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4856	N/A	Members of the Public	Proposes VAT relief for repair, retrofit, and heritage works to correct bias toward new-build. Suggests expanding zero-rate for energy-saving materials beyond 31 March 2027 and broaden refund mechanisms for community retrofit schemes. Allow parity for whole-house fabric-first retrofits, especially in deprived areas.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Paragraph 10.2.9	Introduce VAT relief (zero) for repair, maintenance, retrofit and heritage works, including lime, timber and stone conservation, to correct the current bias favouring new-build. Contributes to cohesion, reduced isolation. Embed heritage trades to strategy and define kips. Extend/expand the zero-rate for energy-saving materials beyond 31 March 2027, and allow parity for whole-house fabric-first retrofits, especially in deprived areas. Broaden refund mechanisms (akin to DIY new-build refunds) to qualifying community retrofit and heritage-skills	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4857	N/A	Members of the Public	Health Impact Assessment Toolkit and a Hot Food Takeaway Guidance Note (2025) are guidance documents, not binding policy caps within the retail chapter, so they don't by themselves implement T27's "control" pledge.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Paragraph 10.2.12	Joint-working evidence is incomplete. The Reg-19 report refers to a composite Statement of Common Ground and names SoCG with KCC and Thurrock, but does not explicitly show a published SoCG with NHS Kent & Medway ICB, despite T27's reliance on health infrastructure delivery. Withdraw plan	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4858	N/A	Members of the Public	The Council's claim of a "phased approach" rests on an IDP that is still being updated after Regulation 19. That means the plan is asking the Inspector to accept strategic growth without a fixed, costed, funded and timed infrastructure schedule. Raises risks under CIL Regulation 122.	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery	Paragraph 10.5.12	Transparency and realism. A clear contributions methodology (thresholds, calculators, heads of terms) that won't undermine viability. A phasing & triggers schedule for each strategic site (what/when/by whom/cost/funding source). Transparency safeguards: personal or political gain of decision makers	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4859	N/A	Members of the Public	Claims digital infrastructure policy is based on incorrect baseline (e.g. 8% gigabit coverage vs. actual 92%). Notes lack of binding delivery mechanisms and drafting error ("download speeds of connections offering download speeds") that weaken clarity.	10. Health, Communities and Infrastructure	10.6 Digital communications	Paragraph 10.6.4	Update the baseline with current Ofcom/BDUK data	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4860	N/A	Members of the Public	Vague and unenforceable policy language (e.g. "appropriate", "reasonable walking distance"). Warns of legal risks under CIL and PSED due to lack of measurable standards and protections for vulnerable groups.	10. Health, Communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	Development resulting in the loss (in whole or part) of a community or cultural facility will be refused unless one of the following applies: a) A minimum 12-month continuous marketing period at a realistic price/lease (independent valuation) with active promotion has failed, and an open-book viability review confirms non-viability; and no realistic community/VCSE takeover exists; or b) Replacement provision of equivalent or better quality and quantity, serving the same catchment, is secured and available for use before the loss (or via a Grampian condition with agreed transitional arrangements); or c) The proposal provides alternative community use whose benefits clearly outweigh the loss for the same user groups. D. Safeguards and process D1. Planning applications involving loss must submit: marketing dossier; open-book appraisal; catchment/user analysis; EqIA; replacement heads of terms. D2. Assets of Community Value (ACV) status and active community bids will be a material consideration. D3. Change-of-use risks to critical facilities may be addressed via targeted Article 4 Directions (separate process). E. Healthcare estate E1. Loss or relocation of NHS facilities will only be supported where formally declared surplus within a	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4861	N/A	Members of the Public	S24 is unsound and poses legal risk. *Deferral/lack of clarity: It anchors obligations to the “latest IDP/guide/assessments” without embedding fixed triggers, costs, or timing in the Plan. *CIL Reg. 122 exposure: Blanket expectations that are not tied to necessary, directly related, and fairly/scaled tests or a published calculator/thresholds; obligations risk being struck out on appeal. *Viability contrary to PPG *Transparency failure: The promise that “sensitive information... will remain confidential from the public” conflicts with viability transparency expectations *Phasing weakened by viability override: The sequence “onsite ahead of occupation... unless viability shows otherwise” turns infrastructure-first into a negotiable	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery	Embed site-specific phasing/triggers, publish a tested contributions methodology, align viability with PPG (EUV+), remove blanket confidentiality, and secure SoCGs with providers to evidence deliverability.	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4862	N/A	Members of the Public	Says waste policy is too generic, lacking measurable targets, spatial strategy, and operational standards. Evidence gap and no DM criteria. Criticises absence of construction waste management and risks under CIL Regulation 122.	12. Waste Management	12.2 Future management of waste in Medway	Vision for Waste Management	Embed repair-first/heritage-materials and salvage obligations in policy; secure skills via s106 where necessary; place VAT relief as an implementation/advocacy measure, not a condition of consent. Repair-first: Windows/doors to be repaired over replaced; where replacement is unavoidable, use heritage-compatible materials (timber, metal to original profiles). uPVC permitted only where a whole-life carbon & significance assessment shows no reasonable heritage/material alternative. Salvage & reuse: Pre-demolition salvage plans (timber, stone, slate); require materials passports and on-site reuse where feasible. Schemes using heritage materials receive positive planning weight; adopt procurement preference for heritage materials. National ask (tax): Council will lobby HMT/HMRC for VAT parity/relief on repair/retrofit and heritage works to disincentivise low-longevity uPVC and support circular, fabric-first restoration. Adopt measurable 2030/35 targets (residual kg/capita, recycling %, landfill %). Publish arisings forecasts and a capacity gap analysis. Set a spatial strategy: safeguard existing waste sites/wharves; allocate industrial land for enclosed facilities; define buffers and HGV routing. Add clear DM criteria (odour/noise/dust standards, enclosure). Require Circular Economy Statements for majors: pre-	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4863	N/A	Members of the Public	Claims Chapter 10 fails to demonstrate a justified and deliverable spatial strategy. The housing allocations lack robust evidence of infrastructure capacity, notes over-reliance on strategic sites, insufficient environmental mitigation, and misalignment with national policy.	Regulation 19 Consultation		Paragraph 13-Chapter 10	Under the Health and Social Care Act 2012, local plans must consider health outcomes in decision-making. Social infrastructure is unplanned, unfunded, and unphased. The proposed policy is underpinned by an inconsistent and outdated evidence base. For example, reliance on Public Health England's 2017 guidance [143] does not reflect recent trends in public health, youth vaping, or food access. The Integrated Care Strategy [140] is strategic in scope and lacks ward-level specificity required for zoning-based retail exclusions. Moreover, the Local Plan Evidence Base [146] does not clearly support the use of an arbitrary 10% obesity threshold, nor does it justify exclusions on vape or convenience stores. This lack of robust, proportionate, and current evidence undermines justification and effectiveness, contrary to NPPF. Strengthen Evidence Base: Provide detailed, up-to-date evidence for housing and employment land supply, infrastructure capacity, and environmental constraints. Revise Spatial Strategy: Ensure it is realistic, phased, and focused on sustainable development principles, with a clear rationale for site selection. Claim: Exceptional circumstances justify release of Green Belt land west of Strood. Flaw: The justification is weakly argued and primarily based on Gravesham BC's adjacent land release. "Exceptional	No	To ensure the Plan is subject to rigorous scrutiny regarding its infrastructure delivery, spatial coherence, and inadequate safeguards for public health and environmental protection. The Plan also fails to embed active travel principles. Walking and cycling infrastructure is weak or absent, with no evidence of a cohesive network or behaviour change strategy. Furthermore, the Plan does not address women's safety in public space and transport, which is a serious omission from an equality

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4864	N/A	Members of the Public	Criticises Policy T27 for lacking binding delivery mechanisms and measurable health outcomes. Calls for protections and relief for venues contributing to community health and circular economy. There is no published Statement of Common Ground with NHS Kent & Medway ICB.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	T27 that adds binding delivery tools, measurable health metrics, protections for community/"circular economy" venues, heritage-skills pipelines, and 1) Soundness & legality Narrative, not enforceable: As drafted, T27 states intentions but lacks clear, unambiguous criteria or delivery/monitoring hooks, contrary to NPPF para 16(d) (policies should be "clearly written and unambiguous"). GOV.UK No SoCG with NHS ICB: For strategic health infrastructure, the plan should be underpinned by active joint-working evidenced through a Statement of Common Ground (NPPF para 28 and effectiveness test). Absence/inaction risks unsoundness on effectiveness/justification. Health infrastructure ask not embedded: NHS Kent & Medway ICB has a live Developer Contributions Guide with thresholds/methods for s106/CIL, but T27 doesn't secure this at decision stage. Who's a consultee?: ICBs are not statutory consultees on planning applications (they are consultees for local plans), so without explicit triggers in policy you won't reliably secure their input or contributions. UK Parliament Equality & health outcomes: No proportionate HIA/EqIA triggers or measurable outcome indicators—leaving	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4865	N/A	Members of the Public	Says education policy fails to target deprived areas or align with local workforce needs. Notes lack of demand analysis, delivery targets, and monitoring. Suggested Modifications: *Commission and publish updated, sector-specific skills demand assessments. *Incorporate measurable targets for apprenticeship starts, completion rates, and local job retention. *Explicitly link provision to social cohesion and anti-isolation strategies *Broaden sector focus to include vocational pathways in policing, nursing, and grassroots environmental/NGS	7. Economic Development	7.5 Learning and skills development	Policy T12: Learning and skills development	Commission and publish updated, sector-specific skills demand assessments, particularly for STEM, AI/digital, health, and public services. Incorporate measurable targets for apprenticeship starts, completion rates, and local job retention. Explicitly link provision to social cohesion and anti-isolation strategies, with a monitoring framework. Include lessons learned from past local skills projects, with delivery risk mitigation. Broaden sector focus to include vocational pathways in policing, nursing, and grassroots environmental/NGS training alongside STEM.	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4866	N/A	Members of the Public	Fails to address the acute skills and literacy deficit that is already damaging the area's economic competitiveness. Without targeted education infrastructure, Medway will remain unattractive to high-value businesses and will continue to lose investment.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.10	Deprivation is concentrated—so education/skills has to be front-loaded Medway has 14 neighbourhoods in the most deprived 10% in England, and 37 in the 20% most deprived (IMD2019). Growth without hardwired education and adult-skills investment will widen gaps. Current evidence shows that approximately 24% of adults in Medway lack essential literacy or numeracy skills (Learning & Work Institute, 2023), equating to around 42,900 residents unable to meet the basic functional requirements of many jobs. Early years and school-level literacy outcomes are also consistently below national and regional averages, with Year 1 phonics attainment at just 75.7% compared to over 80% nationally. This entrenched educational underperformance has contributed directly to business disengagement; in recent years, employers have chosen to locate or expand elsewhere, citing concerns over workforce readiness and the costs of remedial training. The result is a demonstrable loss of investment, jobs, and tax revenue to neighbouring authorities, deepening Medway's deprivation (now ranked 68th out of 151 local authorities, a deterioration of 20 places since 2015). Under the National Planning Policy Framework, Local Plans must be positively prepared, justified, and effective. By ignoring the existing and forecast skills gap, and by failing to set out a credible, funded strategy for literacy and workforce development, the Plan does not meet objectively assessed economic needs, is not evidence-led, and cannot deliver its stated growth ambitions.	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4867	N/A	Members of the Public	Highlights critical workforce shortages and lack of education infrastructure. Warns that without funded commitments, the Plan will perpetuate low skills and underinvestment.	7. Economic Development	7.2 Employment strategy	Paragraph 7.2.2	The Plan relies on a future, "iterative" IDP and S106 negotiations, with viability caveats, rather than fixing what must be delivered, when, and by whom. That pushes core infrastructure decisions beyond examination, which goes to deliverability ("effective"). See Policy S24 and 10.5 ("IDP... iterative... updated after Reg 19"; "no CIL adopted"; sequencing left to negotiation). Medway Council NPPF says strategic policies must make sufficient provision for education infrastructure (para 20) and plans should set out contributions expected (para 35). The current drafting doesn't do that with measurable precision	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4868	N/A	Members of the Public	The 2020 Use Classes Order is primary legislation in effect - Medway's Local Plan must operate within its framework. Permitted development rights are given by national regulations; a Local Plan cannot simply forbid something that national law expressly allows, unless it uses Article 4 Directions. So, if the Medway policy simply acknowledges Class E and doesn't attempt to override national rights without an Article 4, it is likely lawful. But lawfulness doesn't mean it's wise - it just means it complies with higher-order legislation. The plan is therefore unsound.	7. Economic Development	7.3 Existing employment provision	Paragraph 7.3.3	Risk to town centre vitality: Unchecked change could hollow out the retail core — especially if spaces shift toward high-margin but low-footfall uses (e.g., private offices, boutique gyms). Contradiction to stated policy aims: If the Local Plan's vision stresses stable, diverse, and community-serving centres, allowing unfettered Class E changes can directly conflict with that vision unless safeguards are in place 1. Material changes of use within Class E generally don't need planning permission — but external alterations (e.g., shopfront changes, flues, extensions) may still require it. 2. article 4 Directions: Councils can remove permitted development rights in specific areas, requiring permission again. Listed buildings & conservation areas: Extra restrictions still apply. Mixed-use complexities: If a site has mixed-use elements or sui generis elements, permission may still be needed. Other consents: Building regs, licensing, highways approvals, and environmental permits are unaffected by the Use Classes Order. Employment land protection	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4896	N/A	Members of the Public	New developments often replace quality housing with low-spec, high-density builds, many of which are taken over by private landlords acting as informal social housing providers, without oversight or standards. Empty Homes: No credible strategy exists for reusing Medway's hundreds of vacant homes or retrofitting substandard housing. Heritage & Materials: The Plan lacks support for preserving older homes or incentivising traditional materials, unlike subsidies for new builds.	2. Vision and Strategic Objectives	2.2 Strategic objectives	Objective 4: Boost pride in Medway	Introduce an Empty Homes First Policy to prioritise reuse over greenfield development. Support sensitive retrofitting, including tax incentives for traditional materials in conservation areas.	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4899	N/A	Members of the Public	The Local Housing Needs Assessment (LHNA) and overall housing delivery are considered unsound. Current policies incentivise poor-quality builds and unnecessary development, reducing the quality and diversity of housing stock. Medway Council has legal mechanisms to ensure housing is only occupied after infrastructure is delivered, including: *Phasing policies embedded in the Local Plan (Regulation 19). *Section 106 obligations and planning conditions with timing triggers. *Alignment with the Infrastructure Delivery Plan. *Use of CIL or strategic contributions collected before occupation.	6. Housing	6.2 Housing mix	Paragraph 6.2.1	NPPF para. 73 and 122 (2023 version) state that plans should ensure that infrastructure is provided in step with growth. Lack of phasing or occupancy triggers risks unsustainable development, which can render a plan unsound at examination.	No	

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Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4903	N/A	Members of the Public	*Lack of safe walking/cycling routes increases traffic accidents. *Absence of nearby primary care delays immunisations and early health support. *No open/play spaces contributes to obesity and poor mental health. *Children must travel long distances to school, increasing absenteeism and burden on families. Fragmented development delays peer interaction and socialisation. *'Early' residents face isolation in service-poor "dormitory estates." *Weak public realm and lack of local hubs foster anti-social behaviour and poor local identity. *Long-term stigma can attach to developments launched without functioning communities. *Nearby urban areas are stretched by lack of local GP, nursery, and school provision. *Emergency and social services face increased demand and slower response times.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites	Residential or mixed-use development shall not be first occupied until: (a) Safe pedestrian, cycle, and vehicular routes to existing or new schools and health facilities are operational; (b) On-site play areas and open space are provided in accordance with approved phasing; (c) Adequate primary and early years provision is secured and operational; (d) A health impact assessment confirms no net harm to child health and community cohesion." 6. Supporting Evidence to Cite Innovation Park Medway (IPM) ? early isolation and economic under? Performance. North Stoke Phase?1 Evaluation (2022) ? poor early cohesion and child outcomes where infrastructure lagged. Medway Council Health & Wellbeing Strategy ? highlights childhood obesity and ASB risks in service-poor areas. NPPF paras.78, 92–95, 104 ? require safe, healthy, and inclusive communities, directly breached by OOS development	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4911	N/A	Members of the Public	If the Medway Local Plan promotes AI as a "key growth sector" but fails to assess AI-related risks - then it may not meet its legal duty.	7. Economic Development	7.5 Learning and skills development	Paragraph 7.5.4	The draft Medway Local Plan promotes Artificial Intelligence (AI) as a "key growth sector" and/or thematic focus for planning policy. However, it fails to assess or address the equality impacts of AI, particularly in relation to the protected characteristic of sex. This omission breaches the Public Sector Equality Duty (PSED) in section 149 of the Equality Act 2010 and renders the plan unsound under the tests of legal compliance and soundness in the National Planning Policy Framework (NPPF). These risks are well-evidenced in academic literature, government reports, and Equality and Human Rights Commission (EHRC) guidance. They fall squarely within the PSED remit. 4. Failures in the Current Draft Plan No Equality Impact Assessment (EqIA) or equivalent analysis has been presented that specifically addresses AI-related impacts. The Plan does not demonstrate due regard to sex-based impacts, nor does it show consideration of mitigating measures. The omission means the authority has not met its continuing statutory duty under s 149	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	4918	N/A	Members of the Public	The Plan is not ready or fit for me Regulation 19 consultation - some essential documents are incomplete or missing. The evidence base is not proportionate or robust enough to justify the health elements of the Local Plan under Reg 19 soundness tests. Does not address GP shortage at local or national level. Aspirational but unsound.	10. Health, Communities and Infrastructure	10.1 Introduction	Paragraph 10.1.2	Mandate early, engagement with Public Health as a validation requirement. Require HIAs to follow IEMA guidance and the Medway quality review template. Define "competent expert" with qualifications and experience criteria. Monitoring & Accountability Set measurable KPIs (e.g., GP accessibility, patient travel times, facility capacity). Require post-occupation health impact reviews at Yes, 3, and 5 years. Capture cumulative impacts of sub-threshold schemes via mandatory screening and annual area-based reviews. Hardwire delivery: link HIA outcomes to SYes06/CIL, IDP	Yes	Medway resident
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	5024	N/A	Members of the Public	A2/A228/A289 corridors congested; Strood/Hoo lack evening PT and GP capacity. No costed Infrastructure Delivery Plan. Highways Act 1980, S.278 allows councils to require highway works before occupation. CIL Regulations 2010 requires clear funding and phasing of infrastructure supporting growth.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.1	NPPF (2023, paras.773, 104, 122, 130) Plans must be deliverable, infrastructure-led, and support sustainable development	No	
Online	1601	Online (OPUS)	Mrs Gillian Mulloy [1601]	5030	N/A	Members of the Public	Medway has placed £33million into the Innovation centre already. Crime rates, poor (literacy or numeracy) skills (in Medway) does lot lend itself as viable business opportunities. Unsound.	7. Economic Development	7.2 Employment strategy	Paragraph 7.2.7	For employers, that translates into higher training costs, lower productivity, and increased recruitment difficulties. When other areas can offer a better-skilled workforce from day one, businesses have little incentive to choose Medway unless they see a credible plan to fix the skills gap.	No	

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Online	1542	Online (OPUS)	Mrs Hazel Sellwood [1542]	4447	N/A	Members of the Public	Concern raised regarding over population, decreasing air quality and infrastructure: not enough school places, doctors or infrastructure to cope.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.1	* Firstly road infrastructure.....one road in, one road out. The bypass is gridlocked. * Local transport is not enough so people are using cars and air quality is diminishing rapidly. * Sewage/flood issues need dealing with.	Yes	It affects everyone not just people sitting on the council who knows nothing about the local environment or what it's like living in the area
Online	1542	Online (OPUS)	Mrs Hazel Sellwood [1542]	4448	N/A	Members of the Public	Concern over village development and loss of village atmosphere.	14. Site Allocations	14.10 High Halstow	Paragraph 14.10.3	The housing should be for local villagers to move within the village...bungalows to downsize to, small affordable homes for the youth in the village to be able to continue living in the village. New pumping station for existing and new build property.	Yes	To ensure that local voices are heard.
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4808	N/A	Members of the Public	Medway Green Belt boundaries have been changed without clear indication or consultation against National Planning policy	4. Natural Environment	4.1 Introduction	Paragraph 4.1.1	As the land is currently used as farming land it should therefore not be changed to grey belt	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4810	N/A	Members of the Public	Strood West Parcel 1-4 does not have the infrastructure to cope with such a large development. The pipeline that runs north of Rede Court Road and beyond should not be built upon.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.5	The land needs to remain as green belt as surely agricultural land should be maintained to help the environment! Also, the infrastructure in place is not consistent with the number of homes/people occupying the area	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4814	N/A	Members of the Public	*Failure to adopt brownfield sites first. *Erosion of green belt. *Inadequate infrastructure *Poor air quality	14. Site Allocations	14.7 Strood West	Paragraph 14.7.1	Medway Green Belt boundaries have been changed without clear indication or consultation against National Planning policy Full text: Medway Green Belt boundaries have been changed without clear indication or consultation against National Planning policy	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4816	N/A	Members of the Public	Infrastructure intended to be put in place is not nearly enough to cope with traffic etc.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.2	Better road plans	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4818	N/A	Members of the Public	Green belt agricultural land.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.3	Green belt agricultural land should not be built on.	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4820	N/A	Members of the Public	Gravesham Council do not close their consultation until after Medway has closed theirs.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.5	N/ A	No	
Online	1621	Online (OPUS)	Mrs Hazel Wiggins [1621]	4822	N/A	Members of the Public	Inadequate infrastructure to be able to cope with so many new homes, air pollution.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Do not build houses on this green belt land	No	
Online	1627	Online (OPUS)	Mrs Helen Holden [1627]	4824	N/A	Members of the Public	Is it truly necessary to use Greenbelt land? ensure that all other avenues of possibility are explored before we just give up and lose our protected land to housing. Decisions should be made for good long-term outcomes and not just short-term problem solving.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 19-21	1. I would like to see evidence that using Greenbelt was necessary. Re-classifying to "Grey Belt" all seems rather convenient! And then further... 2. I would like to see evidence of how travelling in to Strood for all these extra cars is going to work given the congestion that we see today, let alone with at least 8k more cars on the road! 3. I would like to see evidence that these new homes are going to even be for local people... there is much speculation that these will be sold to London councils!! Ultimately you are absolutely ruining this area - it's already too congested, the infrastructure is already strained and it	No	
Online	1591	Online (OPUS)	Mrs Helen Lucas [1591]	4564	N/A	Members of the Public	Querying warning to general public about plans to use grey belt land for development.	14. Site Allocations	14.7 Strood West	Paragraph 14.7.1	The land now termed as Grey belt is a stretch too far from the government outlines.	No	
Online	1591	Online (OPUS)	Mrs Helen Lucas [1591]	4567	N/A	Members of the Public	Querying release of greenbelt land and warning to general public of intensions.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt	Why have other area such as parcels 12-13 near Halling not prioritised? This suggests clear intent and unfairness	No	
Online	1591	Online (OPUS)	Mrs Helen Lucas [1591]	4569	N/A	Members of the Public	Concern over infrastructure, roads school and healthcare capacity. Object to the release of green belt.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	The land west of Strood should not be included in the plan	No	
Online	1539	Online (OPUS)	Mrs Jayne Dunn [1539]	4435	N/A	Members of the Public	Proposal is rejected. The proposed housing is excessive and there is concern over how we can guarantee that the new houses will be for local residents (Otterham Quay Lane as an example). Pressure on local infrastructure hasn't been addressed. Concern that Medway Hospital is already stretched. Concern about congestion on the roads.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	Drastically reduce the number of houses being built, especially in the less urban areas such as Pump Lane and Capstone. Do not allow London boroughs to buy any more housing stock in Medway. Regenerate the run-down areas of Gillingham and Chatham.	No	
Online	1473	Online (OPUS)	Mrs Jennifer Price [1473]	4330	N/A	Members of the Public	Concern over development of greenbelt land	14. Site Allocations	14.7 Strood West	Figure 12: Land West of Strood Concept Plan	Scrape it !	No	
Online	567	Online (OPUS)	Mrs Jill Peet [567]	4997	N/A	Members of the public	Support	Regulation 19 Consultation		Paragraph 10 - Chapter 7			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	4998	N/A	Members of the public	Support for Local Plan process and growth for future generations	Regulation 19 Consultation		Paragraph 17 - Chapter 14			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	4999	N/A	Members of the public	Support Chapter	Regulation 19 Consultation		Paragraph 12 - Chapter 9			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	5000	N/A	Members of the public	Support Chapter	Regulation 19 Consultation		Paragraph 11- Chapter 8			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	5001	N/A	Members of the public	Support Chapter	Regulation 19 Consultation		Paragraph 9 - Chapter 6			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	5002	N/A	Members of the public	Support Chapter	Regulation 19 Consultation		Paragraph 8 - Chapter 5			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	5003	N/A	Members of the public	Support Chapter	Regulation 19 Consultation		Paragraph 16 - Chapter 13			
Online	567	Online (OPUS)	Mrs Jill Peet [567]	5005	N/A	Members of the public	Support Local Plan	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 19			

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Online	1298	Online (OPUS)	Mrs Karen Shaw [1298]	4790	N/A	Members of the Public	Opposes housing expansion in Hoo Peninsula and High Halstow due to infrastructure, flooding, and emergency service concerns.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Paragraph 14.9.2			
Online	1298	Online (OPUS)	Mrs Karen Shaw [1298]	4791	N/A	Members of the Public	Key concerns include the excessive scale of the plans and the area's inadequate infrastructure. Expanding residential areas without addressing these issues could seriously impact the quality of life and safety of current and future residents.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Find somewhere else to build the houses, but still address the area's inadequate infrastructure with better transport links, medical facilities, drainage, shortage of school places, limited parking in Rochester and Strood for commuters, overwhelmed emergency services etc.	Yes	Like to be fully informed
Online	1540	Online (OPUS)	Mrs Lorraine McNaught [1540]	4446	N/A	Members of the Public	A number of concerns regarding infrastructure, mainly: increase in traffic, lack of schools and strain on healthcare. Also feels residents are not having a say in these plans.	Regulation 19 Consultation		Paragraph 1	I think we need to know more about schools and Doctors/Hospitals.	No	
Online	1477	Online (OPUS)	Mrs Lynette Bell [1477]	4341	N/A	Members of the Public	Hopes the Council takes account of all objects	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 21		no	
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4420	N/A	Members of the Public	Querying reference to students and whether provision can be made for SEN.	1. Overview	1.2 Medway area	Paragraph 1.2.1			
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4421	N/A	Members of the Public	Supports aspiration but querying planning permission justification, political influence and changing of positions.	1. Overview	1.2 Medway area	Paragraph 1.2.11			
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4422	N/A	Members of the Public	Support for aspirations but querying infrastructure provision and environmental impact.	1. Overview	1.2 Medway area	Paragraph 1.2.2			
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4423	N/A	Members of the Public	Claims Local Plan is not compliant due to lack of transparency, due to changes without justification. Querying feasibility and funding in relation to service provision.	2. Vision and Strategic Objectives	2.1 Vision	Paragraph 2.1.1	See above	No	
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4425	N/A	Members of the Public	Querying compliance over greenbelt, lack of justification and no consultation with residents on this matter/change.	Regulation 19 Consultation		Paragraph 1	The policy needs to be fully compliant. Greenbelt protection is not upheld Grey belt terminology is unjustified and unsubstantiated as a planning category	No	
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4426	N/A	Members of the Public	Querying compliance over greenbelt and lack of justifications for its use and lack of robust evidence.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.2	See above	No	
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4427	N/A	Members of the Public	Querying changes made to plan without transparency and justification.	Regulation 19 Consultation		Paragraph 1	It must set out how the plan meets the needs of current residents without negatively impacting them in terms of current Infrastructure, transport, pollution, road works and services	No	
Online	1531	Online (OPUS)	Mrs Lynne Barnes [1531]	4428	N/A	Members of the Public	Support for more services but queries how achievable delivery of services.	1. Overview	1.1 Introduction	Paragraph 1.1.1	Ambitions need to be realistic, achievable and not come at the cost of one service to improve another's	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	4989	N/A	Members of the Public	Concern over loss of agricultural land and querying urban/suburban housing figures.	Regulation 19 Consultation		Paragraph 1	Remove the developments proposed for Capstone and Rainham and spread this over the existing brownfield and slum areas across Chatham, Gillingham and Rochester. The latter needs to be redeveloped badly as much of the existing housing is not fit for habitation	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	4994	N/A	Members of the Public	Against allocation of Capstone. Concern over negative impacts.	Regulation 19 Consultation		Paragraph 2	The Capstone Valley should be removed from the plan and the agricultural land retained to protect our farming industry. I am well aware that one particular farming landowner is behind the promotion of developing this land and has been buying up smaller areas of land in the area to reduce any objection to development. This owner has been pushing for this since 2014 so this just shows that money and perseverance can overcome the will of the majority.	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	4995	N/A	Members of the Public	Querying effectiveness of Local Plan consultation.	Regulation 19 Consultation		Paragraph 3	I cannot see that there has been any strategic working across borders since there seems to be much replication of matters such as school and shop provision. The whole way in which this consultation has been conducted, including this representation form, does not make it easy for the general public to make representation. The language used in the documents that need to be read in order to make a representation are not user friendly and I believe this to be a deliberate ploy to deter comments.	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	4996	N/A	Members of the Public	Querying effectiveness of Local Plan process	Regulation 19 Consultation		Paragraph 4	My opinion hasn't changed from when this question was posed in the last section. I would like to see the Capstone Valley proposal removed from the plan to preserve the agricultural land in this area and to protect the strategic gap between Medway and Maidstone	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	5004	N/A	Members of the Public	Querying effectiveness of Local Plan consultation	Regulation 19 Consultation		Paragraph 5	Remove the Capstone Valley development from the plan to preserve agricultural land and our farming industry.	No	
Online	1143	Online (OPUS)	Mrs Maureen Wade [1143]	5011	N/A	Members of the Public	I don't agree with the council summarising what they think are the main issues for the inspector. All comments should be available and read by the inspector.	Regulation 19 Consultation	Making comments on the Regulation 19 Pre-Submission Draft Local Plan	Paragraph 20	For this section what changes I think are needed is not appropriate. This is the reason this is seen as a tick box process.	No	
Online	1613	Online (OPUS)	Mrs Pamela Donoghue-Freeburn [1613]	5008	N/A	Members of the Public	Concern over development and impact on infrastructure, negative impacts.	9. Transport	9.1 Vision for Access and movement in Medway		More thought and evidence based thinking needs to be provided with regards the increased urbanisation of Medway. Clear and specific ideas need to be provided for what will happen when additional cars DO make it on to our roads. How will Medway maintain the roads when they are already full of potholes? How will the transport system cope with the increased demands for those working remotely to return to the office (including requests/orders from the civil service and KCC residents)	No	
Online	1613	Online (OPUS)	Mrs Pamela Donoghue-Freeburn [1613]	5010	N/A	Members of the Public	The land is or should be designated as greenbelt land, I believe that this land should not be considered before other green belt, brown belt land or other land.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4	The plan should be changed to place brown belt and grey belt land first.	No	

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Online	1551	Online (OPUS)	Mrs Patricia King [1551]	4455	N/A	Members of the Public	Developing prime farmland for housing is unjustified. Infrastructure—roads, transport, and healthcare remains inadequate. Conditions have worsened since 2021's rejection, with no improvements. Existing issues must be resolved first, especially expanding Medway Hospital to support current population demands.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.5	Do not include this site in the plan. This agricultural area is too important to lose. Existing infrastructure needs vast improvement before any changes to use of land should be considered. Improve the Road network to improve congestion Improve accessibility to public transport (regular and frequent bus services to Rainham, Gillingham stations for a start). Build a new hospital or expand the existing one. Find more GPs to fill the empty spaces in existing health	No	
Online	1551	Online (OPUS)	Mrs Patricia King [1551]	4456	N/A	Members of the Public	Concern about developers lack of understanding of the area and exiting problems. The developer's presentation lacked depth and local awareness. Key details like number of developers, housing plans, and timelines were unclear. Transport planning was poorly considered, especially near schools and care facilities, with an unrealistic assumption of pedestrian-dominant site use.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.6	Throw the plans by this developer out. It is all hypothetical with nothing defined. No understanding of existing infrastructure problems was shown so no thought has been given on how to find solutions. They appeared to be offering their services as middle men, passing down responsibility as to what was built to the individual building lot owners and with little or no control of the overall build. This is not a good area to build houses on this scale. The Country needs to keep existing agricultural land, not turn it over to housing.. Do not build here.	No	
Online	1551	Online (OPUS)	Mrs Patricia King [1551]	4457	N/A	Members of the Public	Fragmented housing by many developers will cause major disruption.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.7	Do not build here.	No	
Online	1551	Online (OPUS)	Mrs Patricia King [1551]	4458	N/A	Members of the Public	Plans remain unchanged since 2021 rejection; issues persist, site unsuitable for housing, and land should stay agricultural for preservation.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Take this area out of the plan for housing development. Leave it as agricultural land to continue to help feed the population. Address the many infrastructure problems that exist in this area before you do anything else	No	
Online	1629	Online (OPUS)	Mrs Paula Potter [1629]	4826	N/A	Members of the Public	Disagrees that development will increase employment.	1. Overview	1.1 Introduction	Paragraph 1.1.1	A new housing estate is not going to bring anything work wise to the area.	No	
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4869	N/A	Members of the public	HMO's tend to attract individuals that have no social etiquette or desire to mix with the neighbourhood and have no regard or respect for the property and those that live around it	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.11			
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4870	N/A	Members of the public	All HMO's need licensing and annual reviews with local neighbourhoods.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.6			
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4871	N/A	Members of the public	They are not good opportunities and in my experience all HMO housing tend to be run by poor landlords/companies that exploit vulnerable groups and do not suitably vet tenants or involve views of neighbours.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.1	Open transparency and full consultation with neighbours via a meeting with specific information on types of tenants being targeted and how these are vetted and observed	Yes	All neighbours need to be involved to ascertain and ensure how safe the HMO will be
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4872	N/A	Members of the public	All HMOs need a full planning review initially and at least annually thereafter.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.9	All homes need planning applications	Yes	All neighbours need to be involved to be assured of the safety of their families
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4873	N/A	Members of the public	All neighbours need to be involved to be assured of the safety of their families plus the tenants need to be treated with respect and the properties looked after by both tenants and landlords	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.4			
Online	1634	Online (OPUS)	Mrs Pauline Barritt [1634]	4874	N/A	Members of the public	All HMOs I have either been near to or experienced have no suitable tenant checks or guidelines drawn up by landlords. There should be an additional independent body to review and take account of neighbours views on conduct of property and tenants at least annually	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.3			
Online	1607	Online (OPUS)	Mrs Ruth Dyke [1607]	4673	N/A	Members of the Public	Concern developing at Rainham on fruit growing land and removal of trees is contrary to Policy S1	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change		No	
Online	1607	Online (OPUS)	Mrs Ruth Dyke [1607]	4674	N/A	Members of the Public	Important to have decent rental housing at affordable rents.	6. Housing	6.2 Housing mix	Paragraph 6.2.3		No	
Online	1607	Online (OPUS)	Mrs Ruth Dyke [1607]	4675	N/A	Members of the Public	Concerned development at Rainham will result in removal of many trees impacting character of the area, air quality, light pollution, noise, increase run off and climate change.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.5	This development should be removed from the plan.	No	
Online	1607	Online (OPUS)	Mrs Ruth Dyke [1607]	4676	N/A	Members of the Public	Concern over traffic levels at Lower Rainham Road and impact on enjoyment to the Riverside Country Park.	14. Site Allocations	14.11 Lower Rainham	Paragraph 14.11.6	The development of Rainham Parkside should be removed from the plan.	No	
Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4677	N/A	Members of the Public	The area that the development is being considered on is currently green belt land. There is very little green belt land in our immediate vicinity and this area is used extensively for people walking and generally enjoying the countryside. It also acts as a barrier from the noise of the local traffic on the bypass	Regulation 19 Consultation		Paragraph 7 - Chapter 4	No green belt land should be built on.	No	
Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4678	N/A	Members of the Public	Further addition of this many houses will make existing traffic issues worse, pollution worse as well as the mental health issues associated with the stress of trying to travel.	Regulation 19 Consultation		Paragraph 12 - Chapter 9	Additional road infrastructure will be required to reduce traffic, this in turn will then use up more green belt land, worsening pollution.	No	
Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4679	N/A	Members of the public	This level of housing will make getting an appointment with a GP completely impossible. This is already a substantial issue. Exactly the same problem with dentists.	Regulation 19 Consultation		Paragraph 13- Chapter 10	Reduce the number of houses being built. Increase GP surgeries and GP appointment availability, increase dental surgeries and dental appointment availability	No	
Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4680	N/A	Members of the public	Do not understand how the policy supports the transition to net zero carbon by 2050 with such a large amount of additional cars on the road resulting from huge development of houses	Regulation 19 Consultation		Paragraph 16 - Chapter 13	reduce the number of new houses.	No	
Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4681	N/A	Members of the public	Concerns about pollution, loss of greenspace, and inadequate health infrastructure; fears mental health impacts from large-scale construction.	1. Overview	1.2 Medway area	Paragraph 1.2.2	Reduce the number of houses on the new development, increase infrastructure, provide more environmentally friendly ways of transport. protect current greenspaces.	No	

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Online	1609	Online (OPUS)	Mrs Samantha Clarke [1609]	4682	N/A	Members of the public	Supports housing need but opposes use of Greenbelt land, suggesting alternative disused sites should be considered.	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3	Stop the use of greenbelt land in housing developments.	No	
Online	1646	Online (OPUS)	Mrs Sarah Harrington [1646]	4921	N/A	Members of the Public	Object to the re-designation of SNF1–SNF3 from Greenbelt to 'Grey belt' with reasons given including function of Green Belt being fulfilled. Also co-operation with Gravesham does not justify boundary revision. These grounds render the re-designation legally unsound.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	The re-designation of SNF1–SNF4 from Greenbelt to "grey belt" should be removed from the plan, retaining their current Greenbelt status. Strood is already at or near maximum capacity in terms of infrastructure, traffic, and services, and further development would place unsustainable strain on the area. In accordance with the NPPF's brownfield-first approach, all other suitable non-Greenbelt and previously developed sites should be fully explored and exhausted before any consideration is given to altering Greenbelt boundaries. There are still plenty of sites in Strood that are classified as brownfield if	No	
Online	1519	Online (OPUS)	Mrs Sarah Malone [1519]	4390	N/A	Members of the Public	Concern over level of growth proposed on Hoo Peninsula and over population of villages. Support for protection for example Deangate Golf Course.	1. Overview	1.1 Introduction	Paragraph 1.1.1	Stop over developing the Hoo Peninsula	No	
Online	1519	Online (OPUS)	Mrs Sarah Malone [1519]	4391	N/A	Members of the Public	Concern over impact on air quality, Four Elms (roundabout) increased traffic pollution.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden		Stop over populating the Hoo Peninsula	No	
Online	1520	Online (OPUS)	Mrs Sharon Sewell [1520]	4392	N/A	Members of the Public	Concern over development in High Halstow - impact on infrastructure - waste water, waste, public transport, roads, health facilities.	14. Site Allocations	14.10 High Halstow		Reducing the number of newbuilds. Improving road layout. Increase GP surgeries, schools and dentists.	No	
Online	110	Online (OPUS)	Mrs Stella Tiller [110]	4332	N/A	Members of the Public	Capstone Valley undervalued; prioritize reuse of empty homes over greenfield.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.5	1. The Capstone Valley should have been protected at all costs. Even more so with the Lidsing Garden development having been given the go ahead. The council has seriously underestimated the importance of the Capstone Valley (which isn't a huge space) in this plan. The Rochester, Chatham, Gillingham, Rainham side of the river is extremely densely populated already compared to other areas of Medway. This should have been considered far more than it has.	No	
Online	110	Online (OPUS)	Mrs Stella Tiller [110]	4333	N/A	Members of the Public	Disparity in urbanisation across Medway	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram	Whilst no-one really wants to see more building on the Hoo Peninsula, there is clearly an already unfair distribution of housing and development. There is also more room to build better capacity roads (roads like Ash Tree lane, Capstone Road and Luton Road cannot be improved to accommodate additional capacity from the development of Capstone), and unlike areas such as Capstone Valley and Gibraltar Farm, there is an existing railway that could be utilised.	No	
Online	1516	Online (OPUS)	Mrs Sylvia Hillery [1516]	4388	N/A	Members of the Public	Concern over proposed development at Lordswood and Hempstead and areas joining.	Regulation 19 Consultation		Paragraph 1	Refuse planning permission that will allow the "Green Lung" of Medway. Maidstone Borough and Medway County council are now adjoined	No	
Online	1490	Online (OPUS)	Mrs Tracy Charlesworth [1490]	4559	N/A	Members of the Public	No proof to support green belt land reclassification to grey belt. Redesign of boundaries west Strood - does not support urban sprawl. Poor transport links to West Strood. Poor infrastructure in Medway - hospital is over capacity already.	Regulation 19 Consultation		Paragraph 1	Green belt land should not be built on. Medway hospital needs updating or built from new in more accessible area. More G.P's and GDP's needed before development. Better bus services to the area before development.	Yes	As a medway resident I feel it is important to be part of the whole process.
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4592	N/A	Voluntary and Community Organisations	Support Policy S1 which is in line with NPPF para 136.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4593	N/A	Voluntary and Community Organisations	Generally supports policy S2, suggests a 20% BNG target where appropriate, for strategic and/or greenfield sites.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4595	N/A	Voluntary and Community Organisations	Supports policy S5and suggests more specific wording on required buffers for ancient woodland, in line with the Standing Advice from Natural England.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4598	N/A	Voluntary and Community Organisations	Support this policy T1, in particular the section on Landscape, trees and amenity. Suggests prioritising tree planning in areas of low tree cover. Suggests design guidance proposes green connectivity and in line with the Kent Tree Establishment Strategy and NPPF	5. Built Environment	5.2 High Quality Design	Policy T1: High Quality Design and Amenity		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4602	N/A	Voluntary and Community Organisations	Support Policy DM21 especially points a) requiring connection to nature and h) promoting biodiversity. Recommend standards for access to wild/natural greenspace and woodland, in line with Natural England's guidance and the Woodland Trust's Woodland Access Standard	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4604	N/A	Voluntary and Community Organisations	The buffers close to Ancient Woodland referred to in Policy SA7 6c should reflect the priorities in the Kent & Medway LNRS and be free of any hard standing or built elements, and of any non-native planting or invasive species.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	
Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4606	N/A	Voluntary and Community Organisations	Policy SA11, concern raised about site allocation SR14 Land south of View Road, Cliffe Woods. The site is adjacent to Great Chattenden Wood an area of Ancient Woodland.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	In order to comply with NPPF para 193 c) requiring protection of ancient woodland, we ask that a buffer be applied to the ASNW adjacent to the eastern boundary on the policies map and/or a specific site requirement be applied requiring a survey and resulting buffer	No	

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Online	159	Online (OPUS)	Ms Bridget Fox (Woodland Trust) [159]	4607	N/A	Voluntary and Community Organisations	Broadly supportive of plans for increased green infrastructure and new areas of woodland to buffer and reconnect SSSI and ancient woodland sites. Concerned about two of the proposed site allocations: * HHH12 Land south of Main Road, Hoo St Werburgh and HHH26 Land north of Christmas Lane, east of High Halstow as close to Cockham Wood and Fishers Wood, respectively, both Ancient woodlands.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	HHH12 Any development adjacent to the wood should be set back by a buffer to protect from taking into account site specific survey and ecological recommendations. It is recommended that site specific requirements and the Hoo St Werburgh and Chattenden Concept Plan clearly identify the ancient woodland and SSSI to ensure the correct policies are applied. A strategic environmental management plan is required in para 19 of policy SA8 with reference to the Cockham Community Parkland which includes this wood. As well as reference to the SSSI, reference should be made to ASNW. HHH26 Detailed requirements are set out for a masterplan to be produced for HHH26 and HHH29, which also requires a green infrastructure strategy. Currently this requirement does not reference the ancient woodland. A woodland site survey, a survey for ancient & veteran trees, and a specification for a woodland buffer based on ecological advice, should all be required to comply with NPPF para	No	
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4527	N/A	Members of the Public	Support for First Homes - as 'secure tenure' opportunity	6. Housing	6.3 Affordable housing	Paragraph 6.3.3			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4528	N/A	Members of the Public	With the University of Kent winding down its programmes in Medway, student accommodation for those attending university in this area should decrease.	6. Housing	6.5 Student accommodation	Paragraph 6.5.3	Please see my comment above.	No	
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4529	N/A	Members of the Public	Concern about the impact of development of the Hoo Peninsula on agriculture and historic character. Supports the extension of a rail line to reduce road use	9. Transport	9.4 Grain Branch	Paragraph 9.4.3			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4530	N/A	Members of the Public	Concerns about parking on pavements and disruption to the transport hierarchy.	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4531	N/A	Members of the Public	Agree with prioritising healthy choices and wellbeing. Vaping and smoking/shisha should b discouraged. Concern that there are no plans for an additional hospital	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4532	N/A	Members of the Public	Support for development of Chatham Town Centre sites not currently used.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4533	N/A	Members of the Public	Support	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4534	N/A	Members of the Public	Concern about planning homes in Star Hill to Sun Pier area	14. Site Allocations	14.3 Heritage-led sites	Policy SA2: Heritage-led Sites			
Online	1571	Online (OPUS)	Ms Georgina Kosanovic [1571]	4535	N/A	Members of the Public	Concern over impact of development on wildlife and querying effectiveness of BNG.....	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Online	1649	Online (OPUS)	Ms Jamie Summers [1649]	4926	N/A	Members of the Public	Wish for the road infrastructure to be outlined in more detail, support the new housing development but need the evidence that the roads are going to be fit for purpose in the Hoo and Chattenden area	8. Retail and Town Centres	8.12 Hoo Peninsula	Paragraph 8.12.4		No	
Online	786	Online (OPUS)	Ms Julia Knight [786]	4940	N/A	Members of the Public	Support for a new hospital to support population growth.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Paragraph 10.2.1			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4956	N/A	Members of the Public	Supporting need for public transport infrastructure to support new employment space.	7. Economic Development	7.2 Employment strategy	Paragraph 7.2.2			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4957	N/A	Members of the Public	Need for public transport to support employment growth on the Hoo Peninsula.	7. Economic Development	7.2 Employment strategy	Paragraph 7.2.5			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4958	N/A	Members of the Public	Raising issue of need for further/higher education options outside of University option to raise skill levels.	7. Economic Development	7.5 Learning and skills development	Paragraph 7.5.1			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4959	N/A	Members of the Public	Support for education options specific to improving digital skills to open up career options.	7. Economic Development	7.5 Learning and skills development	Paragraph 7.5.3			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4960	N/A	Members of the Public	Raising issue of promoting better use of housing stock in terms of occupation.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Paragraph 6.4.23			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4961	N/A	Members of the Public	Raising issue of accommodation needs for further education students to open up opportunities.	6. Housing	6.5 Student Accommodation	Policy T5: Student Accommodation			
Online	1656	Online (OPUS)	Ms Karen Scott [1656]	4964	N/A	Members of the Public	Requesting annual review of housing need figure.	6. Housing	6.1 Introduction	Paragraph 6.1.2			

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Online	1639	Online (OPUS)	Ms Nikki Cagan [1639]	4917	N/A	Members of the Public	Car travel is essential and car users cannot be dismissed, making people use buses or walk is impractical.	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041	Definitely NOT to link St Marys Island with Gillingham etc! I pay a premium to live in an area that is nice and NOT in Chatham or Gillingham centre. Linking will devalue the reasons for living here and just turn SMI into another part of Gillingham/Chatham.....many residents will chose to live elsewhere. Frankly it is one of the few nicer parts of Medway and residents like the fact it is separate. Innovation centres popping up everywhere - pointless! 5 years on from COVID and many workers now being asked to return to offices so meeting spaces just not needed. More consideration to be given for car users (as above). Putting up flats everywhere does nothing to encourage a mix of residents - who wants to live in the middle of a bus station! Proposal to turn Medway City Estate into residential estate is ridiculous. Reading this plan, to be honest makes me want to sell up now and move out of Medway as there is nothing positive about it - just becoming less and less attractive unless first time buyer or low income. It will lead to wealthier families relocating and reduce diversity of economic backgrounds in the area. The fact that none of the information sessions were held at times working people could attend - all day time weekdays (commuters do not return in time to make the one session that ended at 7pm) is very telling.	No	
Online	1598	Online (OPUS)	Ms Tracy Stott [1598]	4588	N/A	Members of the Public	All of the presumed HMO rules need to be using article 4 rule.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.9	ALL of the presumed HMO rules need to be using the Article 4 rule.	No	
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4331	N/A	Members of the Public	Concern about obesity in Medway/junk food proliferation. Urgent need for investments in health (gyms/dietary education). Opposed to high density housing as this offers no privacy and little community.	1. Overview	1.2 Medway area	Paragraph 1.2.2			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4460	N/A	Members of the Public	Has already commented	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.1			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4461	N/A	Members of the Public	Agree, but not at the expense of established communities. Other comments to follow	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.1			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4462	N/A	Members of the Public	Need to be in right place and at a decent standard. Need to be Council regulated to stop abuse of neighbourhood and tenants.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.2			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4463	N/A	Members of the Public	Agreed	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.3			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4464	N/A	Members of the Public	More robust planning needed. Enforce Article 4; prioritise residents over profit-driven developers and council imbalance.	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.4			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4465	N/A	Members of the Public	Potential issue if HMO is in a relevant area. Must ensure there is good access to transport and amenities	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.5			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4466	N/A	Members of the Public	Licensing for large HMOs is essential; small HMOs should register. C3 to C4 changes bypass neighbours, enabling planning abuse and local disruption. Medway lacks oversight on HMO operations. Smaller HMOs should be made to register and state purpose.	6. Housing	6.8 Houses of multiple occupation	Paragraphs 6.8.6, 6.8.7			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4467	N/A	Members of the Public	More robust planning application. Need to regulate Article 4 to prevent developers not adhering to H7 . Inform and consult neighbours	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.8			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4468	N/A	Members of the Public	No comment	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.9			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4469	N/A	Members of the Public	No comment	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.10			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4470	N/A	Members of the Public	Ensure enforcement is in place	6. Housing	6.8 Houses of Multiple Occupation	Policy T8: Houses of Multiple Occupation			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4471	N/A	Members of the Public	Agreed	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.11			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4472	N/A	Members of the Public	Toughen licencing application and adhere to H7 stipulations. Regulate Article 4 use by developers and inform and consult neighbours	6. Housing	6.8 Houses of multiple occupation	Paragraph 6.8.13			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4978	N/A	Members of the Public	Opposed to development due to loss of open space, impact on wildlife and health. Supports better use of existing housing stock.	1. Overview	1.2 Medway area	Paragraph 1.2.2			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4980	N/A	Members of the Public	Querying what is meant by needs of diverse communities and how this affects types of infrastructure delivered.	1. Overview	1.2 Medway area	Paragraph 1.2.3	This comment makes no sense. Explain what you mean.	No	
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4983	N/A	Members of the Public	Querying level of consultation provided.	1. Overview	1.2 Medway area	Paragraph 1.2.4			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4984	N/A	Members of the Public	Querying Local Plan climate change ambitions	1. Overview	1.2 Medway area	Paragraph 1.2.5			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4985	N/A	Members of the Public	Referencing protection of national environmental designations.	1. Overview	1.2 Medway area	Paragraph 1.2.6			
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4987	N/A	Members of the Public	Concern over impact of development on existing infrastructure. Impact on air quality etc.	1. Overview	1.2 Medway area	Paragraph 1.2.7			

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Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4990	N/A	Members of the Public	Against new residential developmen and supports repurposing existing stock.	1. Overview	1.2 Medway area	Paragraph 1.2.8		No	
Online	517	Online (OPUS)	Ms Wendy Taylor [517]	4991	N/A	Members of the Public	Supports housing for local people.	1. Overview	1.2 Medway area	Paragraph 1.2.9			
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1632	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1633	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1634	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1635	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1636	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1637	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1638	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1639	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.34	File Q	N J Miller & C D Miller	SDLP 1640	N/A	Members of the Public	Concern over lack of infrastructure to build new homes in Allhallows (schools, healthcare facilities)	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hard copy	H.3	File N	N.B. Chapman	SDLP 1367	N/A	Members of the Public	Potentially could have identified more brownfield sites for development instead e.g. land near Strood Railway Station, Canal Road, the old Council offices, Coach and Horse pub.	3. Spatial Development Strategy					
Hard copy	H.3	File N	N.B. Chapman	SDLP 1368	N/A	Members of the Public	Developments at Strood combined with proposed developments between L. Rochester road and Higham Road, also at Dillywood Lane will have adverse impact on congestion and health infrastructure	3. Spatial Development Strategy					
Hard copy	H.3	File N	N.B. Chapman	SDLP 1369	N/A	Members of the Public	Queries reclassification of greenbelt that was in agricultural use.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4			
Hard copy	H.3	File N	N.B. Chapman	SDLP 1370	N/A	Members of the Public	Land in question is occupied by gas, oil and water pipeline, which limits area for building. Additional home building may cause pollution and reduce air quality.	4. Natural Environment					
Hard copy	H.3	File N	N.B. Chapman	SDLP 1371	N/A	Members of the Public	Land in question is occupied by gas, oil and water pipeline, which limits area for building. Additional home building may cause pollution and reduce air quality.	13. Energy	13.2 Energy supply				
Email	E.159	File M	Natalie Hale	SDLP 919	N/A	Members of the Public	Concern over traffic issues with proposed development	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.159	File M	Natalie Hale	SDLP 920	N/A	Members of the Public	Overstretched surgeries, lack of school places and concern over environmental harm (in particular air quality).	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.159	File M	Natalie Hale	SDLP 921	N/A	Members of the Public	Opposes converting Strood's Greenbelt to Grey belt as there are no exceptional circumstances to justify the change. Brownfield and underutilised land should be used instead, preserving the last remaining Greenbelt in the area. Concern over Inadequate biodiversity assessments, rising traffic issues, and wish to see agricultural land preserved.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Online	1663	Online (OPUS)	National Bargee Travellers Association (Ms Pamela Smith, Chair) [1663]	5015	N/A	Voluntary and Community Organisations	Boat dwellers on the River Medway face losing homes due to planning enforcement on leisure moorings. The NBTA highlights unmet need for residential moorings. Council should enable planning consent in the Local Plan.	6. Housing	6.7 Houseboats	Paragraph 6.7.1	No assessment of the accommodation needs of boat dwellers has been included in the Local Plan. This is contrary to Section Yes24 of the Housing and Planning Act 20Yes6. LPAs must assess the need for accommodation of people who live on boats when carrying out accommodation needs assessments. The outcome of the assessment should be included in the Local Plan together with plans for the designation of land for residential moorings and a commitment to grant planning consent to leisure moorings already in residential use. For information about best practice in boat dweller accommodation assessments we recommend the LPA consults the NBTA's Best Practice Guide for Boat Dweller Accommodation Needs Assessments https://bargee-traveller.org.uk/best-practice-guide/	Yes	To submit verbal evidence

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Online	1663	Online (OPUS)	National Bargee Travellers Association (Ms Pamela Smith, Chair) [1663]	5017	N/A	Voluntary and Community Organisations	The visual appearance of boats that are used as homes should not be a factor in deciding whether or not to grant planning consent or in any decision to designate land for moorings.	6. Housing	6.7 Houseboats	Paragraph 6.7.5		Yes	To give verbal evidence
Online	1663	Online (OPUS)	National Bargee Travellers Association (Ms Pamela Smith, Chair) [1663]	5019	N/A	Voluntary and Community Organisations	Policy T22 neglects residential moorings, ignores boat dwellers' needs, and fails to meet Housing Act 2016 obligations.	9. Transport	9.6 Marinas and moorings	Paragraph 9.6.6	The areas designated for leisure marina expansion should be changed to residential moorings and a presumption that the LPA will grant planning consent should be adopted in the case of all moorings that are being used residentially.	Yes	To give verbal evidence
Online	1663	Online (OPUS)	National Bargee Travellers Association (Ms Pamela Smith, Chair) [1663]	5020	N/A	Voluntary and Community Organisations	Smoke controls risk making boats uninhabitable in winter; energy transition must consider justice for those without clean alternatives.	6. Housing	6.7 Houseboats		A recognition of the different circumstances that apply to boat dwellers, who do not have access to the same choices for heating as those living on land.	Yes	To give verbal evidence
Online	1663	Online (OPUS)	National Bargee Travellers Association (Ms Pamela Smith, Chair) [1663]	5023	N/A	Voluntary and Community Organisations	Planned mooring relocation risks gentrification and displacing long-term boat dwellers. No affordable residential provision or s.124 consultation with NBT—community disruption must be avoided.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		Yes	To give verbal evidence
Email	E.124	File U	National Grid	SDLP 674	N/A	Statutory Bodies	Support the context section. Also noted in the 'Vision for Medway 2041' that Grain is recognised in this policy in the context of economic development, which is welcomed and supported. Also support paragraph 1.3.8.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.124	File U	National Grid	SDLP 675	N/A	Statutory Bodies	Support paragraph 3.1.6 in realising the full potential of key sites at Grain and Kingsnorth.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.6		No	
Email	E.124	File U	National Grid	SDLP 676	N/A	Statutory Bodies	Support this objective and securing jobs and need to develop jobs in the future. Also consider that making best use of brownfield land is vital in terms of delivery of strategically important sites.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change		No	
Email	E.124	File U	National Grid	SDLP 677	N/A	Statutory Bodies	Supports the need for green and blue infrastructure, it is important to note that the Local Plan sites referred to on the Proposals Map are not unduly restricted by some of the Tier 3 references in Figure 2. It is considered the strategic development and this infrastructure can be delivered in tandem with good design.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Figure 2: Green and Blue Corridors, from Medway Green and Blue Infrastructure Framework (Draft)		No	
Email	E.124	File U	National Grid	SDLP 678	N/A	Statutory Bodies	Paragraph 7.2.5 recognises the regeneration and redevelopment potential of employment sites at the Isle of Grain. National Grid is pleased that this is recognised in the Plan and is fully supportive of this approach.	7. Economic Development	7.2 Employment strategy	Paragraph 7.2.5		No	
Email	E.124	File U	National Grid	SDLP 679	N/A	Statutory Bodies	Strongly support the larger scale Net Zero Carbon Energy generating uses and port facilities at Grain. It is also vital to flag the important role that Grain currently plays in ensuring energy security during the transition towards 'net zero'. Recent world events have placed an increasing strain on energy supply and it is important that this security of supply is recognised.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy		No	
Email	E.124	File U	National Grid	SDLP 680	N/A	Statutory Bodies	It is noted that there could be some slight amendments to the Map in relation to the Isle of Grain [See Proposals Map comments]. However, the protection of the site for employment provision and industrial and energy related uses is supported. It is important that the mix of employment and energy related uses are considered in tandem during future development proposals at the Isle of Grain.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision	Amend Proposals map	No	
Email	E.124	File U	National Grid	SDLP 681	N/A	Statutory Bodies	It is vitally important that any amendments to the Grain branch facilitate and increase rail freight opportunities on this line. It is important that this link is maintained and improved all the way to the Isle of Grain at the end of the Hoop Peninsula.	9. Transport	9.4 Grain Branch	Paragraph 9.4.4		No	
Email	E.124	File U	National Grid	SDLP 682	N/A	Statutory Bodies	Support retaining existing riverside infrastructure. The safeguarding and future use of the existing network of piers and jetties is important for future strategic uses of these areas.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure		No	
Email	E.124	File U	National Grid	SDLP 683	N/A	Statutory Bodies	Welcome recognition of Grain's importance in energy infrastructure and delivery for the UK. The site at Grain is of national importance and it should be recognised as such in the emerging Local Plan. Also noted that there is significant power generation already in situ at the Grain Peninsula and there is expected need for associated carbon capture and storage technology to allow this power generation to be sustained into the future to ensure national energy security. Policy S25 is vital as it recognises that the Isle of Grain is a suitable location for renewable and low	13. Energy	13.2 Energy supply	Policy S25: Energy Supply		No	
Email	E.124	File U	National Grid	SDLP 684	N/A	Statutory Bodies	Paragraph 13.2.11 acknowledging the need for associated carbon capture and storage technology is also welcomed by National Grid.	13. Energy	13.2 Energy supply	Paragraph 13.2.11		No	
Email	E.124	File U	National Grid	SDLP 685	N/A	Statutory Bodies	The recognition of Grain Business Park at paragraph 14.15.9 as having an extant permission is welcomed. The principle of development at Grain is fully established and (rightly) strongly supported in this emerging Local Plan document. It is noted that this paragraph confirms that site's safeguarding under Policy S11 – Existing Employment provision.	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15.9		No	

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Email	E.124	File U	National Grid	SDLP 686	N/A	Statutory Bodies	In the Local Plan Proposals Map - Northeast, the 'existing employment areas' could be extended to cover the whole of the Grain LNG facility. It is an area of national significance for energy infrastructure and it is important this is recognised in the Local Plan. In addition, there is also a 'gap' at the southern end of the site to the south eastern corner of Aggregate Industries on the way down to the jetties that we believe that this should also included within the 'grey area' as this forms an important link between land and the ports note that policy S25 supports Energy Infrastructure on the Isle of Grain, but this is not at all reflected on the Proposals Map for Grain? Noting that some of the 'existing employment' area has an extant permission but remains undeveloped, we wondered if the Proposals Map needs to be updated to reflect all the areas which can be utilised for future development of this strategically important site and to fully match up with the policies in the text within the Plan?	3. Spatial Development Strategy	3.2 Policies Map	Policies map - North East	Amend Proposals Map	No	
Email	E.57	File U	National Grid Electricity Transmission (NGET)	SDLP 235	N/A	Statutory Bodies	A number of proposed development sites (HHH22, HHH31, HHH33) cross or are in close proximity to National Grid Electricity Transmission plc (NGET) assets. Without appropriate acknowledgement of the NGET assets this policy should not be considered effective as it cannot be delivered as proposed unencumbered by the constraints posed by the presence of NGET infrastructure. Object to policy wording as currently drafted. Proposed modification to policy wording suggested. Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise. The Council is requested to be mindful of the decarbonisation of the energy system to reach net zero emissions and use of more renewable energy sources and changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Propose add wording to Policy SA8: "Development will include a strategy for responding to the NGET Overhead Cable Route present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design."	No	
Email	E.57	File U	National Grid Electricity Transmission (NGET)	SDLP 236	N/A	Statutory Bodies	A number of proposed development sites (HHH35 & HHH36) cross or are in close proximity to National Grid Electricity Transmission plc (NGET) assets. Without appropriate acknowledgement of the NGET assets this policy should not be considered effective as it cannot be delivered as proposed unencumbered by the constraints posed by the presence of NGET infrastructure. Object to policy wording as currently drafted. Proposed modification to policy wording suggested. Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise. The Council is requested to be mindful of the decarbonisation of the energy system to reach net zero emissions and use of more renewable energy sources and changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	Propose add wording to Policy SA14: "Development will include a strategy for responding to the NGET Overhead Cable Route present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design."	No	
Email	E.85	File U	National Highways	SDLP 301	N/A	Statutory Bodies	Medway Council has engaged with NH constructively, actively and on an ongoing basis on strategic transport matters relating to the SRN during the preparation of the Local Plan. Content to capture the process in a SoCG and on this basis we have no objection in terms of legal compliance and/or duty to co-operate in connection with strategic road network related matters.	1. Overview	1.4 Duty to Cooperate			No	
Email	E.85	File U	National Highways	SDLP 302	N/A	Statutory Bodies	Soundness - Justified: Supporting evidence relating to transport. A number of documents are relevant to matters of interest to National Highways, of which National Highways has been consulted on and provided comments to 5 of the STA documents. The comments have been taken account of. We are content that these documents, subject to some continued joint working to evolve, finalise and agree all aspects (but especially with regards M2J1, M2J3 and M2J4), provide appropriate, proportionate evidence of how the methodology and assumptions applied to the Regulation 19 modelling and associated assessments have been developed and, in principle, agreed.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Transport Assessment		No	
Email	E.85	File U	National Highways	SDLP 303	N/A	Statutory Bodies	Soundness - Consistent with National Policy: Vision for Medway 2041 (Paragraph 2.1). This is generally consistent with the requirements of NPPF and C1/2022. However suggest the text is amended via a Minor Modification to also refer to connections to adjacent boroughs / authority areas which would increase the alignment with the Circular.	2. Vision and Strategic Objectives	2.1 Vision	Paragraph 2.1	Also refer to connections to adjacent boroughs / authority areas in the Vision.	No	
Email	E.85	File U	National Highways	SDLP 304	N/A	Statutory Bodies	The policy wording should make reference to the identification of transport measures or infrastructure as the means to deliver the reduced trip generation figures	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation	Make reference to the identification of transport measures or infrastructure as the means to deliver the reduced trip generation figures	No	

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Email	E.85	File U	National Highways	SDLP 305	N/A	Statutory Bodies	Paragraph 9.2.12 directly references the need for assessment of transport impacts to move away from “worst case” scenarios. This is welcomed. However, to correspond to Policy DM15, reference should be made to the measures which will deliver changes to trip demands and mode shares, as this is necessary in order for the justification and effectiveness tests of soundness to be met. It is considered that the reference to a “proportionate developer contribution discount” is premature and could undermine the ability of the Council to collect appropriate funding from developers for necessary transport improvements. This should be removed from paragraph 9.2.14.	9. Transport	9.2 Monitoring and managing development		Paragraph 9.2.12 - reference should be made to the measures which will deliver changes to trip demands and mode shares. Paragraph 9.2.14 - remove reference to a “proportionate developer contribution discount”.	No	
Email	E.85	File U	National Highways	SDLP 306	N/A	Statutory Bodies	Transport Assessments should be added to the list of documents all Allocations will need to submit at paragraph 14.1.7.	14. Site Allocations	14.1 Introduction	Paragraph 14.1.7		No	
Email	E.85	File U	National Highways	SDLP 307	N/A	Statutory Bodies	Further joint work involving Medway and Gravesham Councils, National Highways, Kent County highways and any relevant site promoters will be needed ahead of submission/ examination to discern, provide, assess and agree the necessary cross-boundary/ cumulative impact evidence. This will include a particular focus on the nearby M2J1 and the means by which this allocation can deliver active and sustainable transport.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.85	File U	National Highways	SDLP 308	N/A	Statutory Bodies	Policy SA7 and its text (And any other aspect of the Medway LP relying on the M2J4 improvement scheme) should be clear on the need for co-ordination with the Lidsing and Capstone Valley development, particularly with regard to the proposed upgrade to M2 J4 which Lidsing is expected to deliver during the lifetime of the emerging Medway Local Plan. Clarification is also required as to the degree of reliance the SA7 allocation (and/or any other allocations in the Medway LP) has on the delivery of the M2J4 4th arm. And how the LP and development will manage any circumstance where the Medway development needs the 4th arm to be in place yet the Lidsing site is not started or becomes stalled ahead of the delivery of the 4th	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Clarification is also required as to the degree of reliance the SA7 allocation (and/or any other allocations in the Medway LP) has on the delivery of the M2J4 4th arm. And how the LP and development will manage any circumstance where the Medway development needs the 4th arm to be in place yet the Lidsing site is not started or becomes stalled ahead of the delivery of the 4th arm.	No	
Email	E.85	File U	National Highways	SDLP 309	N/A	Statutory Bodies	Site Policy SA8: Hoo Peninsula lists four off-site junction improvements which the developers will be required to contribute to, the required upgrade to the M2 Junction 1 eastbound merge should be included. And, any other site allocations which are located in proximity to M2 Junction 1 should also include this improvement as one which developers will be required to contribute to.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Site Policy SA8: Hoo Peninsula should include the required upgrade to the M2 Junction 1 eastbound merge to the list developers will be required to contribute to.	No	
Email	E.85	File U	National Highways	SDLP 310	N/A	Statutory Bodies	The supporting text should be amended to make it clear that National Highways will not accept contributions toward or in lieu of works on the SRN. Nor will act as a “delivery partner”. Required works will need to be delivered either by the relevant developer or by the Local Authority (who may choose to collect contributions themselves to facilitate this).	10. Health, communities and Infrastructure	10.5 Infrastructure delivery		The supporting text in section 10.5 should be amended to make it clear that National Highways will not accept contributions toward or in lieu of works on the SRN. Nor will act as a “delivery partner”.	No	
Email	E.148	File U	Natural England	SDLP 805	N/A	Statutory Bodies	Recommendation - A common approach across policies to provide clarity. [Only] some policies include specific reference to avoiding or mitigating environmental impacts.	1. Overview	1.3 How the plan has been prepared				
Email	E.148	File U	Natural England	SDLP 806	N/A	Statutory Bodies	We welcome, the commitment within the Spatial Development Strategy wording to prepare masterplans for the large scale growth outside of the urban regeneration areas.	2. Vision and Strategic Objectives	2.1 Vision		We recommend that these masterplans should detail how they will contribute to landscape, ecology, green infrastructure enhancements and detail how they are contributing to the Local Nature Recovery Strategy in addition to the built form.		
Email	E.148	File U	Natural England	SDLP 807	N/A	Statutory Bodies	NE supports directing the spatial strategy for growth to locations which avoid, or minimise, the need for additional engineered flooding solutions and allow for nature-based solutions for coastal and surface water flooding...’. Also support for ‘the use of nature-based solutions, including multi-functional green and blue infrastructure to help species, habitats and people adapt to the effects of climate change’.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.148	File U	Natural England	SDLP 808	N/A	Statutory Bodies	We recommend that specific reference/policy wording is included within the Plan to comply with the requirements of the NPPF to provide clarity on how impacts to best and most versatile agricultural soils will be minimised - recommend that policy wording for soils should be more widespread through the Plan.	2. Vision and Strategic Objectives					

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Email	E.148	File U	Natural England	SDLP 809	N/A	Statutory Bodies	Policy broadly supported by NE but recommend strengthening of policy wording to help clarify how development will conserve and enhance Medway's rich environmental heritage .	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	The Council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy S3, Medway has Sites of Special Scientific Interest, a Marine Conservation Zone, the Kent Downs National Landscape, National Nature Reserves, Local Nature Reserves, irreplaceable habitat, such as ancient woodland and salt marsh, Local Wildlife Sites and roadside nature reserves, which have particular significance for the protection of habitats and species. The Kent and Medway Local Nature Recovery Strategy has identified other areas with opportunities to create or improve habitat to conserve and enhance biodiversity. The Council seeks to conserve, restore and enhance Medway's rich and diverse environmental assets, including statutory and non-statutory designated sites, priority habitats and species, and protected species, through the Local Plan. The Council will seek Development proposals will be expected to maximise opportunities, including through development, to support the implementation of the Kent and Medway Local Nature Recovery Strategy to strengthen biodiversity and the wider natural environment. Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species.		
Email	E.148	File U	Natural England	SDLP 810	N/A	Statutory Bodies	NE broadly support but recommend strengthening of the policy wording to help clarify how development will conserve and enhance Medway's rich environmental heritage in accordance with the NPPF and Policy S2.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites	The North Kent Estuary and Marshes designated sites in Medway comprise the following: • Medway Estuary and Marshes SPA; • Medway Estuary and Marshes Ramsar site; • Thames Estuary and Marshes SPA; • Thames Estuary and Marshes Ramsar site; • The Swale SPA; and • The Swale Ramsar site. Recreational disturbance impacts The Council supports a strategic approach to managing recreational impacts on the North Kent Estuary and Marshes designated sites, arising from new development. New residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Strategic Access Management and Monitoring Strategy (SAMMS), 'Bird Wise' Board, or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England. Bird Wise The SAMMS mitigation measures will be reviewed on a regular basis to reflect proposed growth from all LPAs within the Zone of Influence. Greater mitigation measures will be required for development within 16 metres of the designated sites, such		
Email	E.148	File U	Natural England	SDLP 811	N/A	Statutory Bodies	Support for enhanced SAMMS approach within HRA but is concerned it does not appear to be included in Policy wording. For completeness, and to ensure impacts do not result, we recommend the Policy S3 wording is amended along the line of suggestions in para. 5.3 – for large sites within the 6 kilometre zone of influence for the North Kent Designated Sites and/or development near to the coastal sites across Medway, not just restricted to the Hoo Peninsula including additional measures such as bespoke warden provision and access to high quality semi-natural greenspace will need to be considered on a case-by-case	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites	For large sites within the 6 kilometre zone of influence for the North Kent Designated Sites and/or development near to the coastal sites across Medway, not just restricted to the Hoo Peninsula including additional measures such as bespoke warden provision and access to high quality semi-natural greenspace will need to be considered on a case-by-case basis. (Rep para 5.3)		

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Email	E.148	File U	Natural England	SDLP 812	N/A	Statutory Bodies	NE supports this part of policy 'Development proposals will be required to demonstrate that they will enhance, restore or create landscapes' but recommends changes (see letter para. 2.18) to strengthen policy in relation to undeveloped coast and ensure that impacts to designated sites and wider biodiversity are avoided.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	'Development will be permitted in and alongside the undeveloped coast, only if: • A coastal location is essential, and no suitable alternative site exists along the developed coast. • They fall within a sustainable location that works with wider coastal processes and does not have up or down drift implications. • Are managing flood risk consistent with the River Medway and Swale Estuary Shoreline Management Plan, or its replacement. • The scenic, heritage or scientific nature conservation value and character of the undeveloped coast is maintained and, where appropriate, and consistent with Policy S3, public access to the coast is improved. • Contributes positively to the enhancement, restoration or creation of landscapes • Opportunities to restore coastal and estuarine processes to support the designated sites and nature recovery are		
Email	E.148	File U	Natural England	SDLP 813	N/A	Statutory Bodies	NE generally support policy but are concerned that if such a plan is only required to be part of the Design and Access Statement (a supporting document), it will have less weight than if it were to be required to be submitted as an integral application document. We would therefore support the Policy being amended to require it to be an integral application document.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	'The Council, and developments, will conserve and enhance the network of green and blue infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a SPA, Ramsar site and/or SAC, or candidate sites, and those of the Kent Downs National Landscape. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland. The Council supports will work to achieve the Green Infrastructure Principles and Standards set out in Natural England's Green Infrastructure Framework. Reflecting scale and context, new development must provide for multifunctional, varied, connected and accessible green infrastructure that reflects local character and supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, recognition and management of heritage features, recreation, positively benefits health and wellbeing, and seeks opportunities to strengthen the resilience of the natural environment. Major new development proposals will be expected to submit include a Green Infrastructure Plan as part of a Design and Access Statement* setting out how that proposal will meet policy/objectives/GI principles and standards. In this way, the Plan will work to achieve the requirements within the Green Infrastructure Standards for developments.		
Email	E.148	File U	Natural England	SDLP 814	N/A	Statutory Bodies	NE broadly support the policy wording, we would recommend there is a stronger focus on how developments will be assessed in terms of their landscape character and visual impacts to the Kent Downs.	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape	NE strongly support the inclusion of additional wording (to help to ensure the Plan is in accordance with the NPPF) requiring developments to be accompanied by a landscape and visual impact assessment considering the impacts to special qualities of the National Landscape and key visual receptors and for them to be landscape led: 'Development proposals within the Kent Downs National Landscape and its setting will need to be informed by a landscape and visual impact assessment (LVIA), considering the potential impacts to the special qualities of the Kent Downs. The LVIA will include an assessment of the impacts to both landscape character and visual receptors resulting from the		

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Email	E.148	File U	Natural England	SDLP 815	N/A	Statutory Bodies	Additional wording suggested by NE to strengthen policy.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Flood Risk Management - Where flood risk management infrastructure is required to address flood risk, all development should: - Manage flood risk consistent with the Shoreline Management Plan, or any replacement. - Liaise with the flood risk management authorities to identify and deliver flood risk management schemes to manage flood risk to existing communities and future development sites. This specifically would include the Environment Agency's Medway Estuary and Swale and the Thames Estuary 2100 programmes. - Identify how this infrastructure will be operated, funded and maintained for the lifetime of the development. - Ensure there is space for future maintenance or new flood risk management infrastructure. - Consider the consequences of flood risk management infrastructure failing or its design standard being exceeded. - Identify the legal requirement under the Habitats Regulations (2019) to provide compensatory habitat associated with sea level rise and the process known as coastal squeeze. The Environment Agency's Medway Estuary and Swale programme is delivering habitat compensation schemes to provide intertidal compensatory habitat. This is required as flood defence improvements and sea level rise are expected to cause losses to existing designated SPAs and Ramsar sites within the Medway Estuary and Swale area. - Contribute towards the Environment Agency's flood risk management programme to support:		
Email	E.148	File U	Natural England	SDLP 816	N/A	Statutory Bodies	Natural England recommend that the section on Adaptation to Climate Change within Policy DM1 could be significantly strengthened to help ensure the Plan is sound.	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Development must be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These measures could include: - Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, and low water use sanitary equipment. - Minimising vulnerability to flood risk by locating development in areas of low flood risk (making an allowance for climate change) and including mitigation measures including SuDs (in accordance with SuDs policy above). SuDs can also help with water scarcity and retaining freshwater on land rather than draining it to see, also contributes to biodiversity – therefore look to opportunities in the wider catchment. - Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management – nature-based solutions like restoring flood plain, slowing the flow, holding fresh water higher in the catchment and shading. - Measures to protect and enhance rivers as a valuable resource for wildlife and biodiversity, blue infrastructure and climate change resilience. - Development should not encroach within a minimum of 16m to tidal main rivers, unless justified by evidence at planning application stage, and agreed in consultation with the Environment Agency. Appraising and mitigating the risks of climate change on flooding in site specific flood risk assessments - Seek to take opportunities to restore coastal and estuarine		
Email	E.148	File U	Natural England	SDLP 817	N/A	Statutory Bodies	Natural England welcomes the commitment within Policy DM4 to ensure that developments will only be consented where adverse impacts from noise and light pollution to ecological receptors and the Kent Downs National Landscape are avoided or fully mitigated. We have however suggested some amendments below to help ensure that the requirements are clear and more closely align with the requirements within the NPPF.	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light	Amend Policy DM4: 'Where development proposals may result in noise or lighting impact: - a landscape and visual impact assessment for proposed developments within the Kent Downs National Landscape, and its setting, will be required considering the impacts to the special qualities will be required along with details of any required avoidance and mitigation measures; - an ecological assessment for developments within a relevant SSSI impact risk zone, along with details of any required avoidance and mitigation measures, will be required.'		
Email	E.148	File U	Natural England	SDLP 818	N/A	Statutory Bodies	To comply with Paragraph 156(c) & 159 of the NPPF NE suggest additional text to policy.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt	Policy S7: 'the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.'		
Email	E.148	File U	Natural England	SDLP 819	N/A	Statutory Bodies	Support - for policy T1 - strongly encourage reference to GIF within the Local Plan to ensure that developments deliver truly inclusive greenspaces for new and existing residents.	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenity			

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Email	E.148	File U	Natural England	SDLP 820	N/A	Statutory Bodies	Support for policy but suggested wording change to strengthen policy.	6. Housing	6.7 Houseboats	Policy T7: Houseboats	Remove 'aim to' from policy text		
Email	E.148	File U	Natural England	SDLP 821	N/A	Statutory Bodies	Welcomes the Council's commitment to explore opportunities for nature based tourism that supports the economy whilst conserving and enhancing Medway's rich natural environment and builds upon opportunities including the King Charles III England Coast Path	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Policy T13: Tourism, culture and visitor accommodation			
Email	E.148	File U	Natural England	SDLP 822	N/A	Statutory Bodies	Natural England notes that Policy T14 specifically references the need to ensure that new employment land will be supported where it does not lead to the 'significant loss of high-grade agricultural land'. Footnote 65 of the NPPF details that 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'. The Plan does not appear to include a specific policy relating to the conservation of best and most versatile agricultural soils through development allocations and we would recommend such a policy is included. Rep para. 1.4	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Email	E.148	File U	Natural England	SDLP 823	N/A	Statutory Bodies	NE recommend the policy wording is strengthened to make it clearer how developments will be assessed during their determination. See suggested amendments.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure	'Developments for riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate that impacts to designated sites are avoided or fully mitigated adequate mitigation and will also result in no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale.'		
Email	E.148	File U	Natural England	SDLP 824	N/A	Statutory Bodies	NE recommend the policy wording which more closely reflects requirements of Policy S2. See suggested amendments.	9. Transport	9.6 Marinas and moorings	Policy T22: Marinas and moorings	Planning permission for marinas and moorings will be granted if the application demonstrates how the proposed development:...		
Email	E.148	File U	Natural England	SDLP 825	N/A	Statutory Bodies	Natural England notes the Plan's aspirations for Rochester Airport to 'provide an enhanced aviation facility... and support the development of a strategic gateway and an economic hub'. We would strongly recommend the Policy is amended to ensure that significant impacts to the Kent Downs National Landscape and its setting are avoided as a result of Policy T23. Given the flightpaths from the airport to the south pass over the Kent Downs National Landscape, any increase in flights should ensure that no impacts result and we would recommend the Policy is amended to reflect this. In addition, we strongly recommend that the Policy includes the need to ensure that visual impacts to the setting of the Kent Downs National Landscape are minimised through careful design, building form, height and finish. Extensive work was undertaken for the Innovation Park Medway in terms of design codes and we would recommend similar wording/requirements are included by the Council in Policy T23 to ensure consistency with Policies S4 and S6 and the NPPF	9. Transport	9.7 Aviation	PolicyT23: Aviation			
Email	E.148	File U	Natural England	SDLP 826	N/A	Statutory Bodies	Natural England welcomes the Plan's ambition to reduce health inequalities and support residents' health and wellbeing. The natural environment can play a significant part in supporting people's health and wellbeing with well designed, accessible and inclusive natural greenspaces playing a key role in promoting these. Whilst we have made comments on Policy S5 above, we would strongly recommend that the Council makes a stronger reference in Policy T27 to ensuring developments work towards the national Green Infrastructure Framework and associated Green Infrastructure Standards, including maximising	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.148	File U	Natural England	SDLP 827	N/A	Statutory Bodies	Natural England welcomes and notes the Council's criteria for the quantum and location of open space provision within Policy DM21 but as mentioned previously, would strongly encourage a commitment to embed the Green Infrastructure Standards within the Local Plan to ensure that developments are sustainable and deliver multiple benefits for people and wildlife	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Email	E.148	File U	Natural England	SDLP 828	N/A	Statutory Bodies	NE notes that the Council is expecting imported minerals to provide the required mineral resource during the plan period, we are concerned that the wording within Policy T33 could lead to significant environmental impacts. We would therefore recommend that the policy wording is strengthened to ensure that significant ecological impacts and landscape impacts are avoided to be consistent with other policies within the Plan and the NPPF. See amendment	11. Minerals Supply	11.5 Extraction of land won minerals	Policy T33: Extraction of land won minerals	'Any development for the extraction of land won minerals will need to demonstrate that ecological and landscape impacts can be avoided or fully mitigated'		

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Email	E.148	File U	Natural England	SDLP 829	N/A	Statutory Bodies	NE strongly recommends that reference is made within Policy T35 to ensure that proposals for additional waste management facilities will be supported where any ecological and landscape impacts are avoided or fully mitigated. We would support the same suggested additional wording (repeated below) being included for Policy T35.	12. Waste Management	12.5 Provision of new waste management facilities	Policy T35: Provision of additional waste management facilities	'Any development for the extraction of land won minerals will need to demonstrate that ecological and landscape impacts can be avoided or fully mitigated'		
Email	E.148	File U	Natural England	SDLP 830	N/A	Statutory Bodies	Natural England recommends that, given the proximity of Kingsnorth and the Isle of Grain sites to designated sites and priority habitats, the policy wording is either strengthened to ensure that environmental impacts are avoided or fully mitigated or specific reference is made to the developments needing to be in accordance with other policies (as is the case for Policy T37, for example).	13. Energy	13.2 Energy supply	Policy S25: Energy Supply			
Email	E.148	File U	Natural England	SDLP 831	N/A	Statutory Bodies	The Local Plan is instrumental in ensuring that developments which avoid or have the least environmental impact are allocated. As detailed above, the apparent deferral of the Hoo Peninsula Strategic Environmental Programme until after the adoption of the Local Plan provides uncertainty at this stage that the allocations in this area can avoid or fully mitigate their impacts and meet the tests of soundness.	14. Site Allocations					
Email	E.148	File U	Natural England	SDLP 832	N/A	Statutory Bodies	NE welcomes and supports the requirement for developments to contribute to the provision of green and blue infrastructure.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Email	E.148	File U	Natural England	SDLP 833	N/A	Statutory Bodies	NE welcomes Policy SA4 for the residential developments within the River Waterfront to ensure that adverse impacts to the Medway Estuary and Marshes SPA, Ramsar Site and SSSSI (including functionally linked land) to be avoided. Given the scale of the development (up to 4,197 residential units) and its close proximity to the Medway Estuary and Marshes SPA and Ramsar site	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	In addition to the standard financial contribution to the Strategic Access Management and Monitoring Strategy (SAMMS), bespoke additional measures will also need to be provided, and we would recommend the Policy is amended to reflect this		
Email	E.148	File U	Natural England	SDLP 834	N/A	Statutory Bodies	Point 10 of Policy SA4 details that land reclamation, reconfiguration of boat moorings along with flood mitigation or a flood defence wall will be required for GN15. The Medway Estuary Marine Conservation Zone (MCZ) is contiguous with the boundary of the River Waterfront allocation and impacts to the MCZ should also be avoided or fully mitigated.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	To ensure the allocation is sound we advise that the Policy is amended to require impacts to the MCZ to be avoided or fully mitigated.		
Email	E.148	File U	Natural England	SDLP 835	N/A	Statutory Bodies	Natural England welcomes the wording within Policy SA6 requiring the development to be landscape led and 'take account of the setting of the Kent Downs National Landscape' we consider the wording should be strengthened to ensure it aligns more closely with the requirements of the NPPF. We would also recommend that the Policy includes reference to the Kent Downs National Landscape Management Plan and associated guidance such as the Guidance on the selection and use of colour in development frameworks.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.148	File U	Natural England	SDLP 836	N/A	Statutory Bodies	Given the location of the Capstone Valley allocation covered by Policy SA7 in the setting of the Kent Downs National Landscape, Natural England would expect specific reference to the National Landscape to have been included within the Policy wording. We would recommend the inclusion of additional wording requiring a landscape led, high-quality design, sensitive to the setting and special qualities of the National Landscape to be included within Policy SA7.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Recommendation that the Policy is updated to ensure it complies with the requirements of the NPPF and Policies S4 and S6 of the Local Plan consultation. Such an approach is supported by the narrative in Table 12.1 of the Sustainability Appraisal		

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Email	E.148	File U	Natural England	SDLP 837	N/A	Statutory Bodies	- Natural England has significant concerns regarding the proposed allocations at Hoo St Werburgh and Chattenden and the soundness of Policy SA8, specifically that information Cumulative Ecological Impact Assessment and Nightingale Impact Assessment (for the Chattenden Woods and Lodge Hill SSSI), does not appear to have been reflected in the Plan or allocations. - The Local Plan should ensure that allocations can avoid or fully mitigate their impacts to designated sites and support a strategic approach being secured to ensure impacts do not result to designated sites, including the Chattenden Woods and Lodge Hill SSSI. - The Interim Sustainability Appraisal Report prepared for the previous Regulation 18 Local Plan consultation recommended that 'The findings and recommendations of the emerging Cumulative Ecological Impact Assessment should be taken into account with the MLP, to ensure that development avoids harm to sensitive biodiversity assets including the Chattenden Woods and Lodge Hill SSSI'. - Natural England notes the Policy support for development to be delivered in accordance with a masterplan including green infrastructure (Point 5) and that 'Growth will be directed within a strategic environmental framework that will define the outward development of Hoo and Chattenden. This will provide an effective buffer to sensitive habitats...' (Point 16 of the Policy) (our emphasis). Similarly Point 19 details that 'A strategic environmental management plan will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the nature	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	To ensure that Policy SA8 is sound and that impacts to the designated sites can be avoided or fully mitigated, Natural England recommend that greater clarity on the measures that will be secured by the Strategic Environmental Management Plan are included within the Policy.		
Email	E.148	File U	Natural England	SDLP 838	N/A	Statutory Bodies	Amendment suggested due to proximity of the allocations within Policy SA9 to the Northward Hill SSSI.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Recommend a specific criteria is included to ensure that direct and indirect impacts to the SSSI are avoided or fully mitigated and that opportunities are maximised to enhance the site		
Email	E.148	File U	Natural England	SDLP 839	N/A	Statutory Bodies	Concern raised that policy refers to the potential need for compensation measures following a project level Habitats Regulations Assessment. Through the Local Plan, developments which avoid or fully mitigate their impacts should be preferentially allocated over those requiring compensation. Given the close proximity to the coastal designated sites, in addition to the payment towards the Thames, Medway and Swale Estuaries SAMMS, additional site specific mitigation for recreational disturbance is also likely to be required.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	'Development will ensure, via a Habitats Regulations Assessment, that direct and indirect impacts will be avoided or fully mitigated and, if required, compensation and/or mitigation will to be agreed with Natural England and Medway Council. a. The requirements in policies S2 and S3 must be applied, given the sensitive location including the need to bespoke measures to mitigate for recreational disturbance impacts. b. Any enhancement in waterfront accessibility will have no adverse impact upon the integrity of the Special Protection Area and Ramsar designations, either alone or in-combination.'		
Email	E.148	File U	Natural England	SDLP 840	N/A	Statutory Bodies	Given the proximity of the Frindsbury Peninsula to the MCZ, it is important that impacts are avoided or fully mitigated, and we therefore recommend that Policy SA13 (and S2?) are amended	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	NE recommend that specific wording is included for the Marine Conservation Zone (MCZ) and Sites of Special Scientific Interest.		
Email	E.148	File U	Natural England	SDLP 841	N/A	Statutory Bodies	Due to the proximity of some of the employment sites to the MCZ and SSSIs, our detailed comments and suggested additions to Policy S2 are applicable to Policy SA14.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	See suggested amendments which also apply to Policy SA14.		
Email	E.148	File U	Natural England	SDLP 842	N/A	Statutory Bodies	Given the location of Innovation Park Medway in the setting of the Kent Downs National Landscape, we would expect the Policy to ensure that the Policy references the need for the development to sensitively designed	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	We have recommended policy amendments for Policy T23 and recommend the previously agreed design parameters for Innovation Park Medway and Policy S6 are referenced within Policy SA14		
Email	E.148	File U	Natural England	SDLP 843	N/A	Statutory Bodies	Natural England welcomes the inclusion of indicators for monitoring the adverse sustainability impacts of the Local Plan in Table 17.1 for biodiversity and landscape. For the biodiversity indicators, it is unclear what data will be used to inform some of these. For example how will the Council monitor the areas of priority habitats or populations of priority species within Medway	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal	It would be helpful for clarity to be provided on how these measures will be effectively monitored to ensure the Plan doesn't adversely impact the biodiversity of the area. Given the number of allocations that have the potential to affect the Kent Downs National Landscape, Natural England would strongly recommend that specific indicators for the National Landscape are included		

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Email	E.148	File U	Natural England	SDLP 844	N/A	Statutory Bodies	Natural England notes an interim Habitats Regulations Assessment (HRA) has been prepared as all elements are not yet finalised, most notably the air quality assessment and consideration of the effectiveness of the Hoo Peninsula Environmental Programme. Based upon the wording of Policy S2, it does not appear that the Hoo Peninsula, Strategic Environmental Programme will be finalised prior to the adoption of the Local Plan. Contrary to Section E8 of interim HRA Given the HRA narrative and our concerns regarding Policies S2 and SA8, Natural England would welcome clarity from the Council on the timeframe for reaching agreement on the Strategic Environmental Programme. Support for the summary of potential impact pathways to European sites provided within Table 3.7 of the interim HRA. The section on urbanisation effects of the HRA appears to focus primarily on the urbanisation effects of development allocations to the designated sites and associated functionally linked land rather than also considering the loss of functionally linked land. We note that the HRA details the requirement for bird, invertebrates and plant surveys at the project level to inform mitigation measures. It is unclear from the information provided within the HRA whether there is likely to be significant loss of functionally linked land through the Plan and we would therefore recommend greater clarity is provided to give confidence that mitigation measures can be delivered. In addition, the HRA makes reference to the information contained within the Cumulative Ecological Impact Assessment but this does not	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Email	E.111	File R	Naushabah Khan MP	SDLP 478	N/A	MPs, Members and Parish Councils	Have significant concerns with including the orchard site, off Pump Lane (Lower Rainham), Site RN9 . This allocation is not supported. difficult to see how this allocation will not create the same pressures that failed the previous application. This includes harm to the countryside, increased traffic congestion, harm to the landscape and local heritage, as well as the loss of valuable agricultural land. Wish to understand what consideration has been given to the 'brownfield first' approach and if alternative sites (in the local area), with better existing infrastructure provision have been ruled out in its favour? Greatest concern is that the current spread of sites does not trigger the infrastructure improvements, specifically to the road network, that we require to support the proposed housing delivery in certain locations.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		No	
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1564	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1565	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1566	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1567	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1568	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1569	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1570	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1571	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1572	N/A	Members of the Public	Redeveloping Chatham Docks risks job losses and erodes Medway's heritage	3. Spatial Development Strategy					

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Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1573	N/A	Members of the Public	Green Belt loss near Strood threatens biodiversity and wellbeing.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1574	N/A	Members of the Public	Proposed growth would worsen strain, reducing residents' quality of life.	10. Health, communities and Infrastructure	10.2 Health and wellbeing				
Hoo Peninsula Campaign (Additional responses)	H.28	File Q	Neil Harris & Marie-Jose Harris	SDLP 1575	N/A	Members of the Public	Infrastructure is overstretched, with no clear funding for services	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.164	File U	Network Rail	SDLP 961	N/A	Statutory Bodies	Supports the policy's intent but recommends: *The use of appropriately worded conditions is a key part of the toolkit for securing new infrastructure and ensuring this is funded. *Early engagement with infrastructure providers (including Network Rail). *Flexibility for infrastructure delivery pre-commencement where safety is a concern.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery	Applications can demonstrate that there is sufficient infrastructure capacity to support what is proposed following sufficient engagement with relevant infrastructure providers and their agreement that no mitigations are required. Onsite delivery of infrastructure ahead of commencement or occupation.		We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 962	N/A	Statutory Bodies	Criticises the lack of integration between proposed development areas and existing/potential railway corridors. Notes poor rail service to growth areas like the Hoo Peninsula and absence of commitment to new stations or enhanced services. Supports safeguarding land for rail improvements (e.g. Strood transport hub), but highlights the lack of a linked policy to secure delivery. Calls for a more balanced strategy that includes rail alongside active travel and road transport.	3. Spatial Development Strategy					We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 963	N/A	Statutory Bodies	Supports inclusion of transport policies but criticises the absence of a clear rail improvement strategy or collaboration with Network Rail and operators.	9. Transport					We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 964	N/A	Statutory Bodies	Supports active travel corridor; recommends extending the route to Gillingham station and updating policy wording to reflect this. This would ensure that the Plan fully considers the whole public transport network and links these together to provide integrated transport options as required in the NPPF. The absence of this means that the Policy may be unsound.	9. Transport	9.3 Active travel interventions	Policy DM16: Chatham Waters line	and the rail station.'		We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 965	N/A	Statutory Bodies	Supports safeguarding land for rail infrastructure but notes lack of funding and current proposals maximising Strood station through an improved interchange facility connections with the town centre and alongside infrastructure changes to the station could allow for improved rail services. This could provide sufficient capacity to accommodate growth within the Hoo Peninsula alongside the Frindsbury Peninsula Opportunity Area. Ensure integrated transport options as required in the NPPF. The absence of this means that the policy may be unsound	9. Transport	9.4 Grain Branch	Policy DM17: Grain Branch	In addition, NR suggests the following amendments are made to the supporting text: 9.4.1 The government has described its strategic vision for rail, including commitments to expand the network to boost housing and economic growth, reinforce the importance of rail freight to support the economy and the environment and to explore opportunities to restore routes withdrawn during the 1960s and 1970s in 1961. 9.4.2 Passenger services were withdrawn from the Grain Branch in 1961, however the line continues to facilitate the import/export of aggregates, along with rail freight associated with the aviation fuel storage depot and Thamesport activity. The line is of national strategic importance by providing aviation fuel to Heathrow Airport. Should expansion of Heathrow Airport go ahead then there is potential that there may be a requirement to increase the number of aviation fuel trains from the fuel terminal on the Isle of Grain. 9.4.4 A rail passenger connection at Sharnal Street would provide a focus for future growth and improved travel choice. Moreover, it would: • underpin a wider strategy in conjunction with exemplary approaches to design and green infrastructure; • serve an improved employment offer at Kingsnorth; and • allow for increased rail freight to/from the Isle of Grain. There is a wider rail freight growth target set by the UK government. In December 2023, the UK government		We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.

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Email	E.164	File U	Network Rail	SDLP 966	N/A	Statutory Bodies	The rail network must be considered when assessing potential development sites, either for allocation or during the determination of a planning application. The Plan does not provide measurable targets or monitoring indicators for rail usage, service frequency, or infrastructure delivery. This undermines the ability to assess progress and suitable ensure necessary infrastructure has been funded. Reference to this should also be included within the draft Policy.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans	NR propose the following wording to be added to the draft Policy: 'Where impacts on the rail network have been identified the Council will work with Network Rail to secure suitable mitigation'.		We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 967	N/A	Statutory Bodies	Annual updates to the Infrastructure Delivery Plan (IDP) with input from Network Rail.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan	Annual updates to the Infrastructure Delivery Plan (IDP) with input from Network Rail.		We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 968	N/A	Statutory Bodies	Supports safeguarding of rail depots and mineral supply infrastructure. Encourages improvements and new rail connections where feasible.	11. Minerals Supply	11.3 Safeguarding of existing mineral supply infrastructure	Policy T31: Safeguarding of existing mineral supply infrastructure			We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 969	N/A	Statutory Bodies	Supports allocation near Chatham station. Recommends a new station entrance and cautions against overly restrictive design requirements. Further, development should be maximised given the location of the site and therefore the dwelling figure of 121 should be a minimum. NR notes the reference in SA1 to the need for sensitive design and a masterplan. FP21.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			We reserve the right to attend and participate at the Local Plan Examination in Public and provide any additional information as required.
Email	E.164	File U	Network Rail	SDLP 970	N/A	Statutory Bodies	Advises against balconies facing tracks and recommends securing contributions to station improvements. External materials should not cause glare that would impact train drivers or affect any of the signalling equipment. Any development should also engage with NR's Asset Protection Team. FP1 RWR19.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites			
Email	E.164	File U	Network Rail	SDLP 971	N/A	Statutory Bodies	Supports master planning and transport interchange near Strood station. Encourages consultation with Network Rail and ASPRO.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds			
Email	E.164	File U	Network Rail	SDLP 972	N/A	Statutory Bodies	Sees opportunity for modal shift and contributions to Strood station improvements. The Council should work with NR to determine any capacity constraints or opportunities that could be taken advantage of to encourage modal shift.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.164	File U	Network Rail	SDLP 973	N/A	Statutory Bodies	Welcomes safeguarding of rail land but calls for a clear strategy and funding mechanism (e.g. land value capture) to support future passenger services.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.164	File U	Network Rail	SDLP 974	N/A	Statutory Bodies	Recommends assessing impacts on Rainham station level crossing and promoting active travel with contributions to station facilities. RN9 – Pump farm and Bloors Farm. This site is near the railway. Any development should ensure that anti-trespass fencing is applied around the site boundary (at least 1.8m high) to prevent trespass onto the railway and to maintain the safe and efficient running of the railway. Any development should also engage with NR's Asset Protection Team.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	'Development must consider the impact on the at grade road crossing to the east of Rainham station, for its own impact and that with committed development. Any assessments should be approved by Network Rail'.		
Email	E.164	File U	Network Rail	SDLP 975	N/A	Statutory Bodies	Advises on safety measures (e.g. anti-trespass fencing) and engagement with Network Rail for sites near railway. RN30.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites			
Email	E.164	File U	Network Rail	SDLP 976	N/A	Statutory Bodies	Recommends linking the policy to improvements at Strood station to support active travel and emissions reduction.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area			
Email	E.110	File U	NHS Kent and Medway	SDLP 470	N/A	Statutory Bodies	Existing NHS primary and community care facilities in Chatham will not support the proposed growth of 4197 new homes. NHS is concerned of the potential impact this will have on the Medway Foundation Trust.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Email	E.110	File U	NHS Kent and Medway	SDLP 471	N/A	Statutory Bodies	* Refreshed feasibility and infrastructure needs assessment for Strood is underway - including Strood West and Peninsula. * Policy SA5 details site SNF20 as a new/improved healthy living centre. NHS have not concluded investigations and cannot confirm this site allocation. This also includes SA6 Strood West and SA13 Frindsbury Peninsula Opportunity Area.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds			

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Email	E.110	File U	NHS Kent and Medway	SDLP 472	N/A	Statutory Bodies	* Refreshed feasibility and infrastructure needs assessment for Strood is underway - including Strood West and Peninsula. * Policy SA5 details site SNF20 as a new/improved healthy living centre. NHS have not concluded investigations and cannot confirm this site allocation. This also includes SA6 Strood West and SA13 Frindsbury Peninsula Opportunity Area	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.110	File U	NHS Kent and Medway	SDLP 473	N/A	Statutory Bodies	* Refreshed feasibility and infrastructure needs assessment for Strood is underway - including Strood West and Peninsula. * Policy SA5 details site SNF20 as a new/improved healthy living centre. NHS have not concluded investigations and cannot confirm this site allocation. This also includes SA6 Strood West and SA13 Frindsbury Peninsula Opportunity Area	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area			
Email	E.110	File U	NHS Kent and Medway	SDLP 474	N/A	Statutory Bodies	NHS needs to consider Capstone Valley planned growth alongside Lidsing and existing infrastructure. Please remove reference to LW6 East Hill including a GP. This has been clarified as part of previous permission which didn't include a GP	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Please remove reference to LW6 East Hill including a GP.		
Email	E.110	File U	NHS Kent and Medway	SDLP 475	N/A	Statutory Bodies	HHH22 identified as the preferred location for a main centre including healthcare facility. NHS will need to understand phasing of development and timing for delivery of health facility. Strategic master planning should look to encourage delivery of an integrated healthcare facility (at no cost to the NHS)	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.110	File U	NHS Kent and Medway	SDLP 476	N/A	Statutory Bodies	Health hub not required as part of RN9. The existing Rainham Healthy Living Centre is expected to be reconfigured using S106.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Remove need for health hub		
Email	E.110	File U	NHS Kent and Medway	SDLP 477	N/A	Statutory Bodies	* Developer contributions guide: reflect NHS developer guide as part of MC guide - within the health section. * Healthcare facilities should be delivered at no cost.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Developer Contributions Guide			
Email	E.26	File U	NHS Property Services (NHSPS)	SDLP 82	N/A	Statutory Bodies	Policy S24: Policy requires developer contributions and T29 sets a threshold. Support continued working to refine this through IDP. Provide flexibility to choose the most appropriate approach. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.26	File U	NHS Property Services (NHSPS)	SDLP 83	N/A	Statutory Bodies	Policy T27: Supportive of mention of healthy lifestyles. The policy requires demonstration of criterion (a) and (b) to justify the loss of healthcare facilities. Request policy T27 to reflect and incorporate wording in line with T29 regarding the loss.	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	Add a criterion (c) as follows: c) In the case of healthcare facilities, where these are declared as surplus to the operational healthcare requirements, as part of a published estates strategy or transformation plan of the NHS, the requirements listed under parts (a.) and (b.) of the Policy will not apply.		
Email	E.26	File U	NHS Property Services (NHSPS)	SDLP 84	N/A	Statutory Bodies	Policy T29: It is unclear whether healthcare facilities are subject to the full criterion of the policy alongside the additional criterion specific to healthcare facilities. NHSPS recommend that the policy and supporting text clearly sets out that where health facilities have been declared by the NHS as surplus to requirements, or will be changed as part of wider NHS estate reorganisation and service transformation programmes, that this will sufficiently satisfy the requirements of the policy.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities & Paragraph 10.4.7	Amend as follows: In the case of healthcare facilities, where these are declared as surplus to the operational healthcare requirements, as part of a published estates strategy or transformation plan of the NHS, the requirements in the above points of the Policy will not apply. • Proposals for new community facilities should: ... o Healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan." Proposed modification to Supporting Paragraph 10.4.7: "For proposals that involve the loss of community (including shops), health and cultural facilities, the Council will require evidence firstly that an alternative facility or facilities can be found within easy walking distance, where planning permission is required. Evidence will need to demonstrate that there is at least one such facility which offers services and an environment comparable to that of the facility subject to the proposal. In the case of healthcare facilities, where these are declared as surplus to the operational healthcare requirements, as part of a published estates strategy or transformation plan of the		
Email	E.26	File U	NHS Property Services (NHSPS)	SDLP 85	N/A	Statutory Bodies	Policy SA5: welcomes the inclusion of site SNF 20, but development quantum is yet to be determined.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds			

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Email	E.26	File U	NHS Property Services (NHSPS)	SDLP 86	N/A	Statutory Bodies	Viability Assessment: welcomes the separate cost applied to health but request a discussion on figures applied.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.3	File L	Nicholas Hance	SDLP 4	N/A	Members of the Public	Concern over lack of fully integrated public transport network across Medway. Concern about the following : • Increase in traffic on Peninsular. Need for major road improvement scheme before new houses are developed. Flyover junction at Four Elms Hill and traffic lights to enable traffic from Upnor/Wainscott to join access the A289 at Four Elms Hill and Wilfere Way. • Concern over development on high quality farmland and high level of house building in densely populate, congested and polluted areas. Road funding is needed in advance of	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			
Email	E.180	File M	Nick Dowling	SDLP 1158	N/A	Members of the Public	The Local Plan should embed active transport in design, prioritise development near public transport hubs, and adopt proven models promoting health through sustainable mobility and sustainable planning to combat health and climate crisis.	9. Transport					
Email	E.180	File M	Nick Dowling	SDLP 1159	N/A	Members of the Public	Medway should adjust their housing projections to take into account national policy	1. Overview	1.3 How the plan has been prepared				
Email	E.180	File M	Nick Dowling	SDLP 1160	N/A	Members of the Public	Both Medway Council and Gravesham Borough Council should undertake a cross boarder green belt assessment in order to fully understand the impact of their current joint proposals at west of Strood and Chapter farm	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.23	File L	Nicola Smith	SDLP 61	N/A	Members of the Public	Preservation of green belt land - it is a vital ecological and recreational resource that supports biodiversity, provides essential green space for residents' wellbeing, and contributes to the overall environmental health of the region and climate. There are opportunities for brownfield site development and the regeneration of underutilised urban areas that can accommodate growth without compromising green spaces	4. Natural Environment	4.12 Green Belt				
Email	E.23	File L	Nicola Smith	SDLP 62	N/A	Members of the Public	Agricultural value of Chapter Farm, against downgrade to grey belt for development purposes.	4. Natural Environment	4.12 Green Belt				
Email	E.23	File L	Nicola Smith	SDLP 63	N/A	Members of the Public	Chapter Farm is also the home to a live oil pipeline that feeds UK airports. This pipeline is a critical piece of infrastructure, and any development in this area would pose significant risks to its operation and could cause serious health and safety risks to local residents	11. Minerals Supply	11.2 Safeguarding mineral resources				
Email	E.23	File L	Nicola Smith	SDLP 64	N/A	Members of the Public	Chapter Farm is also the home to a live oil pipeline that feeds UK airports. This pipeline is a critical piece of infrastructure, and any development in this area would pose significant risks to its operation and could cause serious health and safety risks to local residents	13. Energy	13.2 Energy supply				
Email	E.23	File L	Nicola Smith	SDLP 65	N/A	Members of the Public	*Evidence of early talks with property developers and predetermined voting by Labour Councillors. *The consultation should have been 12 weeks, but we only had 6 weeks conveniently clashing with school summer holidays. *4.12.3 and 4.12.4 Medway Council states grey belt policy change for Strood green belt - there was absolutely no mention of this to the public. This first came to light at the Council Meeting on 26 th June 2025 when the public gallery is not allowed to comment. Why was the review not made available for consultation?	4. Natural Environment	4.12 Green Belt	Paragraphs 4.12.3 and 4.12.4			
Email	E.23	File L	Nicola Smith	SDLP 66	N/A	Members of the Public	4.10.5. Why commission landowners and developers to prepare a high-level plan to inform the framework of policy? Better community engagement needed.	4. Natural Environment	4.10 Air quality	Paragraph 4.10.5			
Email	E.23	File L	Nicola Smith	SDLP 67	N/A	Members of the Public	The proposed development would place additional strain on the existing infrastructure and services in the area. Green belt is used by the Kent Air Ambulance as a landing platform. This is a critical service that provides emergency medical assistance to residents in need	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.74	File L	Nigel and Rosalyn Leonard	SDLP 289	N/A	Members of the Public	Request that an Article 4 Direction is seriously considered to be adopted in the future for the whole of Medway, in order to prevent an unprecedented increase in the current level of Applications for Lawful Certificates of Development relating to proposed changes of use of C3 dwellings to HMOs (C4)	6. Housing	6.8 Houses of multiple occupation			No	
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 536	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 537	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 538	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites			

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Email & OPUS	E.117	File B	Nightingale Homes	SDLP 539	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 540	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.9 Contaminated land	Policy DM2: Contaminated Land			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 541	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 542	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.11 Noise and light pollution	Policy DM4: Noise and Light			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 543	Tetlow King (Iain Warner)	Developers or Agents	Support	5. Built Environment	5.2 High quality design	Policy T1: High Quality Design and Amenity			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 544	Tetlow King (Iain Warner)	Developers or Agents	The policy should be in conformity with the terms of the NPPF, presently set out at paragraph 189.	4. Natural Environment	4.7 Kent Downs National Landscape	Policy S6: Kent Downs National Landscape			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 545	Tetlow King (Iain Warner)	Developers or Agents	Support	5. Built Environment	5.7 Historic environment	Policy S8: Historic Environment			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 546	Tetlow King (Iain Warner)	Developers or Agents	Support	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 547	Tetlow King (Iain Warner)	Developers or Agents	Support	6. Housing	6.2 Housing mix	Policy T2: Housing Mix			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 548	Tetlow King (Iain Warner)	Developers or Agents	Support	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 549	Tetlow King (Iain Warner)	Developers or Agents	need evidence to support additional requirements.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 550	Tetlow King (Iain Warner)	Developers or Agents	Support. Consider impacts on employment	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 551	Tetlow King (Iain Warner)	Developers or Agents	Support but concerned about general approach to how development options will be considered.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 552	Tetlow King (Iain Warner)	Developers or Agents	Support	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 553	Tetlow King (Iain Warner)	Developers or Agents	60 units as a maximum may not be reflective of reality. Requirement to exceed national and local design guidance is objected to and requiring policy specific requirement like heritage impacts.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 554	Tetlow King (Iain Warner)	Developers or Agents	Support	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 555	Tetlow King (Iain Warner)	Developers or Agents	Support	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 556	Tetlow King (Iain Warner)	Developers or Agents	Support	9. Transport	9.7 Aviation	Policy T23: Aviation			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 557	Tetlow King (Iain Warner)	Developers or Agents	Support	9. Transport	9.8 Urban logistics	Policy T24: Urban logistics			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 558	Tetlow King (Iain Warner)	Developers or Agents	Not in support of policy regarding IPM being deleted.	7. Economic Development		Policy S13 - Innovation Park Medway			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 559	Tetlow King (Iain Warner)	Developers or Agents	Support	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 560	Tetlow King (Iain Warner)	Developers or Agents	Support	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 561	Tetlow King (Iain Warner)	Developers or Agents	Support	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 562	Tetlow King (Iain Warner)	Developers or Agents	Policy is unnecessary when Design and access statements are required.	9. Transport	9.9 User hierarchy and street design	Policy T25: User hierarchy and street design			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 563	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site RWB19 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 564	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site RN9 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 565	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site LW6, LW7, LW8 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 566	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site GN6 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			

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Email & OPUS	E.117	File B	Nightingale Homes	SDLP 567	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site FP10 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 568	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site FP6 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 569	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site CCB8, CCB20, CCB31, FP10 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 570	Tetlow King (Iain Warner)	Developers or Agents	Commentary made on site HHH25 and their ability to be delivered within the first 5 years. Together with a minimal buffer and requirements such as BNG, maintaining a 5 year housing supply is going to be difficult.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 571	Tetlow King (Iain Warner)	Developers or Agents	Comments on emerging allocations included since reg 18 against the Sustainability Appraisal - sites HW3, RN9, RN8, SNF1, SNF3, SR5, HHH22, HHH31	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email & OPUS	E.117	File B	Nightingale Homes	SDLP 572	Tetlow King (Iain Warner)	Developers or Agents	Clarification sought on calculation of household size and number of bedrooms for older people accommodation.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4882	Tetlow King (Iain Warner)	Developers or Agents	This approach to housing supply fails to make any provision for a buffer having regard to paragraphs 72 and 78 of the NPPF.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.7	An appropriate buffer needs to be considered to ensure that sufficient housing is provided for over the plan period, noting of course the council's continued failures to meet housing requirements since the adoption of the current plan	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4883	Tetlow King (Iain Warner)	Developers or Agents	The policy therefore needs redrafting to clearly delineate between the hierarchy of landscapes and protections that apply to each level.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	Revised wording in the policy to accurately reflect the NPPF approach to valued landscapes	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4884	Tetlow King (Iain Warner)	Developers or Agents	Support	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	Update the wording in relation to SuDS	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4885	Tetlow King (Iain Warner)	Developers or Agents	Update policy to reflect the NPPF - para 153	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt	Update policy drafting to reflect the NPPF- para 153	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4886	Tetlow King (Iain Warner)	Developers or Agents	Support but needs to be compliant with building regulations	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Update policy to remove those elements already governed by different legislation outside of planning	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4887	Tetlow King (Iain Warner)	Developers or Agents	Currently worded policy is not consistent with NPPF para 215. A distinction between designated and non-designated required.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	The policy needs to be revised to provide a clear differentiation between designated and non-designated heritage assets as adopted by the NPPF and avoid potentially overly restrictive controls on non-designated heritage assets that are not afforded the same protection in the NPPF.	No	
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4888	Tetlow King (Iain Warner)	Developers or Agents	Concerns expressed over the approach for PDL sites	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	Provide clarity on whether C2 extra care housing is exempt from AH requirements. Update the general policy as below: "• In high value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites, 30% of all residential units proposed. • In lower value areas, 25% of all dwellings proposed in greenfield areas. • Yes0% of all residential units proposed on previously developed land."	Yes	We have particular concerns over the approach for specialist older persons housing (extra care) and how this could be affected by requirements for AH provision that are not supported by the present
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4889	Tetlow King (Iain Warner)	Developers or Agents	Current wording of the policy does not provide certainty of delivery.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Provide greater clarification between the typologies of specialist older persons housing and specifically address the matter of whether AH is required from C2 developments.	Yes	We have grave concerns over the current approach to ensuring sufficient delivery of specialist housing for older people with such a policy
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4891	Tetlow King (Iain Warner)	Developers or Agents	Do not support the inclusion of this site allocation given it's history of refusal at appeal.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham	Removal of the site in favour of more sustainable options such as site RN2 promoted.	Yes	The evidence to support the allocation of this site, despite the relevant appeal background, is limited at best and we therefore wish to be part of the hearing session to test the justification of both the council and promoter as to how such matters are to be overcome

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Online	800	Online (OPUS)	Nightingale Homes Ltd [800]	4892	Tetlow King (Iain Warner)	Developers or Agents	Questioning land allocation change is motivated by Gravesham BC intentions.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Review whether the exceptional circumstances test has truly been met to consider the release of these sites and therefore consider alternative options to bring sites forward to meet housing requirements without the need for GB release	No	
Email	E.158	File H	Option Two Development Limited	SDLP 912	DHA (Jonathan Buckwell)	Developers or Agents	As noted, we have previously commented on the Development Framework and wish to reiterate that the SPD is a guide to development.	5. Built Environment	5.9 Star Hill to Sun Pier	Policy S9: Star Hill to Sun Pier		Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.158	File H	Option Two Development Limited	SDLP 913	DHA (Jonathan Buckwell)	Developers or Agents	No objection in principle, however the requirement for "dementia friendly standards" is not specific and is already included in Policy T4 in relation to specialist / supported housing rather than general housing design. Furthermore, Part M of Building Regulations covers accessibility. As such we suggest this be removed from the policy.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design		Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.158	File H	Option Two Development Limited	SDLP 914	DHA (Jonathan Buckwell)	Developers or Agents	As currently worded policy DM10 is too restrictive, it requires the retention of any historical and architectural features on sites, with no exceptions listed – therefore it could potentially restrict comprehensive redesign solutions on this Site and others – and restrict development so much, that it is unviable to bring forward.	5. Built Environment	5.10 Conservation areas	Policy DM10: Conservation Areas	We therefore recommend that bullet 4 of policy DM10 be amended to add the following wording in red: 'Retain historical and architectural features of the area that make a positive contribution to the character or appearance of the Conservation Area, unless there are specific circumstances that justify removal such as that: • The building/feature is beyond repair; • It is incapable of use; • Its design is inappropriate; or • The character and appearance of the Conservation Area	Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.158	File H	Option Two Development Limited	SDLP 915	DHA (Jonathan Buckwell)	Developers or Agents	No objection in principle. Bullet point 3 requires the provision of green walls/roofs – however these are not always appropriate for all forms of development. Bullet 6 is also already covered by policy S1. Delete bullet 6 Bullets 7 and 8: The submission of a Construction Management Plan at the planning application stage is difficult as not all of this information will be known yet. Furthermore, full remediation details would follow at the condition stage, following further contamination work.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	suggest the wording be amended to add the wording in red: 'the use of natural features such as green walls/roofs/hedges/roof top gardens etc where appropriate to enhance sustainability and Biodiversity Net Gain and contribute to the health and wellbeing of residents.' Delete bullet 6, 7 and 8	Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.158	File H	Option Two Development Limited	SDLP 916	DHA (Jonathan Buckwell)	Developers or Agents	The policy acknowledges that the provision of public art is subject to viability	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries	recommend that bullet point 6 be amended and add the following wording in red: major development proposals, subject to viability, must include public art or equivalent cultural contributions towards public realm or river walks that enhances the cultural offer and appearance of the development and its surroundings.	Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.158	File H	Option Two Development Limited	SDLP 917	DHA (Jonathan Buckwell)	Developers or Agents	* concerns with the suggested quantum of development and specific wording of the policy. * criterion 3c: Star Hill to Sun Pier Development Framework can be overly prescriptive * criterion 3di is too vague * criterion 4: amends suggested for flexibility.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites			
Email	E.158	File H	Option Two Development Limited	SDLP 918	DHA (Jonathan Buckwell)	Developers or Agents	Paragraph 6 is covered by policy T9	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	To avoid confusion, suggest reference to custom and self-build plots be removed from paragraph 6 and dealt with under policy T9.	Yes	Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design
Email	E.65	File L	P Sharp	SDLP 264	N/A	Members of the Public	Only 8500 houses are to be built on brownfield site which mean the remainder will be built on green, predominantly farmland. Concern over loss of agricultural and greenfield land	7. Economic Development	7.8 Rural economy			No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.65	File L	P Sharp	SDLP 265	N/A	Members of the Public	Concern over transport, particularly buses, Medway Council promises improved transport but that is beyond their remit. Unless they are funding the transport it cannot be guaranteed that a bus company will provide a route if it is found to be unprofitable. Concern also raised over congestion and increased traffic from development.	9. Transport				No	
Email	E.65	File L	P Sharp	SDLP 266	N/A	Members of the Public	Where the businesses affected on Medway City Estate would be moved to and was told this hadn't been decided. Surely this should have been discussed with those businesses before allocating the area for housing.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area			No	
Email	E.65	File L	P Sharp	SDLP 267	N/A	Members of the Public	Have the businesses currently at Chatham Docks been allocated land elsewhere?	3. Spatial Development Strategy	3.1 Overview			No	
Email	E.65	File L	P Sharp	SDLP 268	N/A	Members of the Public	Concern over infrastructure, particularly guaranteeing the water supply for all these homes and for the sewage treatment. Also no new hospital or staff to run the health services.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Email	E.146	File L	Paul Barden	SDLP 799	N/A	Members of the Public	Policy SA8 Paragraph 14.9 - No further development should occur on the Hoo Peninsula until road and rail infrastructure is improved. A Grain station is essential, and the 30% housing target for the area is inappropriate.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.146	File L	Paul Barden	SDLP 800	N/A	Members of the Public	SA4, paragraph 14.5- The plan breaks election promises by failing to protect Chatham Docks jobs and omits essential road and transport upgrades. The policy neglects employment needs, lacks integrated transport planning, and requires major road upgrades before allowing new housing development.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront			
Email	E.146	File L	Paul Barden	SDLP 801	N/A	Members of the Public	Policy SA8 Paragraph 14.9 - No further development should occur on the Hoo Peninsula until road and rail infrastructure is improved. A Grain station is essential.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.179	File M	Paul Butcher	SDLP 1156	N/A	Members of the Public	Medway's Local Plan is inconsistent in land parcel references.	4. Natural Environment					
Email	E.179	File M	Paul Butcher	SDLP 1157	N/A	Members of the Public	Duty to Cooperate is incomplete, especially with Gravesham Council with conflicting plans, outdated references, and no mutual agreement, rendering the plan unsound and lacking transparency, especially regarding water infrastructure alignment.	1. Overview	1.4 Duty to Cooperate				
Email	E.46	File L	Paul Davies	SDLP 182	N/A	Members of the Public	Queries proposals to build on greenbelt land in Strood and its effect on neighbouring areas (in the Hoo peninsula) and advocates for use of Brownfield land instead.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.46	File L	Paul Davies	SDLP 183	N/A	Members of the Public	Queries the impact on infrastructure (road, water etc.) that comes with increased homebuilding. Developments should have S106 agreements to mitigate this.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.59	File L	Paul Skues	SDLP 239	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Email	E.59	File L	Paul Skues	SDLP 240	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Email	E.59	File L	Paul Skues	SDLP 241	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Email	E.59	File L	Paul Skues	SDLP 242	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Email	E.59	File L	Paul Skues	SDLP 243	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.59	File L	Paul Skues	SDLP 244	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Email	E.59	File L	Paul Skues	SDLP 245	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.59	File L	Paul Skues	SDLP 246	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.31	File L	Paula Quirk	SDLP 92	N/A	Members of the Public	Concern over loss of open space, wildlife, air quality, increase in traffic. Suggests building houses on Gillingham Business Park.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	
Email	E.161	File H	Peel Waters	SDLP 923	P4 Planning (Alex Snow)	Developers or Agents	The Policy is currently broad and undefined. Schemes will not be delivered if not viable. Questioned transport mitigations.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.161	File H	Peel Waters	SDLP 924	P4 Planning (Alex Snow)	Developers or Agents	Support and site proposals align	1. Overview					
Email	E.161	File H	Peel Waters	SDLP 925	P4 Planning (Alex Snow)	Developers or Agents	Support and site proposals align	2. Vision and Strategic Objectives					
Email	E.161	File H	Peel Waters	SDLP 926	P4 Planning (Alex Snow)	Developers or Agents	Support and site proposals align	3. Spatial Development Strategy					
Email	E.161	File H	Peel Waters	SDLP 927	P4 Planning (Alex Snow)	Developers or Agents	Supportive of a housing mix but does not accept that this must include bungalows in high density developments.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Change to policy requirement for bungalows in high density developments.		
Email	E.161	File H	Peel Waters	SDLP 928	P4 Planning (Alex Snow)	Developers or Agents	Clarification required on percentage requirements in different locations.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Clarification required on percentage requirements in different locations.		

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.161	File H	Peel Waters	SDLP 929	P4 Planning (Alex Snow)	Developers or Agents	Agree that this should not apply to flatted developments. Clarify within the policy.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	Clarify requirement not for flatted development within policy.		
Email	E.161	File H	Peel Waters	SDLP 930	P4 Planning (Alex Snow)	Developers or Agents	Support	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries			
Email	E.161	File H	Peel Waters	SDLP 931	P4 Planning (Alex Snow)	Developers or Agents	Agrees with hierarchy of centres but suggests recognition of existing and planned centre as part of proposed development adjacent to the east and north sides of the Dock and Chatham Waters. Represent as one or two separate designations	8. Retail and Town Centres	8.14 Local and rural centres	Policy DM12: Local and rural centres	Agrees with hierarchy of centres but suggests recognition of existing and planned centre as part of proposed development adjacent to the east and north sides of the Dock and Chatham Waters. Represent as one or two separate designations		
Email	E.161	File H	Peel Waters	SDLP 932	P4 Planning (Alex Snow)	Developers or Agents	Basin 3 could support water-based leisure activities, which ties in with the leisure designation for Basins 1 and 2. Extend designation to include Basin 3.	3. Spatial Development Strategy	3.2 Policies Map	Policies map - South West	extend leisure designation on policies map to include Basin 3		
Email	E.161	File H	Peel Waters	SDLP 933	P4 Planning (Alex Snow)	Developers or Agents	Querying the principle of the Pier Road gyratory scheme proposed by the STA and the design (doesn't accommodate pedestrian and cycle movements). This gyratory was funded by Peel years ago to ensure it could accommodate the scheme proposed now via allocation SM16	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			
Email	E.161	File H	Peel Waters	SDLP 934	P4 Planning (Alex Snow)	Developers or Agents	Support.	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path			
Email	E.161	File H	Peel Waters	SDLP 935	P4 Planning (Alex Snow)	Developers or Agents	Support	9. Transport	9.3 Active travel interventions	Policy DM16: Chatham Waters line			
Email	E.161	File H	Peel Waters	SDLP 936	P4 Planning (Alex Snow)	Developers or Agents	Clarify that this does not apply to proposed site allocations for redevelopment.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure	Add: 'Unless allocated for alternative development' at the beginning of the policy.		
Email	E.161	File H	Peel Waters	SDLP 937	P4 Planning (Alex Snow)	Developers or Agents	Amend policy to be consistent with Wakenshaw & Bunn research.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Insert in paragraph preceding bullets: Strategic and major development proposals for new homes will also be planned to ensure good quality walking routes are available to bus stops and which promote enable the maximum walking distances to bus stops as part of medium to longer distance journeys which are within the following: * Core bus corridors with two or more high frequency services will require a maximum walking distance of 500 800 metres * Delete second bullet beginning : 'Single high frequency.... * Less frequent routes will require a maximum walking distance of 300 580 metres * Town/City centres will require a maximum walking distance of 250 metres.		
Email	E.161	File H	Peel Waters	SDLP 938	P4 Planning (Alex Snow)	Developers or Agents	Support the bespoke approach but suggests site by site assessment rather than minimums.	9. Transport	9.12 Parking	Policy DM19: Vehicle Parking	suggest site by site instead of minimum		
Email	E.161	File H	Peel Waters	SDLP 939	P4 Planning (Alex Snow)	Developers or Agents	Ability to achieve the minimum requirements will be challenging in higher density apartment-led schemes.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Email	E.161	File H	Peel Waters	SDLP 940	P4 Planning (Alex Snow)	Developers or Agents	Clarify policy that unless allocated for development the requirements apply, i.e. some existing waste sites will need to be released to facilitate proposed development.	12. Waste Management	12.4 Safeguarding of existing waste management facilities	Policy T34: Safeguarding of existing waste management facilities	Clarify that 'unless allocated for development' existing waste management sites need to be protected.		
Email	E.161	File H	Peel Waters	SDLP 941	P4 Planning (Alex Snow)	Developers or Agents	Clarify policy that unless allocated for development the requirements apply, i.e. some existing waste sites will need to be released to facilitate proposed development. Remove the related designation on the 'South East' policies map.	3. Spatial Development Strategy	3.2 Policies Map	Policies map - South West	Remove waste management designation from South East policies map.		
Email	E.161	File H	Peel Waters	SDLP 942	P4 Planning (Alex Snow)	Developers or Agents	* Support but replace concept plan with illustrative masterplan submitted by Peel. * Questions the benefit of exploring renovation of existing buildings (3) and its compatibility with the scale of development proposed. * 7c - amend wording to replace 'generous amount' * Para 8 recognises issues with open space provision - comment made on policy DM21 as well * Some requirements are set too early before design can take place - segregated cycle and pedestrian walkways for example * Bullet 14 - Rather than a development brief, a heritage assessment could be swifter without significant delays.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	* Support but replace concept plan with illustrative masterplan submitted by Peel. * Questions the benefit of exploring renovation of existing buildings (3) and its compatibility with the scale of development proposed. * 7c - amend wording to replace 'generous amount' with: 'network of high-quality public realm and green infrastructure.' * Bullet 14 - Rather than a development brief, a heritage assessment could be swifter without significant delays. * Bullet 20 - clarify what is meant by legal agreement		
Email	E.161	File H	Peel Waters	SDLP 943	P4 Planning (Alex Snow)	Developers or Agents	Mix of use against SM16 should be updated to include Eg(ii) and ancillary office to accord with the outline permission.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites	Amend mix of use against SM16 to include Eg(ii) and ancillary office to accord with the outline permission.		
Email	E.161	File H	Peel Waters	SDLP 944	P4 Planning (Alex Snow)	Developers or Agents	The LC18 plan should be amended to include the terrace of commercial/retail units facing the dock within Chatham Waters. Include Local Centre for planned growth through the river waterfront site allocation.	Appendix A: Local Centres, Rural Centres, Shopping Parades and Neighbourhood Centres			The LC18 plan should be amended to include the terrace of commercial/retail units facing the dock within Chatham Waters. Include Local Centre for planned growth through the river waterfront site allocation.		

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.161	File H	Peel Waters	SDLP 945	P4 Planning (Alex Snow)	Developers or Agents	Update to reflect current use class order. Bespoke approach for residential standards on brownfield sites rather than minimums. Remove minimum.	Appendix B: Parking standards			Replace minimum standards for residential on brownfield sites with bespoke.		
Email	E.161	File H	Peel Waters	SDLP 946	P4 Planning (Alex Snow)	Developers or Agents	Remove safeguarded site at Chatham Docks - it is allocated for development.	Appendix D: Safeguarded Waste Sites			Remove safeguarded waste site from Chatham Docks, which has been identified for development.		
Email	E.161	File H	Peel Waters	SDLP 947	P4 Planning (Alex Snow)	Developers or Agents	Amend land uses to Eg(ii), B2, B8 and ancillary office.	1. Overview	1.3 How the plan has been prepared	Evidence base: Land Availability Assessment	Amend land uses to Eg(ii), B2, B8 and ancillary office.		
Email	E.161	File H	Peel Waters	SDLP 948	P4 Planning (Alex Snow)	Developers or Agents	* Para 4.38 - amend floorspace to 31,000sqm * para 4.48 - Arcelor Mittal has not let two units in Jan 2020. Please remove text. * para 4.87 - clarify approval for Eg(ii) (iii), B2 and B8 with ancillary office. * para 7.6 and 7.3 refer to committed supply. Not sure what this relates to as 31,000sqm has outline permission.	1. Overview	1.3 How the plan has been prepared	Evidence base: Employment Land Needs Assessment	* Para 4.38 - amend floorspace to 31,000sqm * para 4.48 - Arcelor Mittal has not let two units in Jan 2020. Please remove text. * para 4.87 - clarify approval for Eg(ii) (iii), B2 and B8 with ancillary office. * para 7.6 and 7.3 refer to committed supply. Not sure what this relates to as 31,000sqm has outline permission.		
Email	E.161	File H	Peel Waters	SDLP 949	P4 Planning (Alex Snow)	Developers or Agents	* Table 3 figures - not sure what it relates to * Tables 5.3 and 5.4 figure of 100,000sqm is used. Unsure why this is included, i.e. This is 3 times the amount actually permitted. * Question the need for the Pier Road Gyratory proposed	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Transport Assessment			
Email	E.161	File H	Peel Waters	SDLP 950	P4 Planning (Alex Snow)	Developers or Agents	Support but query certain parts of the draft: * para4.52, para 4.73 and 4.82, para 4.89, Table 6.4, para 6.25, para 7.4, para 7.24, para 9.11, para 11.8	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment	Support but query certain parts of the draft: * para4.52, para 4.73 and 4.82, para 4.89, Table 6.4, para 6.25, para 7.4, para 7.24, para 9.11, para 11.8		
Email	E.161	File H	Peel Waters	SDLP 951	P4 Planning (Alex Snow)	Developers or Agents	Notes that Arcelor Mittal reg 18 response relies on retaining the operational port. This response fails to acknowledge that an operational port is unviable as the Victorian Gates have reached the end of their operational life and would need to be replaced at cost that would not be borne by the proposed development.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment			
Email	E.174	File M	Peter and Val Richardson	SDLP 1115	N/A	Members of the Public	Object to scale of development on Hoo Peninsula and on farmland.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.13	File L	Peter Lowe	SDLP 32	N/A	Members of the Public	Consider the Local Plan to be unsound on the basis that its rejection of Site SR22 fails the tests of justification, effectiveness and consistency with National Policy. In addition, the site offers a logical opportunity for low-impact self-build housing, in line with Policy T9, but this is not reflected in the spatial strategy or site allocation decisions. The representation does not allege a failure of legal compliance or breach of the duty to co-operate. However, if the continued exclusion of well-evidenced and locally supported small sites persists, it may raise broader concerns about whether the Plan has been positively prepared and justified across all rural areas. Request that Site SR22 be reconsidered for allocation or as a windfall site under Policy T9. A modification to this effect is necessary to ensure the Plan is legally compliant, positively prepared,	6. Housing	6.9 Self-build and custom housebuilding	PolicyT9: Self-build and Custom Housebuilding (Site SR22)	Request that Site SR22 be reconsidered for allocation or as a windfall site under Policy T9.		
Email	E.13	File L	Peter Lowe	SDLP 33	N/A	Members of the Public	Amend Policy T9 to explicitly support small-scale windfall proposals (1–3 units) where sites are well-located, sustainably accessible, and can demonstrate a clear link to the Register's locational preferences.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	Amend Policy T9 to explicitly support small-scale windfall proposals (1–3 units) where sites are well-located, sustainably accessible, and can demonstrate a clear link to the Register's locational preferences.		
Email	E.13	File L	Peter Lowe	SDLP 34	N/A	Members of the Public	Acknowledge the role of Permission in Principle (PiP) as a proportionate route for enabling such self-build schemes, especially in rural edge settings not designated or protected for their environmental value. This aligns with national policy encouraging diverse routes to housing delivery and local empowerment.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	Acknowledge the role of Permission in Principle (PiP) as a proportionate route for enabling such self-build schemes, especially in rural edge settings not designated or protected for their environmental value.		
Email	E.13	File L	Peter Lowe	SDLP 35	N/A	Members of the Public	Ensure the supporting text and monitoring framework allow for the delivery of small-scale PiP-led self-build plots to count towards meeting identified demand under the Housing and Planning Act 2016 and associated Self-Build legislation.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	Medway Council will support small-scale self-build and custom housebuilding proposals outside settlement boundaries, including through Permission in Principle, where they respond to local need, are well-designed, and make use of underutilised or degraded land at the rural edge. This approach reflects national policy support for community-led, context-sensitive housing in rural		
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1797	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1798	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1799	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1800	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1801	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1802	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1803	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.53	File Q	Peter Richardson	SDLP 1804	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.103	File L	Philip Badman	SDLP 353	N/A	Members of the Public	Concern that community needs are not prioritised, leading to lost amenities like playing fields and surgeries.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.103	File L	Philip Badman	SDLP 354	N/A	Members of the Public	Risk of cross-border housing developments along the A228, which would worsen traffic congestion and damage heritage landscapes.	9. Transport	9.11 Transport assessments, transport statements and travel plans	Policy DM18: Transport assessments, transport statements and travel plans			
Email	E.103	File L	Philip Badman	SDLP 355	N/A	Members of the Public	Concern that developers often fail to honour commitments, highlighting the need for stronger enforcement and accountability in planning approvals. Concern that high rents block relocation, and weak enforcement allows repeated failures	1. Overview					
Email	E.42	File B	Port Medway Marina	SDLP 136	Peter Court Associates (Peter Court)	Developers or Agents	CHR14 - confirming plans for completion in shorter term and highlighting commercial development inclusion.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements			
Email	E.42	File B	Port Medway Marina	SDLP 137	Peter Court Associates (Peter Court)	Developers or Agents	Support for policy - but also highlighting importance of smaller commercial sites.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Email	E.42	File B	Port Medway Marina	SDLP 138	Peter Court Associates (Peter Court)	Developers or Agents	Request for need to understand and support development proposals that will generate employment and economic development.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision			
Email	E.42	File B	Port Medway Marina	SDLP 139	Peter Court Associates (Peter Court)	Developers or Agents	Support for policy - noting development of rural and marine based tourism is important.	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Policy T13: Tourism, culture and visitor accommodation			
Email	E.42	File B	Port Medway Marina	SDLP 140	Peter Court Associates (Peter Court)	Developers or Agents	Support for policy - site supports rural economy.	7. Economic Development	7.8 Rural economy	Policy T14: Rural Economy			
Email	E.42	File B	Port Medway Marina	SDLP 141	Peter Court Associates (Peter Court)	Developers or Agents	Clients site is able to facilitate the provision of a cycle and footpath linking the Park from Strood to Port Medway Marina, Cuxton and to Maidstone and Sevenoaks as part of National Cycle Network	8. Retail and Town Centres	8.17 Medway Valley Leisure Park	Policy DM13 Medway Valley Leisure Park			
Email	E.42	File B	Port Medway Marina	SDLP 142	Peter Court Associates (Peter Court)	Developers or Agents	Request for flexibility of mix - not all sites can provide full mix.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Requesting policy includes flexibility within mix.		
Email	E.42	File B	Port Medway Marina	SDLP 143	Peter Court Associates (Peter Court)	Developers or Agents	Policy scope should include boatyards and drydocks.	9. Transport	9.6 Marinas and moorings	Policy T22: Marinas and moorings	Include boatyards and drydocks		
Email	E.42	File B	Port Medway Marina	SDLP 144	Peter Court Associates (Peter Court)	Developers or Agents	Request for flexibility of mix in relation to affordable, difficulty of finding a housing association to take on site.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Policy reword - 'affordable housing will be sought on sites of 10 units or over rather than be required		
Email	E.42	File B	Port Medway Marina	SDLP 145	Peter Court Associates (Peter Court)	Developers or Agents	River infrastructure should not impact existing businesses or have unreasonable restrictions imposed.	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure			
Email	E.42	File B	Port Medway Marina	SDLP 146	Peter Court Associates (Peter Court)	Developers or Agents	Flexibility requested - on site by site basis.	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			
Email	E.42	File B	Port Medway Marina	SDLP 147	Peter Court Associates (Peter Court)	Developers or Agents	Flexibility requested - 10+ units contributing to community facilities is matter of viability particularly for brownfield. Need site by site consideration	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities			
Email	E.61	File U	Port of London Authority	SDLP 253	N/A	Statutory Bodies	Supports the proposed changes including reference to the need for development proposals to include riparian lifesaving equipment and appropriate suicide prevention measures where necessary	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path		No	
Email	E.61	File U	Port of London Authority	SDLP 254	N/A	Statutory Bodies	Support inclusion of text regarding unreasonable restrictions	9. Transport	9.5 Riverside infrastructure	Policy T21: Riverside infrastructure		No	
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1388	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1389	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1390	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				

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Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1391	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1392	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1393	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1394	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1395	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hard copy	H.8	File N	Professor Anan Shetty	SDLP 1396	N/A	Members of the Public	Concern over lack of healthcare infrastructure and suggests a dedicated elective surgery NHS facility in Medway to ease pressure on emergency services, reduce waiting times, and improve outcomes.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.173	File V	Pump Lane Steering Group	SDLP 1114	N/A	Voluntary and Community Organisations	Urges that Policy S25: Energy Supply to be aligned more closely with the adaptation objective through similar strengthening.	13. Energy					
Email	E.197	File M	Rachael Selleck	SDLP 1290	N/A	Members of the Public	Concern about overcrowding, environmental harm, and poor infrastructure planning. Stress the need for prioritizing community needs over unchecked development. More thoughtful, sustainable approach to future planning in Allhallows and surrounding areas	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Online	29	Online (OPUS)	Raifuture Ltd (Mr Roger Blake, Director, Infrastructure & Networks) (29)	4944	N/A	Business	Suggested reference update to be made to reference to rail study.	9. Transport	9.4 Grain Branch	Paragraph 9.4.2	At reference to 'Network Rail's Kent Route Study' consider referencing 'North & East Kent Connectivity Modular Strategic Study of Spring' 2023.		
Online	29	Online (OPUS)	Raifuture Ltd (Mr Roger Blake, Director, Infrastructure & Networks) (29)	4945	N/A	Business	Support.	9. Transport	9.4 Grain branch	Policy DM17: Grain Branch			
Online	29	Online (OPUS)	Raifuture Ltd (Mr Roger Blake, Director, Infrastructure & Networks) (29)	4946	N/A	Business	Repeat of Rep 4944	9. Transport	9.4 Grain Branch	Paragraph 9.4.7			
Email	E.30	File L	Rebecca Meade	SDLP 90	N/A	Members of the Public	Support for co-operative housing .	6. Housing					
Email	E.30	File L	Rebecca Meade	SDLP 91	N/A	Members of the Public	Reference to removing old shops at edge of high streets and replacing with housing	8. Retail and Town Centres					
Email	E.171	File J	Redrow Homes Limited	SDLP 1080	Marrons (Roland Brass)	Developers or Agents	We recommend that this text is re-worded to reflect actual position because the Neighbourhood Plan was withdrawn in 2022 and Local Housing Needs survey has not been published. At the time of writing, no Neighbourhood Plan documents have been published since it was withdrawn.	14. Site Allocations	14.10 High Halstow	Paragraph 14.10.2	We recommend that this text is re-worded to reflect actual position because the Neighbourhood Plan was withdrawn in 2022 and Local Housing Needs survey has not been published. At the time of writing, no Neighbourhood Plan documents have been published since it was withdrawn.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1081	Marrons (Roland Brass)	Developers or Agents	We support this reference and confirm that Site 1 is for 760 homes (Redrow) and Site 2 is for 60 homes (Dean Lewis Estates).	14. Site Allocations	14.13 Other Sites	Paragraph 14.10.3		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.

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Email	E.171	File J	Redrow Homes Limited	SDLP 1082	Marrons (Roland Brass)	Developers or Agents	We recommend wording is updated to reflect the proposed development for the Site. Suggested wording: providing approximately 820 new homes, land for a new primary school, attractive multi-functional green infrastructure and an additional local centre providing commercial and community services.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (Objective, bullet 1)	Suggested wording: providing approximately 820 new homes, land for a new primary school, attractive multi-functional green infrastructure and an additional local centre providing commercial and community services.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1083	Marrons (Roland Brass)	Developers or Agents	Recommend that the Council reviews "masterplan" references as Point 2 could be combined with "Subsequent design principles" . This policy criteria should recognise that development (at both sites under SA9) will come forward in a comprehensive manner. This approach would make the policy wording clearer especially because no masterplan is included in the Reg 19 Local Plan.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (bullet 2)		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1084	Marrons (Roland Brass)	Developers or Agents	Given the site allocation (defined on the Proposals Map) future development would not lead to coalescence with any settlements. There is a large gap (including physical features e.g. Peninsula Way, railway line) between the Site / High Halstow and any other settlements or allocations. Any proposals on Site would respect landscape character and include significant landscaping (on site). As a result we recommend the Council reviews wording at point 4.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (bullet 4)		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1085	Marrons (Roland Brass)	Developers or Agents	Comment that Neighbourhood Plan was withdrawn in 2022 and Local Housing Needs survey has not been published.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (bullet 6)		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1086	Marrons (Roland Brass)	Developers or Agents	Recommend wording is updated to reflect way in which developer contributions will be made.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (bullet 12)	Suggested wording: "The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute proportionately to the delivery of highways mitigations to provide capacity to accommodate growth at..."	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1087	Marrons (Roland Brass)	Developers or Agents	We support the Council's view on land uses and delivery over the plan period. We suggest that number of new homes are referenced as "approximate" figures, not up to figures.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow (HHH26, HHH29)	We suggest that number of new homes are referenced as "approximate" figures, not up to figures.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.

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Email	E.171	File J	Redrow Homes Limited	SDLP 1088	Marrons (Roland Brass)	Developers or Agents	We support the Reg 19 Local Plan Policies Map as the Site (draft Policy SA9 site allocation) is shown in full on the "North West" map	3. Spatial Development Strategy	3.2 Policies Map	Policies Map - North West		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1089	Marrons (Roland Brass)	Developers or Agents	HHH26 -Recommend that the site information is updated to accurately present the planning status of the Site. For example, the hybrid planning application was submitted at the end of March 2023. The description of development has also changed over the determination period.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Housing Land Availability Assessment		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1090	Marrons (Roland Brass)	Developers or Agents	It is important for the Council to recognise that the planning application at the Site will enable the delivery of the primary school (as the applicant will provide the land for the new primary school). There are no other references to infrastructure provision at High Halstow in the IDP.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1091	Marrons (Roland Brass)	Developers or Agents	It is positive that the Council has prepared a Duty to Cooperate Statement however, it needs to be advanced for Local Plan submission. We recommend relevant discussions (with neighbouring LPAs and other relevant parties) are fully documented and evidenced for Local Plan submission.	1. Overview	1.4 Duty to Cooperate			Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested
Email	E.171	File J	Redrow Homes Limited	SDLP 1092	Marrons (Roland Brass)	Developers or Agents	We support the vision and strategic objectives set out in the Reg 19 Local Plan, especially in relation to growth at the Hoo Peninsula and that the Council aims to meet its housing and economic needs in full.	2. Vision and Strategic Objectives				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1093	Marrons (Roland Brass)	Developers or Agents	Recommend that the full evidence base is updated and finalised for Local Plan submission. In particular, further information on the delivery strategy and funding mechanisms for projects set out in the IDP is essential. We welcome the opportunity to further engage with the Council.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.

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Email	E.171	File J	Redrow Homes Limited	SDLP 1094	Marrons (Roland Brass)	Developers or Agents	Recommend that the full evidence base is updated and finalised for Local Plan submission. In particular, further information on the delivery strategy and funding mechanisms for projects set out in the Viability Appraisal is essential. We welcome the opportunity to further engage with the Council.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1095	Marrons (Roland Brass)	Developers or Agents	We support the identification of the Hoo Peninsula, specifically the settlements of Hoo St Werburgh, Chattenden and High Halstow, as a location to deliver around 30% of housing needs during the Plan period.	3. Spatial Development Strategy				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1096	Marrons (Roland Brass)	Developers or Agents	Recommend that a new policy is added to the Local Plan which sets out the Council's housing target and explains how it will be delivered over the Plan period. As part of this, we recommend a housing trajectory is clearly set out in the Local Plan. Currently, the SHLAA contains a site-specific trajectory however this should be simplified for the Local Plan and this trajectory would also assist the final production of evidence base material, such as the IDP.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Strategic Housing Land Availability Assessment	Recommend that a new policy is added to the Local Plan which sets out the Council's housing target and explains how it will be delivered over the Plan period. As part of this, we recommend a housing trajectory is clearly set out in the Local Plan.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1097	Marrons (Roland Brass)	Developers or Agents	Recommend that a new policy is added to the Local Plan which sets out the Council's housing target and explains how it will be delivered over the Plan period. As part of this, we recommend a housing trajectory is clearly set out in the Local Plan. Currently, the SHLAA contains a site-specific trajectory however this should be simplified for the Local Plan and this trajectory would also assist the final production of evidence base material, such as the IDP.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan	Recommend that a new policy is added to the Local Plan which sets out the Council's housing target and explains how it will be delivered over the Plan period. As part of this, we recommend a housing trajectory is clearly set out in the Local Plan.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1098	Marrons (Roland Brass)	Developers or Agents	We support draft Policy S1: Planning for Climate Change	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1099	Marrons (Roland Brass)	Developers or Agents	Support draft Policy S2: Conservation and Enhancement of the Natural Environment but further information on the 'SEP' is required for the submission Local Plan. Currently there is missing information on the funding mechanism and scale/apportionment of contributions and the cost does not appear to have been considered in the Viability Appraisal. Also support the biodiversity net gain target of 10% which is in accordance with the statutory requirement	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.

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Email	E.171	File J	Redrow Homes Limited	SDLP 1100	Marrons (Roland Brass)	Developers or Agents	Support Draft Policy DM3: Air Quality and the planning application at the site promotes sustainable travel, including walking and cycling to reduce reliance on the private car.	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1101	Marrons (Roland Brass)	Developers or Agents	We support draft policies on the built environment.	5. Built Environment				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1102	Marrons (Roland Brass)	Developers or Agents	In response to T3, we are committed to the delivery of mixed and balanced communities. It is important for the Council to recognise that a key consideration for development of the strategic sites (on the Hoo Peninsula) will be balancing infrastructure delivery and contributions to support sustainable growth against development viability. As a result, we recommend the S106 assumptions (per plot on Hoo Peninsula strategic sites) from the Viability Appraisal are refined because they are based on cost estimates (presented as a range) in the IDP.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Recommend the S106 assumptions (per plot on Hoo Peninsula strategic sites) from the Viability Appraisal are refined because they are based on cost estimates (presented as a range) in the IDP.	Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1103	Marrons (Roland Brass)	Developers or Agents	We recommend flexibility is required in relation to the level of provision, servicing of the plots and relationship to affordable housing provision.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1104	Marrons (Roland Brass)	Developers or Agents	We support draft policies on economic development	7. Economic Development				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1105	Marrons (Roland Brass)	Developers or Agents	We support the general approach to transport in the Reg 19 Local Plan. We recommend that the Council review and accurately costs highways improvements to ensure that the Local Plan is deliverable and sound.	9. Transport				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.

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Email	E.171	File J	Redrow Homes Limited	SDLP 1106	Marrons (Roland Brass)	Developers or Agents	Recommend that the Council reviews the policy to ensure that there is no double counting in relation to provision of abilities and contributions.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1107	Marrons (Roland Brass)	Developers or Agents	Recommend that the costs set out in the IDP are reviewed and refined to help provide more certainty to developers and enable a more accurate understanding of future S106 contributions. We recommend that the Council appoints its own cost consultant to review the IDP to ensure that the figures are accurate and the Local Plan is deliverable, and provide greater developer confidence and certainty.	1. Overview	1.3 How the plan has been prepared	Evidence base: Infrastructure Delivery Plan		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1108	Marrons (Roland Brass)	Developers or Agents	We support draft policies on minerals supply.	11. Minerals Supply				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1109	Marrons (Roland Brass)	Developers or Agents	We support draft policies on waste management.	12. Waste Management				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1110	Marrons (Roland Brass)	Developers or Agents	Recommendation in relation to draft Policy T41 relates to the need for the Council to provide more information on the potential for heat networks. At this stage it is challenging to understand whether this policy is relevant to future development at High Halstow.	13. Energy				Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Email	E.171	File J	Redrow Homes Limited	SDLP 1111	Marrons (Roland Brass)	Developers or Agents	Important for the Council to recognise that the planning application at the site (HHH26) will enable the delivery of the primary school (as the applicant will provide the land for the new primary school). There are no other references to infrastructure provision at High Halstow in the IDP	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan		Yes	To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.
Hard copy	H.61	File S	Reform UK	SDLP 1861	N/A	MPs, Members and Parish Councils	Top-down housing targets – impact on infrastructure. Infrastructure – strain, inadequate.	10. Health, communities and Infrastructure					

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Hard copy	H.61	File S	Reform UK	SDLP 1862	N/A	MPs, Members and Parish Councils	Over development of rural, suburban areas – Hoo Peninsula.	3. Spatial Development Strategy	3.1 Overview				
Hard copy	H.61	File S	Reform UK	SDLP 1863	N/A	MPs, Members and Parish Councils	Environmental – no meaning mechanisms for protecting natural environment.	4. Natural Environment					
Hard copy	H.61	File S	Reform UK	SDLP 1864	N/A	MPs, Members and Parish Councils	Lack of transparency & public consultation – LP has been rushed, consultation period too short, locals have no voice to raise concerns.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.61	File S	Reform UK	SDLP 1865	N/A	MPs, Members and Parish Councils	Cross border issues – neighbouring LPA proposals risk overwhelming infrastructure demands.	1. Overview	1.4 Duty to Cooperate				
Hard copy	H.61	File S	Reform UK	SDLP 1866	N/A	MPs, Members and Parish Councils	Housing allocations – reserve housing for local people.	14. Site Allocations					
Hard copy	H.61	File S	Reform UK	SDLP 1867	N/A	MPs, Members and Parish Councils	Infrastructure – urgent need for expanded healthcare provision. Need robust public transport and infrastructure updates. Risk to environment.	10. Health, communities and Infrastructure					
Hard copy	H.6	File N	Rehman Chishti	SDLP 1376	N/A	Members of the Public	Need to protect green spaces and opposes 750 housing proposal in Rainham Orchards as local infrastructure cannot support this level of development	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Hard copy	H.6	File N	Rehman Chishti	SDLP 1377	N/A	Members of the Public	Object to proposal to build 4000 homes on Capstone Valley with concerns over impact on green spaces and overall environmental impact with inadequate infrastructure in place to support the proposal.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Hard copy	H.6	File N	Rehman Chishti	SDLP 1378	N/A	Members of the Public	Gillingham & Rainham need worship spaces, a Hindu temple site, and a new stadium for Gillingham FC's football ambitions.	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities			
Hard copy	H.6	File N	Rehman Chishti	SDLP 1379	N/A	Members of the Public	Medway Council's draft local plan overlooks healthcare needs. Urges for a new hospital site to be included in the Local Plan, citing population growth and insufficient existing medical facilities in Medway.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email & OPUS	E.199	File M	Richard Bellingham	SDLP 1292	N/A	Members of the Public	The Plan's lack of quantifiable provision for improvement and expansion to essential public services, particular healthcare and hospital capacity.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email & OPUS	E.199	File M	Richard Bellingham	SDLP 1293	N/A	Members of the Public	Object to the proposed redesignation of the Greenbelt land , West of Strood (policy SA6) and the general extensive use of high grade arable land for housing on the Hoo Peninsula.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West			
Email	E.142	File L	Richard Gransden	SDLP 769	N/A	Members of the Public	Concern of scale of development with lack of infrastructure	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.142	File L	Richard Gransden	SDLP 770	N/A	Members of the Public	Redevelopment of Chatham Docks for housing risks significant job loss and erodes Medway's maritime and industrial identity.	7. Economic Development					
Email	E.142	File L	Richard Gransden	SDLP 771	N/A	Members of the Public	Concern over green belt encroachment north of Strood and the impact on environment and agricultural land.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.170	File I	Richborough	SDLP 1065	Pinnacle (Jenny Fryer)	Developers or Agents	The Local Plan is not based on up to date information. Assessment of site SR17 through the Sustainability Appraisal is incorrect.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.12	To ensure the Local Plan is sound, additional evidence base documents must be prepared to justify the allocation of some of the larger strategic sites that have scored less favourably than the omitted sites within the Sustainability Appraisal.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1066	Pinnacle (Jenny Fryer)	Developers or Agents	The plan period too short and not positively prepared against NPPF. The Local Plan is not positively prepared as the supporting evidence base document, the Local Housing Needs Assessment, establishes need based on a 17 year plan period starting in 2024. It is imperative that the supporting evidence base and the emerging Local Plan are prepared with the same plan period stated as this effects housing and economic projections, land supply and housing needs.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.4	Richborough consider it necessary for the Plan Period to be extended to 2043 and for the LHNA to cover the same plan period as the emerging Local Plan to ensure consistency with national policy.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.

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Email	E.170	File I	Richborough	SDLP 1067	Pinnacle (Jenny Fryer)	Developers or Agents	Insufficient land supply, no buffer. Mods – 20% buffer, reduce windfall and meet unmet needs of 2000.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.6	The Local Plan housing supply should be increased to reflect a 20% buffer and include reserve sites to ensure maximum flexibility in the delivery of new homes. Land should be identified for 2,000 homes to meet Gravesham Borough Council's unmet needs until it has been established that this is not required. Richborough consider it necessary for the windfall allowance to be reduced significantly as it currently reflects completions data from a 10 year period without an up to date Local Plan. At the very least to 103 dpa to reflect the removal of the anomalous completions figure within the 2023/24 monitoring year. The Local Plan must also allocate a sufficient number of small sites to support SME housebuilders and ensure compliance with paragraph 73a of the NPPF.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1068	Pinnacle (Jenny Fryer)	Developers or Agents	DTC with GBC and T&M . Richborough is of the view that there is insufficient evidence that meaningful cooperation has taken place with neighbouring authorities and therefore the Local Plan is not positively prepared of justified. Mods - need SoCG	1. Overview	1.4 Duty to Cooperate	Paragraph 1.4.3	The Local Plan must be supported by completed SoCG's with neighbouring authorities. Richborough also considers it effective plan making for the emerging Local Plan to accommodate the requested 2,000 home requirement of Gravesham until it has been agreed that there is no unmet need.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1069	Pinnacle (Jenny Fryer)	Developers or Agents	(Strategic objective 2: Supporting people to lead healthy lives....) – objective needed for housing needs met in full	2. Vision and Strategic Objectives	2.2 Strategic objectives	Paragraph 2.2.1	Richborough is of the view that the inclusion of this Objective alone is not fit for purpose and a new Objective should be provided to explicitly state that the full range of need for new housing should be met and integrate a focus on deliverability.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1070	Pinnacle (Jenny Fryer)	Developers or Agents	(Spatial Development Strategy) – gaps in key evidence base documents – IDP. Adjust strategy or delay until infrastructure projects are identified and funded.	3. Spatial Development Strategy	3.1 Overview	Paragraph 3.1.1.	Richborough recommend delaying the submission of the Local Plan until the mitigation details are available and when a cogent funding strategy is identified to address the funding gap for key infrastructure projects. Alternatively, the Council should revise the spatial strategy of allocations to ensure a more dispersed approach that does not put such significant strain on specific areas of the highway network and junctions.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1071	Pinnacle (Jenny Fryer)	Developers or Agents	Review of Green Belt boundaries is not justified. Exceptional circumstances have not been demonstrated.	4. Natural Environment	4.12 Green Belt	Paragraph 4.12.4		Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.

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Email	E.170	File I	Richborough	SDLP 1072	Pinnacle (Jenny Fryer)	Developers or Agents	Need a higher housing figure than the std minimum.	6. Housing	6.1 Introduction	Paragraph 6.1.2	Richborough is of the view that the minimum Standard Method figure should be used as a starting point for establishing the housing requirement and that an uplift should be considered due to the poor levels of previous housing delivery in Medway. Richborough also consider there to be a need for a housing policy that clearly states the housing requirement and housing delivery expectations over the plan period, and that this should be expressed as a minimum figure.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1073	Pinnacle (Jenny Fryer)	Developers or Agents	No evidence to support the policy	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Richborough considers the Local Plan land supply to be too heavily reliant on brownfield urban locations. Richborough deems it necessary for additional residential sites to be allocated in the emerging Local Plan. The sites should be able to accommodate a range of housing typologies and sizes to meet the full range of needs as identified in the LHNA.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1074	Pinnacle (Jenny Fryer)	Developers or Agents	Insufficient evidence to demonstrate that Affordable housing needs will be met.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Richborough contends that the Local Plan is not sound as the land supply is not able to meet evidenced affordable housing needs. Richborough suggests reducing the reliance on brownfield sites in the Local Plan land supply by allocating additional residential land in higher value areas that can deliver the much needed affordable housing. Policy T3 should also be amended in line with national guidance and should require only rural exception sites to remain as affordable housing in perpetuity.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1075	Pinnacle (Jenny Fryer)	Developers or Agents	Does not consider that delivery of 4197 new homes suitable for students and older residents will be effective due to historic delivery rates and available evidence.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	Richborough consider it necessary for additional allocations to be found to improve the flexibility of the Local Plan supply and ensure any delay or failure to deliver an allocation will not result in a shortfall against the minimum housing requirement.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1076	Pinnacle (Jenny Fryer)	Developers or Agents	Not suitable for development and concern about highway impacts. Richborough does not consider this policy to be sound as it is not justified or compliant with the NPPF. Richborough also questions the ability to deliver the scale of development shown at Capstone Valley when considering the designated ecological assets, undulating topography, landscape designations and locally important areas of open space in the nearby area.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley	Alternative allocations should be found to reduce the impact on these protected landscape and ecological designations.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.

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Email	E.170	File I	Richborough	SDLP 1077	Pinnacle (Jenny Fryer)	Developers or Agents	Not sound as no evidence that the highway infrastructure can be delivered of that the ecological impacts of the proposed development have been justified.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Further information is required to demonstrate that the proposed highway mitigation listed in the policy has been adequately designed and costed. The Infrastructure Delivery Plan identifies these mitigation measures as critical. The financial contributions associated with new development at Hoo St Werburgh and Chattenden is exceptionally high and the cost per dwelling is between 36% and 76% higher than elsewhere in the Borough. Richborough considers the area to be suitable for a significantly smaller amount of development and that the critical mitigation to the four elms roundabout should be delivered prior to further allocations being made.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1078	Pinnacle (Jenny Fryer)	Developers or Agents	Policy SA12 includes 23 allocations that do not fall within the Local Plan's spatial strategy and contribute 881 dwellings to the Local Plan housing land supply. Include SR17	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites	Richborough consider Site SR17: land at Lower Rochester Road should be allocated for residential development as part of this Local Plan as it is sustainably located and outside the Green Belt and the live application onsite has demonstrated the range of benefits that can be afforded to the area that will also help meet the needs of existing residents.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.170	File I	Richborough	SDLP 1079	Pinnacle (Jenny Fryer)	Developers or Agents	Does not consider Policy T4 sound as it is not positively prepared in respect of meeting the accommodation needs for older people. The policy wording is not supportive of delivery and places an expectation on developers to prove the need.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Richborough considers it necessary for the first bullet point to be removed completely and the introductory paragraph rephrased to ensure there is support for all types of specialist accommodation for the elderly.	Yes	Richborough have a strong track record of promoting sites through the local plan system and believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally at the hearing sessions.
Email	E.175	File M	RM Gollay	SDLP 1116	N/A	Members of the Public	Development ignores inadequate infrastructure, flooding risk, narrow roads, overloaded schools, and healthcare, and will increase pollution and traffic.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.175	File M	RM Gollay	SDLP 1117	N/A	Members of the Public	Opposes housing in Capstone Valley and advocates for preserving farmland, biodiversity, AONB access, and vistas.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Email	E.175	File M	RM Gollay	SDLP 1118	N/A	Members of the Public	Opposes development on agricultural land as it supports wildlife and public access; proposals would be unaffordable, unsound, and harmful to residents.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.189	File M	Rob Gilbert	SDLP 1246	N/A	Members of the Public	Concern over lack of infrastructure.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.189	File M	Rob Gilbert	SDLP 1247	N/A	Members of the Public	Concern over destruction of farm land.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment				
Email & OPUS	E.56	File L	Rob Sibley	SDLP 234	N/A	Members of the Public	Medway Council has carried out extensive consultation and residents have had ample opportunity for comment. Medway needs a Local Plan and this should be progressed with all speed.	1. Overview				No	
Email	E.25	File L	Robert Wells	SDLP 75	N/A	Members of the Public	The Local Plan is not legally compliant or sound - inadequate evidence of meaningful engagement at Reg 18 and insufficient regard paid to community representations in the Reg 19 draft	1. Overview	1.3 How the plan has been prepared				
Email	E.25	File L	Robert Wells	SDLP 76	N/A	Members of the Public	Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31) and Hoo NP	1. Overview	1.3 How the plan has been prepared				
Email	E.25	File L	Robert Wells	SDLP 77	N/A	Members of the Public	Insufficient Integration of HRA. HRA is flawed in its methodology and fails to correctly apply the precautionary principle.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Habitats Regulation Assessment			
Email	E.25	File L	Robert Wells	SDLP 78	N/A	Members of the Public	Insufficient Integration of SEA. SA fails to legally satisfy the SEA Directive.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			

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Email	E.25	File L	Robert Wells	SDLP 79	N/A	Members of the Public	Lack of Evidence for Infrastructure Delivery and Monitoring. The IDP and monitoring framework are vague and legally inadequate, contrary to Reg 19 and NPPF para 35.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Email	E.25	File L	Robert Wells	SDLP 80	N/A	Members of the Public	The Local Plan does not minimise development allocations on the Hoo Peninsula and maximise development allocations in the urban area. This is crucial in order to reduce impacts on the Hoo Peninsula's habitats and wildlife.	14. Site Allocations					
Email	E.25	File L	Robert Wells	SDLP 81	N/A	Members of the Public	Lack of Evidence for Infrastructure Delivery and Monitoring. The IDP and monitoring framework are vague and legally inadequate, contrary to Reg 19 and NPPF para 35.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.139	File L	Robin Watkins	SDLP 765	N/A	Members of the Public	Development must ensure proper public spaces and overall infrastructure (transport network) within the scheme.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.139	File L	Robin Watkins	SDLP 766	N/A	Members of the Public	Insufficient evidence to conclude that green space between Hempstead and Maidstone BC boundary is suitable for development. A green lung would be more suitable for the health of residents especially factoring Lidsing.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure			
Hard copy	H.63	File V	Rochester Eco-Hub	SDLP 1869	N/A	Voluntary and Community Organisations	Rochester Eco-Hub urges sustainable, inclusive planning aligned with NPPF and UN goals and stress legal compliance.	1. Overview	1.1 Introduction				
Hard copy	H.63	File V	Rochester Eco-Hub	SDLP 1870	N/A	Voluntary and Community Organisations	Urge climate adaptation, brownfield development, and protecting biodiversity. Asks that plan seeks further environmental protection.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Hard copy	H.63	File V	Rochester Eco-Hub	SDLP 1871	N/A	Voluntary and Community Organisations	No development on agricultural land should be permitted. Food security, and community wellbeing across Medway should be protected.	4. Natural Environment	4.5 Landscape protection and enhancement				
Hard copy	H.63	File V	Rochester Eco-Hub	SDLP 1872	N/A	Voluntary and Community Organisations	The Local Plan must address infrastructure (including transport). The local plan should impose 'Gramplan conditions' on developers and specify pre-requisites before development can proceed.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.17	File L	Roger Backway	SDLP 44	N/A	Members of the Public	Object to redevelopment of Medway City Estate, and loss of employment land. Medway City Estate Vision' concept plan in 2010 is out of date. Concern also raised this will increase congestion and traffic. Suggested other smaller sites be considered for housing instead.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	The site (SA13) should be mixed use, preserving the employment sites and especially the Scotline and Transit wharfs for commercial shipping whilst at the same time opening up some of the riverside where possible for river walks. That should be possible without forcing industry out. The river is a thriving commercial port – some of us find that more attractive than yet more housing in the wrong place.	No	
Email	E.108	File L	Ron Sands and Dawn Waller	SDLP 467	N/A	Members of the Public	Infrastructure isn't in place to handle anticipated housing (schools, roads, healthcare and transport, congestion/pollution). The plan doesn't safeguard community identity.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.108	File L	Ron Sands and Dawn Waller	SDLP 468	N/A	Members of the Public	Object to the Medway Local Plan 2041 as it promotes unsustainable development in Hoo St Werburgh and on the Peninsula. Threatens the environment (proposes oues in protected habitats SSSIs, SPAs and Ramsar sites) and integrity of local communities.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4570	N/A	Voluntary and Community Organisations	Supports the vision, its overarching aims to enhance biodiversity and restoring nature in line with Local Nature Recovery Strategy. Requests prioritising less harmful locations over sites located close to important areas for biodiversity and where impacts cannot be avoided.	2. Vision and Strategic Objectives	2.1 Vision	Vision for Medway in 2041			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4571	N/A	Voluntary and Community Organisations	Supports that the Council policy embraces the Local Nature Recovery Strategy, as an important evidence base.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Paragraph 4.3.2			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4572	N/A	Voluntary and Community Organisations	Suggested an amendment to para 4.4.8, insert "some" in '. It is recognised that <u>some</u> areas in proximity to the designations have a role as functionally linked land, such as feeding areas for wildlife. Such areas will also need to be considered in assessing potential for damaging impacts resulting from development."	4. Natural Environment	4.4. Sites of international importance for nature conservation	Paragraph 4.4.8	Suggested an amendment to para 4.4.8, insert "some" in: 'It is recognised that some areas in proximity to the designations have a role as functionally linked land, such as feeding areas for wildlife. Such areas will also need to be considered in assessing potential for damaging impacts resulting from development."		
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4573	N/A	Voluntary and Community Organisations	Support the Council in looking to incorporate the LNRS guidance following publication of the Kent and Medway Local Nature Recovery Strategy.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Paragraph 4.6.4			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4574	N/A	Voluntary and Community Organisations	Supports Medway's efforts to connect ecologically important sites. Suggest the corridors be given a status to appropriately create, restore and maintain them in practice. Pursuing the policy should ensure directing access away from ecologically sensitive sites and functionally linked land where disturbance may impact wildlife and include awareness of important sites for declining farmland birds. Suggests reviewing Kent Ornithological Society maps identifying core areas of farmland birds in Medway. Recommend these areas and potential corridor around Lodge Hill SSSI (in Figure 2 map) be factored into ecological corridors as a priority. Suggest Medway works with ourselves, KOS and other NGOs to help inform this work and further strategy refinements.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Suggest the ecological corridors be given a status to appropriately create, restore and maintain them in practice. Recommend the core areas of farmland bird around Medway and potential corridor around Lodge Hill SSSI (in Figure 2 map) be factored into ecological corridors.		

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Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4576	N/A	Voluntary and Community Organisations	Support the Council's decision not to allocate Chattenden Barracks or any other large housing sites in close proximity to the boundary of the SSSI, however concern raised the SSSI remains vulnerable to unplanned residential development within the 400m zone and the cumulative effects of unmitigated developments within the wider area of potential impact. Also broadly supports proposed strategic environmental management plan and framework, however further detail and clarification sought on what this means in practice. Would welcome clearer policy approach.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden	Retention of allocation HHH5 in the draft Local Plan in our view fails the tests of soundness as it is not justified, effective or compliant with national policy (NPPF para 36 b-d) and should be removed. We note that the Sustainability Appraisal (SA) of the Medway Local Plan (Volume 2 – Regulation Yes9 SA Report) confirms our view, giving the following assessment in respect of the threats or pressures to nationally designated biodiversity sites arising from proposed housing within the draft Local Plan (in particular allocations HHH5 and SRYes4 in respect of threats to Chattenden Woods and Lodge Hill SSSI) (Table 8.Yes, pages 65-66): "In line with the precautionary principle, at the time of writing, a potential long-term significant adverse effect on nationally designated biodiversity sites, including the fauna and flora they support, is identified. The Nightingale population at Chattenden Woods and Lodge Hill SSSI is nationally important and warrants particular attention and caution in the plan making process." We agree with this assessment and consider it to be a damning admission of the failure of the draft Local Plan to comply with the protections provided to SSSI under the NPPF and therefore failure of the draft Plan to satisfy the tests of soundness. As mentioned above, we broadly welcome commitments under SA8 (para Yes9), as follows: "A strategic environmental management plan will be prepared and	Yes	The RSPB's concerns relate to important matters regarding the protection of statutory wildlife sites within Medway. We would like to participate the hearing sessions to ensure that these issues are thoroughly examined and the implications for the soundness of the draft Local Plan fully understood.
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4576	N/A	Voluntary and Community Organisations	Object to proposed allocation HHH5 as unable to recommend additional policy safeguards to ensure that this proposed allocation avoids or effectively mitigates potential harmful urban pressures on the SSSI Nightingale population. Also allocating this site fails the tests of soundness as it is not justified, effective or compliant with national policy (NPPF para 36 b-d), particularly as there are alternative locations for new housing it does not comply with the 'mitigation hierarchy' set out in the NPPF (para 193a).	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden (Site HHH5)			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4576	N/A	Voluntary and Community Organisations	We recommend that policy wording be added to clarify that the school and any other non-residential development should be located within the north-western section of the site, and all residential units placed beyond 400m from the SSSI where urbanisation impacts are more capable of being mitigated.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden (Site HHH6)	Policy wording be added to clarify that the school and any other non-residential development should be located within the north-western section of the site, and all residential units placed beyond 400m from the SSSI where urbanisation impacts are more capable of being mitigated.		
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4576	N/A	Voluntary and Community Organisations	Does not have any 'in-principle' concerns regarding HHH19 subject to the necessary ecological impact assessments at application stage.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden (Site HHH19)			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4576	N/A	Voluntary and Community Organisations	Agree with Sustainability Appraisal assessment on sites HH5 and SR14 and threats to SSSI. Consider it is a failure of the draft Local Plan to comply with the protections provided to SSSI under the NPPF and therefore failure to satisfy the tests of soundness.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4577	N/A	Voluntary and Community Organisations	Object to Site SR14 as cannot suggest safeguards to avoid or effectively mitigate potential harmful urban pressures on the SSSI Nightingale population. Also concern with cumulative impact with previous permissions for nearby development. Allocating this site fails the tests of soundness as it is not justified, effective or compliant with national policy (NPPF para 36 b-d), particularly as there are alternative locations for new housing it does not comply with the 'mitigation hierarchy' set out in the NPPF (para 193a).	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	Clear policy wording should be contained in the new Medway Local Plan in order to robustly protect the interest features of the Chattenden Woods and Lodge Hill SSSI through a 400m buffer to new residential development. Removal of allocation SRYes4.	Yes	The RSPB's concerns relate to important matters regarding the protection of statutory wildlife sites within Medway. We would like to participate the hearing sessions to ensure that these issues are thoroughly examined and the implications for the soundness of the draft Local Plan fully understood.

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4578	N/A	Voluntary and Community Organisations	Hoo Peninsula Strategic Environmental Programme - suggest altering the wording of the third sentence in this section to read: Development will should support the conservation, and enhancement and of Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SPA, Ramsar site and SSSI. Seek clarification and detail on what these statements mean in practice but a clear policy approach that would provide long-term and robust protection to the SSI Nightingales. Urged for the implementation of a strategic approach to protecting the Chattenden Woods and Lodge Hill SSSI and its Nightingales including the introduction of a 400m buffer around the SSSI. Reasons given for the 400m buffer. Without a clear policy approach, the Local Plan fails the tests of soundness as it is not justified, effective or compliant with national policy (NPPF para 36 b-d), particularly as there are alternative locations for new housing it does not comply with the 'mitigation hierarchy' set	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Hoo Peninsula Strategic Environmental Programme - suggest altering the wording of the third sentence in this section to read: Development will should support the conservation, and enhancement and of Chattenden Woods and Lodge Hill SSSI, and the Medway Estuary and Marshes SPA, Ramsar site and SSSI.	Yes	The RSPB's concerns relate to important matters regarding the protection of statutory wildlife sites within Medway. We would like to participate the hearing sessions to ensure that these issues are thoroughly examined and the implications for the soundness of the draft Local Plan fully understood.
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4578	N/A	Voluntary and Community Organisations	pleased to see policy wording supporting the implementation of the Kent and Medway Local Nature Recovery Strategy (LNRS) to strengthen biodiversity and the natural environment. wording that affirms development will only be permitted if it can demonstrate that it will protect and enhance the natural environment and biodiversity. We further welcome commitments that developments should consider the integrity of linkages and networks for nature and seek opportunities to strengthen biodiversity networks.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4578	N/A	Voluntary and Community Organisations	We support the linking of Biodiversity Net Gain (BNG) to the LNRS.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4579	N/A	Voluntary and Community Organisations	Considers Bird Wise SAMMS reflects the current best available evidence on how to address in combination impacts from recreational disturbance. Pleased to see acknowledgement of the importance of functionally linked land. The findings of the SPA Review should be referenced in policy wording in order to strategically consider the need for future enhancement and expansion of the SPA. Site SR51 raises concerns of exacerbating recreational disturbance impacts to RSPB Cliffe Pools and may not be mitigable through Bird Wise contributions alone. urge evidence is sought to demonstrate harmful impacts could be avoided or adequately mitigated before the site is put	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites			
Online	212	Online (OPUS)	RSPB England (Mr Joseph Beale) [212]	4580	N/A	Voluntary and Community Organisations	Regarding Site HHH26 recommends additional policy wording is needed to recognised that appropriate mitigation will be essential to address the impacts of the new development will place on the Northward Hill SSSI and RSPB reserve.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow	Additional policy wording is needed to recognised that appropriate mitigation will be essential to address the impacts of the new development [site HHH26] will place on the Northward Hill SSSI and RSPB reserve.	Yes	The RSPB's concerns relate to important matters regarding the protection of statutory wildlife sites within Medway. We would like to participate the hearing sessions to ensure that these issues are thoroughly examined and the implications for the soundness of the draft Local Plan fully understood.
Email	E.201	File M	Rt Hon Kelly Tolhurst	SDLP 1302	N/A	Members of the public	NPPF paragraph 11(b)(l)) have not been robustly considered.	1. Overview	1.1 Introduction				
Email	E.201	File M	Rt Hon Kelly Tolhurst	SDLP 1303	N/A	Members of the public	Concern about scale and housing sustainability and that majority of housing put forward are on the Peninsula. Greater clarity needed on what is being proposed on the Peninsula. Joining up of distinct villages disrupts the character of the area. Housing targets are having disproportionate impact on the area and will put Strood and Rochester under enormous pressure to deliver	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.201	File M	Rt Hon Kelly Tolhurst	SDLP 1304	N/A	Members of the public	Concern about Medway City Estate being considered for housing development despite the current needs that already exist which is the lack of commercial sites for businesses.	7. Economic Development					
Email	E.201	File M	Rt Hon Kelly Tolhurst	SDLP 1305	N/A	Members of the public	Concerned about impact on SSSI and Ramsar sites.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			
Email	E.201	File M	Rt Hon Kelly Tolhurst	SDLP 1306	N/A	Members of the public	Concerned about impact on existing businesses following a loss of Chatham Docks and the alternative plan should be carried forward.	7. Economic Development					

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Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1623	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1624	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1625	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1626	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1627	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1628	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1629	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1630	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.33	File Q	Russell Lister	SDLP 1631	N/A	Members of the Public	Concern that the Peninsula is swamped with housing , causing loss of top grade farmland and loss of wildlife	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1498	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1499	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1500	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1501	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1502	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1503	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1504	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1505	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1506	N/A	Members of the Public	No details around traffic and road improvements	9. Transport					
Hoo Peninsula Campaign (Additional responses)	H.22	File Q	S L Farrow	SDLP 1507	N/A	Members of the Public	Moved to the area for a quieter and peaceful life, attracted to the rare wildlife. These areas are rare in south east and need to be conserved before disappearing forever	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1478	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1479	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					

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Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1480	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1481	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1482	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1483	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1484	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1485	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1486	N/A	Members of the Public	Redeveloping Chatham Docks risks job loss and erodes heritage.	3. Spatial Development Strategy					
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1487	N/A	Members of the Public	Green Belt loss harms wellbeing and biodiversity.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.20	File Q	S O'Hanlon	SDLP 1488	N/A	Members of the Public	Housing scale exceeds infrastructure capacity, with poor transport, overstretched services, and severe congestion—especially around Four Elms—making plans unsustainable without major improvements	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.22	File L	Sam Hatton	SDLP 59	N/A	Members of the Public	Objects to release of Green Belt on land north of Brompton Farm Road based on absence of policy justification, non-compliance with NPPF, ongoing and strong contribution of Green Belt purposes, environmental sensitivity and landscape character, planning history supports continued protection, political and community opposition, conflict with recent national environmental policy, legal and procedural concerns	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Removal of site from Local Plan Policy SA6	No	
Email	E.22	File L	Sam Hatton	SDLP 60	N/A	Members of the Public	Unsuitable infrastructure including transport and highways congestion concerns, under resourced GPs surgeries, dentists and schools in the Strood area. Also lack of sustainability, worsening existing shortfalls in social sustainability	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.18	File L	Sarah Wood	SDLP 45	N/A	Members of the Public	Object to Lower Rainham development which is "ill conceived" and "ill planned". The orchards are " the last green lungs of Rainham" to walk through. Also concern over traffic levels on the local roads, especially the Lower Rainham Road. Object to building on prime agricultural land	14. Site Allocations	14.11 Lower Rainham	Figure 15: Lower Rainham Concept Plan		Yes	To consider my comments further
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1295	N/A	Voluntary and Community Organisations	Concern over further strain that will be placed on already unacceptable safety and congestion in the area.	1. Overview	1.4 Duty to Cooperate				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1296	N/A	Voluntary and Community Organisations	The Regulation 18 Consultation Summary does not show that community-derived strategic issues raised in the Neighbourhood Plan were adequately incorporated into joint-working discussions. Failure to evidence how specific Neighbourhood Plan policy concerns (HOO4 housing mix, HOO8 environment, HOO11 transport were addressed before advancing to Reg 18)	1. Overview	1.4 Duty to Cooperate				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1297	N/A	Voluntary and Community Organisations	Fails soundness test as evidence base fails to integrate the capacity of limits of the Hoo Peninsula as set out in the NP's infrastructure priorities, resulting in overallocation of development	1. Overview	1.3 How the plan has been prepared				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1298	N/A	Voluntary and Community Organisations	Alternatives that avoid disproportionate environmental harm to the Hoo Peninsula need to be explored.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1299	N/A	Voluntary and Community Organisations	Lack of signed final statements of common ground and unresolved 'under discussion' items on strategic matters shows no clear mechanism for implementation according to NPPF paragraph 28 (such as waste management, minerals, supply, transport impacts)	1. Overview	1.3 How the plan has been prepared				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1300	N/A	Voluntary and Community Organisations	Inconsistent with national policy (doesn't conserve and enhance the natural, built, historic environment), special protection areas and WWII Heritage assets protected under HOO7 of the NP	1. Overview	1.3 How the plan has been prepared				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1301	N/A	Voluntary and Community Organisations	Diversity Impact Assessment (DIA) is insufficient to demonstrate compliance with the Public Sector Equality Duty (PSED).	1. Overview	1.1 Introduction				

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Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1309	N/A	Voluntary and Community Organisations	Reg 18 consultation doesn't comply with NPPF requirements for early proportionate and effective engagement, particularly in how responses were handled in Hoo	1. Overview	1.4 Duty to Cooperate				
Email	E.200	File V	Save The Hoo Peninsula Campaign (STHP)	SDLP 1294	N/A	Voluntary and Community Organisations	Proposed development plans aren't sustainable and there is local road infrastructure and the lack of provision for improvement to the	1. Overview	1.4 Duty to Cooperate				
Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4355	N/A	Business	Concern over loss of MCE employment highlighting uniqueness of location and Scotline's requirement for deepwater wharfage and open storage space. Protection of critical infrastructure.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.1	The plan should explicitly safeguard existing maritime infrastructure on the Frindsbury Peninsula, including deep-water terminals and associated open storage land. It should recognise the national importance of river freight and commit to protecting operational port facilities from redevelopment or obstruction. Any proposals for bridges or crossings must ensure a minimum clearance of 30 metres at Mean High Water Springs (MHWS) to maintain navigational access. The plan should promote infrastructure-led regeneration that integrates sustainable freight and supports long-term economic resilience.	Yes	Scotline Ltd wishes to participate in the hearing sessions to ensure that the implications of the proposed redevelopment on nationally significant maritime infrastructure are fully understood and considered. Our operations on the Frindsbury Peninsula play a critical role in the UK's timber supply chain and contribute to sustainable freight movement. We believe our direct input will help clarify the operational, environmental, and economic consequences of losing deep-water port capacity and ensure that the plan
Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4356	N/A	Business	Address site constraints at MCE but protect marine operators which rely on deep-water access, open storage, and river proximity features that cannot be replicated elsewhere. Good accessibility for staff, employment of around 100 skilled local people.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.2	The plan should distinguish between businesses that can be relocated and those, like maritime operators, that rely on fixed infrastructure such as deep-water access and open storage. It should recognise the strategic value of retaining these operations on-site. The plan should also acknowledge the estate's role in providing accessible employment to surrounding communities and commit to regeneration that supports sustainable, long-term industrial use alongside infrastructure improvements.	Yes	Scotline Ltd requests to participate in the hearing to provide insight into the operational realities of maritime businesses on the estate. Our input will help ensure that regeneration proposals account for the unique infrastructure needs and employment contributions of river-based industries.

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Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4357	N/A	Business	Scotline tied to this location on MCE - Long history at this location. Relocation would undermine supply chain. Local plan should be infrastructure led and business focused.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.3	The plan should acknowledge that while some businesses may relocate, maritime operators face relocation costs that are prohibitive for private investment. It should recognise the unique infrastructure requirements of river-based industries—such as deep-water access and open storage—and the long-term investment already made by operators like Scotline. The plan should commit to a regeneration approach that retains and supports strategically located businesses, rather than assuming relocation is viable. Existing operators should be actively included in shaping the future of the estate.	Yes	Scotline Ltd requests to participate in the hearing to provide evidence on the operational and financial challenges of relocating maritime infrastructure. While relocation is technically possible, the capital and ongoing operational costs—particularly for dredging—are prohibitive without public support. Maritime planning horizons are long-term; our vessels are expected to remain in service for 20–30 years, and our operations are built around fixed infrastructure. This is not a model that can easily
Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4358	N/A	Business	Outlining importance of Scotline's activities to Medway economy and national importance, business history and risk of job losses.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.4	The plan should recognise that anchor businesses include not only land-based manufacturers but also nationally significant maritime operators such as Scotline. It should acknowledge that relocation of such businesses is not a viable catalyst for regeneration without substantial public investment. The plan should also reflect the value of maritime-based revenue to Medway's identity as a working river city. To avoid becoming a commuter town, the plan must commit to protecting maritime infrastructure and integrating it into a long-term, inclusive regeneration strategy. Additionally, the plan should consider the increased haulage emissions and inefficiencies associated with relocating freight operations away from the estate's strategic access to the M25 and national road network.	Yes	Scotline Ltd requests to participate in the hearing to ensure that the role of maritime infrastructure in Medway's economy is fully understood and reflected in the plan. As a nationally significant operator with long-term investment in the Frindsbury Peninsula, we can provide insight into the operational, financial, and strategic implications of redevelopment. We also wish to contribute constructively to discussions around inclusive regeneration, infrastructure

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Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4359	N/A	Business	Caution required over public access and marine zone safety under international maritime regulations. Need for safe and unobstructed passage for commercial shipping. Support discussion with Council over balancing public realm improvements with the operational and regulatory requirements of maritime infrastructure.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.6	The plan should acknowledge that operational port areas, including ISPS Code-compliant terminals, are not suitable for public access due to safety and security regulations. Any proposals for riverside paths or crossings must be designed to avoid encroachment on these areas and must ensure safe, unobstructed passage for commercial shipping. The plan should commit to working with maritime operators to balance public realm improvements with the operational integrity of nationally significant infrastructure.	Yes	Scotline Ltd requests to participate in the hearing to provide operational insight into the regulatory and safety requirements of ISPS Code-compliant port facilities. Our terminals are managed risk environments with continuous vessel movements and heavy equipment in use. We believe our input will help ensure that proposals for riverside access or crossings are compatible with the secure, operational nature of maritime infrastructure and do not compromise commercial navigation or public
Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4360	N/A	Business	Concern raised over flood risk, residential use in flood zone and commercial use being more appropriate in flood prone areas. Support for adopting flood management solutions. Support for maintaining port use.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.7	The plan should acknowledge that commercial port operations are a more appropriate use of land in flood-prone areas than residential development. It should support collaboration with existing operators to explore how flood mitigation measures can be integrated into the wider area without compromising operational continuity. The plan should also encourage innovation in flood resilience through partnership with businesses committed to long-term investment.	Yes	Scotline Ltd requests to participate in the hearing to contribute to discussions around flood risk management on the Frindsbury Peninsula. We are open to exploring collaborative solutions that improve flood resilience while maintaining safe and continuous port operations. Our input can help ensure that flood strategies are compatible with the realities of active maritime

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Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4361	N/A	Business	Requesting engagement of Council with local marine operators and wider marine sector. Concern over impact of decommissioning port infrastructure.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.8	The plan should set a clear precedent by recognising the irreplaceable value of maritime infrastructure and embedding long-term protections against its conversion to residential use. Medway Council has the opportunity to lead by example—ensuring that all port and wharfage land is safeguarded not only in this project but through future planning policy. Maritime land represents jobs, international trade, and the ability for working people to remain in the heart of their communities. In contrast, high-value residential development promotes speculative private investment—both domestic and international—often driving land prices up and displacing productive industry and local residents. As waterfront land values rise, maritime operators are forced to compete with residential developers, increasing port charges and the cost of goods for everyone. By locking maritime land into its intended use, it can continue to circulate between marine operators at sustainable values—supporting national trade, economic resilience, and equitable access to opportunity.	Yes	Scotline Ltd requests to participate in the hearing to contribute to discussions on the long-term safeguarding of maritime infrastructure within the Frindsbury Peninsula Concept Plan. As a nationally significant operator, we can offer insight into the operational realities of port-based businesses and the broader economic consequences of reallocating waterfront land. We also wish to support a constructive dialogue with the Council and the wider maritime sector to help
Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4362	N/A	Business	Critical need for wharf access and open storage land essential to maritime operations, impact on marine freight. Protect land for marine use, wharf frontage and open storage.	14. Site Allocations	14.15 Employment Sites	Paragraph 14.15.1	The plan should explicitly allocate and protect land for maritime operations, including wharf access and open storage areas, not just factory and office space. This would support businesses that rely on river transport and bulk cargo handling, helping to retain skilled jobs, reduce road freight, and strengthen Medway's role in sustainable logistics. Crucially, it would also preserve the unique identity of Medway as a working river town and safeguard its long-standing river trading heritage, which has shaped the area's economy, culture, and character.	Yes	Our participation is necessary to ensure the practical needs of maritime freight operations are fully understood and considered in the plan. As operators of nationally significant river terminals, we can provide first-hand insight into how site allocations and river crossings can be designed to support both regeneration and continued commercial river use. Without this input, there is a risk that critical infrastructure—such as wharf access and open storage—may be overlooked, affecting jobs,

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Online	1488	Online (OPUS)	Scotline (Mr Jamie Lowe) [1488]	4393	N/A	Business	Request for amendment to figure 16 to indicate current operational wharf areas on the west side of Frindsbury Peninsula. Outlining scale of maritime infrastructure economic activity at Scotline terminal. Concern leaving this out risks underrepresenting strategic importance of the area, inappropriate land use. Including the amendments supports sustainable logistics, protects Medway's working river identity and areas long-standing role in international trade and marine operations.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Paragraph 14.14.8	(Change to Figure 16 requested) <i>The plan should include specific policies to identify, protect, and prioritise operational maritime infrastructure—particularly commercial wharves and open storage areas. These facilities are geographically rare, strategically located, and essential to national freight capacity. Once lost to redevelopment, they cannot be replaced elsewhere. The plan should recognise their long-term economic, environmental, and logistical value and ensure that land use designations and infrastructure proposals do not compromise their continued operation. This would support sustainable transport, protect skilled employment, and preserve Medway's identity as a working river.</i>	Yes	Our participation is necessary to ensure that the Local Plan fully considers the operational realities and infrastructure needs of active maritime freight businesses. As a long-standing operator of commercial river terminals, we can provide unique, evidence-based insight into the implications of land use designations, infrastructure proposals, and river access. Our contribution will help ensure the plan supports sustainable transport, protects irreplaceable marine infrastructure, and
Email	E.194	File M	Sean Varnham	SDLP 1286	N/A	Members of the Public	SA6 conflicts with the Council's own adopted and emerging policies, its recent planning decisions, and the evidence in its 2025 Green Belt Review. It fails to demonstrate exceptional circumstances, ignores reasonable alternatives, undermines key Green Belt purposes, risks flooding existing properties, worsens air quality, damages the rural economy, and relies on undeliverable infrastructure. The process has lacked transparency, and the decision is premature in the context of unresolved cross-boundary impacts.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1458	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1459	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1460	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1461	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1462	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1463	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1464	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.17	File Q	Sheila Hayward	SDLP 1465	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.4	File L	Sidney Anning	SDLP 5	N/A	Members of the Public	Concern over the loss of Chatham Docks.	7. Economic Development	7.2 Employment Strategy	Policy S10: Economic Strategy			
Email	E.4	File L	Sidney Anning	SDLP 6	N/A	Members of the Public	Concern about overdevelopment as much of the surrounding land has already been converted to housing, offices, and retail, with more flats proposed and converting remaining industrial land to housing will further reduce job opportunities	5. Built Environment					
Email	E.4	File L	Sidney Anning	SDLP 7	N/A	Members of the Public	Concerns about housing affordability and that decisions are prioritising profit over community.	6. Housing					

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Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 148	N/A	Statutory Bodies	Agrees with principles of minimising waste production, managing waste in accordance with the Waste Hierarchy and supporting suitable facilities and capacity. The requirement for a Circular Economy Statement in paragraph 12.3.3 is also supported, as a reasonable tool for ensuring policy compliance.	12. Waste Management	12.2 Future management of waste in Medway	Vision for Waste Management & 12.3.3			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 149	N/A	Statutory Bodies	Its integration of the waste and local plan responsibilities of Medway Council, a policy gap that is often otherwise an issue in fully driving waste management up the Waste Hierarchy.	12. Waste Management	12.3 Waste prevention	Policy DM23: Waste prevention			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 150	N/A	Statutory Bodies	Support for net self-sufficiency.	12. Waste Management	12.1 Introduction	Paragraph 12.1.10			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 151	N/A	Statutory Bodies	Support and amend.	12. Waste Management	12.5 Provision of new waste management facilities	Policy T35: Provision of additional waste management facilities	Recommends to make policy T35 Targets specified in the Plan' more easily identifiable		
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 152	N/A	Statutory Bodies	Support - Note policy style as alternative to allocations, areas of locations of search. Offers greater flexibility where waste sites have not been proposed or not needed immediately.	12. Waste Management	12.6 Location of waste management facilities	Policy T36: Location of waste management facilities			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 153	N/A	Statutory Bodies	Support - but amendment suggested in relation to carbon emissions.	12. Waste Management	12.7 Other recovery	Policy T37: Other recovery	Recommends all carbon emissions not just non biogenic ones are captured, utilised and failing that stored.		
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 154	N/A	Statutory Bodies	Non inert landfill - General support - of not allocating land despite additional landfill capacity being needed.	12. Waste Management	12.8 Landfill	Policy T38: Non-inert Landfill			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 155	N/A	Statutory Bodies	Beneficial use of inert waste by permanent deposit is supported - fully consistent with regional work.	12. Waste Management	12.8 Landfill	Policy T38: Non-inert Landfill			
Email	E.43	File U	South East Waste Planning Advisory Group (SEWPAG)	SDLP 156	N/A	Statutory Bodies	SEWPAG recognises the need to protect existing waste management capacity from redevelopment for other non waste uses - support for policy.	12. Waste Management	12.4 Safeguarding of existing waste management facilities	Policy T34: Safeguarding of existing waste management facilities			
Email & OPUS	E.81	File U	Southern Water	SDLP 263	N/A	Statutory Bodies	* Sites SNF8, SNF17, SNF23, SNF24, SNF30, SNF31 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Sites SNF15, SNF34 & SNF41 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion. * Sites SNF20 & SNF32 - Southern Water (and some private) infrastructure crosses parts of the site and may require easements or diversion. * Sites SNF35, SNF38 & SR25 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Sites SNF44 & SW6 - Private infrastructure appears to cross part of the site and may require easements or diversion.	14. Site Allocations	14.6 Strood Town centre and Surrounds	Policy SA5: Strood Town centre and Surrounds		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 264	N/A	Statutory Bodies	* Site SNF1 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Sites SNF3 & SR5- Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	

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Email & OPUS	E.81	File U	Southern Water	SDLP 265	N/A	Statutory Bodies	* Site HW3 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water potable water main infrastructure also crosses parts of the site and will require easements or diversion. * Site HW11 - Initial checks indicate this site may be up to 600m from the wastewater network. Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Site LW4 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Site LW 6 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Private infrastructure appears to cross part of the site and may require easements or diversion. * Site LW7 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Site LW8 - Nearest connection up to 840 m away. Limited	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 266	N/A	Statutory Bodies	* Sites HHH5, HHH11, HHH24 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Sites HHH6, HHH8, HHH25 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion. * Site HHH12 - Site contains a sealed pressurised rising main; no building over or near it; diversion requires Southern Water approval and may not be viable. Limited sewer network capacity indicated; development may need phasing and network reinforcement before full occupation. * Sites HHH22 & HHH31 - Site is over 500 m from the wastewater treatment works but has limited network capacity. Development may require phasing and network reinforcement before full occupation. Southern Water assets cross the site and may need easements or diversion. * Site HHH33 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Private infrastructure appears to cross part of the site and may require easements or diversion. * Site HHH41 - Private infrastructure appears to cross part	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 267	N/A	Statutory Bodies	* Site HHH29 - Initial checks indicate this site is over 500m from the wastewater network and has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Site HHH26 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow		No	

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Email & OPUS	E.81	File U	Southern Water	SDLP 268	N/A	Statutory Bodies	* Site RN9 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion. * Site RN17 - Southern Water potable water main infrastructure crosses parts of the site and will require easements or diversion. * Site RN23 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 269	N/A	Statutory Bodies	* Sites AS11, SR14 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Site SR4 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Site CHR14 - Within 500 m of Motney Hill WWTW: odour assessment required. Contains sealed pressurised rising main: cannot build over/near it. Diversion only possible via Southern Water application and may not be viable; design must avoid the asset. * Site SR51 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Sites AS25, SR7 - no comment.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 270	N/A	Statutory Bodies	* Site AS2 - Initial checks indicate this site is over 1000m from the wastewater network. Private infrastructure also appears to cross parts of the site and may require easements or diversion. Site AS28 - Initial assessments show this site is within 500m of Grain wastewater treatment works, therefore an odour assessment would be required to inform site layout and/or other odour mitigation. * Site AS6 - Initial checks indicate this site is over 800m from the wastewater network. * Sites AS10, RWB11, RWB25, SR48 and W3 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Site GN8 - site contains old, sensitive, critical sewer assets. Developers must not build over these assets; diversion requires liaison with Southern Water and may not be viable. Sewers must be allowed for in site layout. Easement required: minimum 6 metre (or more depending on pipe size/depth), clear of buildings and substantial tree planting. * Sites HW6, RN30 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Site LW2 - Private infrastructure appears to cross part of the site and may require easements or diversion. * Site SR49 - Southern Water (and some private) infrastructure crosses parts of the site and may require easements or diversion.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites		No	

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Email & OPUS	E.81	File U	Southern Water	SDLP 271	N/A	Statutory Bodies	* Sites CHR16 & CHR17 - Southern Water potable water main infrastructure crosses parts of the site and will require easements or diversion. * Sites FH1, HHH19 & HHH35 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water potable water main infrastructure crosses parts of the site and will require easements or diversion. * Site HHH36 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water potable water infrastructure (and what appears to be private wastewater network infrastructure) also crosses parts of the site and will require easements or diversion. * Sites RWB5 & SMI6 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 272	N/A	Statutory Bodies	* Site GN3 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Sites GN6, GN15 & SMI6 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 273	N/A	Statutory Bodies	* Sites GS7 & GS14 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. * Site GS19 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. ~~* Sites GS4 & GS26 - no comment~~	14. Site Allocations	14.4 Gillingham District Centre	Policy SA3: Gillingham District Centre		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 274	N/A	Statutory Bodies	* Sites CCB25, CCB35, FP11 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Site FP1 - Water Mains crossing site. * Sites FP12 & RWB19 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites		No	
Email & OPUS	E.81	File U	Southern Water	SDLP 275	N/A	Statutory Bodies	* Sites CCB1, CCB12, CCB24, CCB27 - Brick-arch sewers present; critical assets. No building over them; diversion via Southern Water may not be viable. Site layout must allow ≥6 m easement clear of buildings and large trees. * Sites CCB8, CCB15, CCB20, CCB31, CCB49, FP10 & FP25 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion. * Site CCB25 - Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. * Sites CCB37, GS2 & L9 - Southern Water infrastructure crosses parts of the site and may require easements or diversion. ~~* Sites CCB3, CCB4, CCB7, CCB19, CCB21, CCB30, CCB39, CCB41, L7 & L12 - no comment~~	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds		No	
Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4434	N/A	Statutory Bodies	Sports England supports the principles of policy DM21 but recommends using Medway's playing pitch strategy over FIT standards, aligning with the NPPF's 103's emphasis on ~~assessments~~	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces	Recommends wording should be amended to replace the FIT with Medway's Playing Pitch Strategy recommendations for outdoor sport which may be available prior to the EIP for the Local Plan		
Online	574	Online (OPUS)	Sports England (Mr bob Sharples) [574]	4436	N/A	Statutory Bodies	Sport England and Medway Council are preparing sports strategies, due Easter 2026, which are expected to inform Policy T28.	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces			
Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4437	N/A	Statutory Bodies	Sport England supports Policy S24, emphasizing evidence-based infrastructure. With strategies in development alongside Medway Council, expected by Easter 2026, the council will then be positioned to seek contributions for sports infrastructure to benefit emerging communities.	10. Health, Communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			

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Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4438	N/A	Statutory Bodies	Sport England supports Policy SA6 in principle but recommends replacing FIT Standards with Medway's upcoming Playing Pitch Strategy, aligning with NPPF 103's emphasis on assessments. Joint strategies are expected by Easter 2026 to inform planning for outdoor sports infrastructure.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West	Recommends replacing FIT Standards with Medway's upcoming Playing Pitch Strategy, aligning with NPPF 103's emphasis on assessments.		
Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4439	N/A	Statutory Bodies	Supportive of Policy SA7, however the NPPF para 103 does not support standards it promotes assessments. Therefore the wording to the Fields in Trust Standards (2024), should be replaced with reference to Medway's Playing Pitch Strategy recommendations for outdoor sport which may be available prior to the EIP for the Local Plan.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4440	N/A	Statutory Bodies	Supportive of Policy SA8. Sport England is in the process with Medway Council in preparing a playing pitch strategy and built facility strategy which should be commissioned in the autumn 2025, with completion around Easter 2026. This should inform the level of contribution and formal sports provision required to create a sustainable community.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Online	574	Online (OPUS)	Sports England (Mr bob Sharples) [574]	4441	N/A	Statutory Bodies	Sport England welcomes the inclusion of its Active Design Guidance in Policy (T)20.	9. Transport	9.3 Active travel interventions	Policy T20: Riverside Path			
Online	574	Online (OPUS)	Sports England (Mr Bob Sharples) [574]	4442	N/A	Statutory Bodies	Sport England welcomes the inclusion of its Active Design Guidance in Policy T27 and would be happy to work with Medway on schemes as they come forward.	10. Health, Communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing			
Email	E.149	File E	St Andrews Leisure Development Ltd	SDLP 845	DHA (John Collins)	Developers or Agents	Requests St Andrews Lake site is removed from greenbelt to enable wider uses/further expansion.	4. Natural Environment	4.12 Green Belt	Policy S7: Green Belt			
Email	E.149	File E	St Andrews Leisure Development Ltd	SDLP 846	DHA (John Collins)	Developers or Agents	Requests policy T13 specifically references St Andrews Lake to cover the site and such uses and more widely 'leisure and tourism site'.	7. Economic Development	7.6 Tourism, culture and visitor accommodation	Policy T13: Tourism, culture and visitor accommodation			
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 611	N/A	MPs, Members and Parish Councils	Infrastructure and transport constraints on Hoo Peninsula and lack of public transport system.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 612	N/A	MPs, Members and Parish Councils	Failures' in relation to Hoo Peninsula Allocations - concerns over traffic impact on Peninsula and Grain.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 613	N/A	MPs, Members and Parish Councils	Environmental capacity of the estuary has not been cooperatively managed.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements			
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 614	N/A	MPs, Members and Parish Councils	Environmental capacity of the estuary has not been cooperatively managed.	14. Site Allocations	14.13 Other Sites	Policy SA12: Other Sites			
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 615	N/A	MPs, Members and Parish Councils	North Kent Marshes - the development proposals would substantially damage this area - use of greenfield sites without any regard to the damage to the environment, population and wildlife.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.120	File R	St James, Isle of Grain, Parish Council	SDLP 616	N/A	MPs, Members and Parish Councils	Environmental and ecological non-compliance - impact on protected sites on Hoo Peninsula.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			

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Email	E.82	File B	St John's College	SDLP 276	Savills (Mark Hodgson)	Developers or Agents	SR4: * Objection to wording used - 'Wastewater/foul Drainage' section of the policy * This places an unreasonable and unduly onerous requirement, which could harm financial viability or sustainability of the proposed residential allocations. * Places responsibility on the developer to negotiate with the utility provider, which should be on the utility provider instead	4. Natural Environment	4.8 Flood and water management	Policy DM1: Flood and Water Management	The following wording of the Policy should be deleted in order to make the policy sound: 'Policy DM1 – Flood and Water Management Wastewater/Foul water drainage– 'Development proposals must ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change....Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker'. (strikethrough illustrates wording to be deleted to make Plan sound). The proposed Policy should be worded as follows: 'Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. To achieve consistency with the rest of the Plan, and with national planning policy, it is essential that the wording of Policy DM1 is altered by the deletion of part of the wording contained within the 'Wastewater/foul drainage section of	Yes	The proposed wording of Policy DM1 provides an undue onus on the landowner, developer and/or applicant. A requirement to negotiate and agree on mitigating measures between applicant and sewerage service provider/undertaker is unreasonable and makes the Plan unsound. It is considered crucial that the St John's College representatives have the opportunity to participate and explain these issues fully and for the Inspector to be able to ask questions or
Email	E.82	File B	St John's College	SDLP 277	Savills (Mark Hodgson)	Developers or Agents	SR4: *The policy is ambiguous and extremely subjective and is therefore ineffective * Surveying of adjacent land parcels to the development site is unrealistic and unreasonable. If the criterion is not deliverable, it cannot be effective * requiring all applications for site allocations to be accompanied by noise and light assessments is onerous and not justified. * does not clarify whether supporting noise and lighting strategies are solely required for sites within the zone of influence or outside. * policy and supporting text do not define what 'project level applications' and 'larger sites' are. Suggest wording regarding the one of influence is removed from the policy and included as supporting text instead.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites	Proposed changes: * Para 5: New residential development for larger schemes outside of the 6km Zone of Influence may also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the above listed designations (either 'alone' or 'in combination' with other relevant plans and proposals). This requirement will be determined in consultation with the Council and Natural England. * Para 7: ' Development with potential.....of land (or adjacent land parcels of land) support....' * Para 8: 'Project level Planning applications should ... All application for development at the allocations set out should be accompanied with detailed noise assessments and lighting strategies and where necessary construction method statements and management plans should be put in place. All applications for development at the allocations set out should have compliance with the requirements for noise assessments and lighting strategies, as set out in	Yes	It is considered crucial that the St John's College representatives have the opportunity to participate and explain these issues fully and for the Inspector to be able to ask questions of clarification. It is therefore essential that the College is represented at the hearing sessions of the Examination in relation to this specific issue.
Email	E.82	File B	St John's College	SDLP 278	Savills (Mark Hodgson)	Developers or Agents	SR4: * allocating the site is supported * setting a maximum housing figure per site is not compliant with national policy aspirations. Amend with the inclusion of 'circa' instead of 'up to'.	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Rural Settlements	* Amend table at end of policy - 'North of Little Church Road...' to 'North of Lillechurch Road'. * Under 'Number of new homes column, replace 'up to' with 'circa'	Yes	Significant technical work has been undertaken to support the proposed residential allocation. This submission, including a commentary and explanation of the technical issues related to the draft allocation, has made clear that certain phrasing within the proposed Policy SA11, is flawed and without modification, could limit the number of dwellings in the allocation. It is considered crucial that the St John's College representatives have the opportunity to

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Email	E.82	File B	St John's College	SDLP 279	Savills (Mark Hodgson)	Developers or Agents	Support	3. Spatial Development Strategy	3.1 Overview			No	
Email	E.82	File B	St John's College	SDLP 280	Savills (Mark Hodgson)	Developers or Agents	SR4: Objection to wording of Policy: * Why the required number of self-build or custom housing plots not included within the overall affordable housing requirement provision. Allow for self-build to be included within the overall affordable housing requirement; • Why does the Council seeks to set a minimum period of 12 months for which custom/self-build plots are marketed for, with an additional 3 month period in which the Council can decide whether to purchase/acquire the plots to be used as affordable housing. * How is the requirement that after 12 months of marketing of self-build or custom dwelling plots from the grant of planning permission, the Local Authority may acquire the plots to be used as affordable housing justified *The proposed mechanisms and process involved with the sale/relinquishment of land to the LA as set out in the policy is not satisfactorily explained. * build out rates of 35d/ha in the viability assessment is not correct. Minimal evidence has been produced by the LA on viability.	6. Housing	6.9 Self-build and custom housebuilding	Policy T9: Self-build and Custom Housebuilding	* Under Affordable Housing, delete second sentence beginning with: 'Self and custom build units.... provision.' * Under Marketing the self/custom build plot, first bullet, first sentence: 'Once a site.....period of 12 6 months. The 12 6 months...' * Under Marketing the self/custom build plot, second bullet: 'If any plot (s) remain..... or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement of the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction. To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s), This provision will be secured as part of the original Section 106 agreement.	Yes	Given that the reasons for these issues have been identified as a result of much technical work and research, it is considered crucial that the St John's College representatives have the opportunity to participate and explain these issues fully and for the Inspector to be able to ask questions of clarification of the Council. The lack of clear credible evidence to support the draft proposed Policy requires further exploration at Examination. It is therefore essential that the College is
Email	E.82	File B	St John's College	SDLP 281	Savills (Mark Hodgson)	Developers or Agents	SR4: Objection to issues related to policy wording: * Places onerous and unreasonable requirement on developers to provide a heat network, particularly on small to medium sized development sites. * the approach to achieving this policy does not reflect national policy * Applicability of requirements remain uncertain The size threshold is too low * The prescriptive criteria is obligating applicants to select Heat Networks as a principal approach to achieving carbon saving and improving energy efficiency, which limits potential solutions. Should be led by Building Regulations.	13. Energy	13.3 Heat networks	Policy T41: Heat networks	It is suggested that draft Policy T41 'Heat Network' should be modified to be less prescriptive. The wording of the Policy should be modified as set out below, which retains the last paragraph and replaces the first paragraph with new text: 'Development proposals that utilise heat networks will be supported, subject to accordance with other policies within the Plan. Development proposals that secure the use of heat networks will have regard to further feasibility studies and the role of 'anchor loads', such as the Civic Centre and Strood Waterfront sites in Strood and other sites on the Hoo Peninsula'.	Yes	The proposed wording of Policy T41 provides an undue onus on the landowner, developer and/or applicant that is unjustified and not effective. A requirement to provide a development which is served by a Heat Network, or one which is required to demonstrate compliance with the heat hierarchy, will risk the financial viability of many of the smaller to medium sized housing allocations. It is therefore unreasonable and makes the Plan unsound. It is considered crucial that the St John's College

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Email	E.82	File B	St John's College	SDLP 282	Savills (Mark Hodgson)	Developers or Agents	SR4: Objection to wording of policy: * LA's need to work collaboratively with infrastructure providers, which should be evidenced in the IDP. * bullet a) is unnecessary and superfluous. * cumulative impacts on infrastructure should be addressed in the Local Plan	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery	Suggested changes to make the policy sound: * delete the first bullet beginning with: 'Applications can demonstrate that....'	Yes	The proposed wording of Policy S24 provides an undue onus on the landowner, developer and/or applicant. A requirement to demonstrate that there is sufficient infrastructure capacity to support what is proposed will risk the financial viability of many of the smaller to medium sized housing allocations. It is not understood why any infrastructure requirements cannot be secured and delivered by the existing (and usual) mechanisms, namely by planning condition or planning
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1813	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1814	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1815	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1816	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1817	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1818	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1819	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1820	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1821	N/A	Members of the Public	Concern over withdrawal of plans for a new train station at Sharnel street	14. Site Allocations	14.10 High Halstow	Policy SA9: High Halstow			
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1822	N/A	Members of the Public	Proposed quantity of housing will impact character of the area and quality of life for its current residents.	6. Housing					
Hoo Peninsula Campaign (Additional responses)	H.55	File Q	Stefan Davis	SDLP 1823	N/A	Members of the Public	Concern over existing infrastructure (health and social care, road network) struggles and strain to come with population increase	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.58	File L	Stephen Dyke	SDLP 237	N/A	Members of the Public	The re-classification to permit development [on green / grey belt] may also call into question Section 4.3 of the Local Plan, and specifically Policy S2. I am concerned that the effect of development will impact negatively on the nearby local nature reserve of Rede Common	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment		No	

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Email	E.58	File L	Stephen Dyke	SDLP 238	N/A	Members of the Public	Plan is not sound and fails as respect to Strood West. It is not justified or consistent with national policy if development proceeds without environmental impact assessments or biodiversity compensation strategies. Alternatives to sites SNF1 and SNF3 have not been adequately considered. May have been a failure of the duty to co-operate because the degree of cross-boundary co-operation with Gravesham Council over these areas (SNF1 and SNF 3) is unclear. Medway has made assumptions about what Gravesham's Local Plan will contain before theirs was even approved and published.	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West (Sites SNF1, SNF3)	1. Remove sites SNF1 and SNF3 from the proposed development sites as these are part of the protected Green Belt. 2. Engage with the residents in nearby areas to sites SNF1 and SNF3, plus the wider Medway public and other stakeholders, before any decision on re-classification [to grey belt] is taken.	No	
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1704	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1705	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1706	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1707	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1708	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1709	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1710	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1711	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.42	File Q	Stephen Murphy	SDLP 1712	N/A	Members of the Public	Concern that the local plan does not represent the people of Medway and concern infrastructure (healthcare, roads, social spaces) isn't in place to cope with new development.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1589	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1590	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1591	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1592	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1593	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1594	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1595	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1596	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1597	N/A	Members of the Public	Preserving green spaces and farmland is vital for food security, biodiversity, and wellbeing.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement			

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Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1598	N/A	Members of the Public	Housing should focus on urban areas with transport links.	6. Housing					
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1599	N/A	Members of the Public	Countryside must be protected for future generations' health and sustainability.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Hoo Peninsula Campaign (Additional responses)	H.30	File Q	Steven Muspratt	SDLP 1600	N/A	Members of the Public	Infrastructure is overstretched, causing pollution and service strain.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.12	File L	Sue Self	SDLP 31	N/A	Members of the Public	Opposes the local plan- adverse impacts on amenity, infrastructure capacity and environmental complications- particularly opposes development in Capstone if it cannot be mitigated with required infrastructure and green spaces.	3. Spatial Development Strategy					
Email	E.10	File L	Susan Bell	SDLP 25	N/A	Members of the Public	Queries the readiness and viability of existing and future infrastructure needs with increased homes.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.10	File L	Susan Bell	SDLP 26	N/A	Members of the Public	Object to regrading Strood green belt to grey belt. On what grounds and legal standing was this based on apart from meeting unrealistic housing targets? In 2018 Medway and Gravesham both objected to building on this farmland stating it was high grade agricultural farmland and part of the Green Belt to prevent urban Sprawl. The same land is still farmed. Queries if brownfield land has been considered.	14. Site Allocations	14.7 Strood West				
Email	E.10	File L	Susan Bell	SDLP 27	N/A	Members of the Public	Have MC considered the danger of damaging pipelines and the catastrophe it could cause due to homebuilding?	13. Energy	13.2 Energy supply				
Email	E.10	File L	Susan Bell	SDLP 28	N/A	Members of the Public	Queries homebuilding impact on residential amenity.	10. Health, communities and Infrastructure	10.2 Health and wellbeing				
Online	1214	Online (OPUS)	Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx, Chair) [1214]	4890	N/A	Voluntary and Community Organisations	Policy S2 is not sound as it is not consistent with NPPG Natural Environment 2025 paragraph 017, the LNRS cannot be relied upon to be effective.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Please add the following text from NPPG Natural Environment 2025 paragraph 0Yes7 to make this policy consistent with national policy and sound and effective, in particular these key paragraphs referencing swift bricks: "The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 1200X x 2000 Y x 50mm High x 100mm Wide x 100mm Deep	Yes	To provide further information, if required.
Email	E.182	File J	Taylor Wimpey	SDLP 1166	N/A	Developers or Agents	Object to Figure 14 – Hoo St Werburgh and Chattenden Concept Plan. Strategic Green Corridor through Site HHH8 not properly evidenced or justified.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.182	File J	Taylor Wimpey	SDLP 1167	N/A	Developers or Agents	Recommend that the Local Plan is supported by a clear Sports Provision Strategy to include sports pitches, setting out what is required to support growth with clarity on when it is to be delivered, how and by whom	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open pace, outdoor sports and play spaces			

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 772	DHA (Lucy Wilford)	Developers or Agents	The wording of the policy must therefore be re-visited with further evidence provided as to how the vehicle trip credit system is expected to operate to ensure it is deliverable and does not frustrate the delivery of the Local Plan.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 773	DHA (Lucy Wilford)	Developers or Agents	There is no plan or any other tool in the Viability Appraisal which is easily discernible, that determines where the cut off area is for higher or lower value areas. Without the extent of these areas being physically identified on a Plan, the Policy is clearly ambiguous, meaning it is likely to be applied inconsistently and does not provide a positive framework for meeting housing needs contrary to the NPPF (para 15). Does not mention tenures	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Amend policy as follows: bullet point should therefore be amended as set out below to ensure the policy is "Effective". "Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment."	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 774	DHA (Lucy Wilford)	Developers or Agents	The Council has not provided any substantive evidence to demonstrate that it should and can be reliant on such a high proportion of brownfield sites over the plan period and specifically within the first 5 yrs. This is in the context that the Council cannot already demonstrate a 5 yr supply and with a housing buffer of just 203 homes, if just one of the strategic sites does not come forward, the Council will not meet its housing requirement. There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short term. SA4 cannot be relied upon - there is no evidence demonstrating that the site is deliverable.	14. Site Allocations	14.5 River Waterfront	Policy SA4: River Waterfront	Identify more sites.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 775	DHA (Lucy Wilford)	Developers or Agents	There are several policies which set out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF in being “clear” .	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries	The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 776	DHA (Lucy Wilford)	Developers or Agents	Taking into account supporting para 9.10.3, it is essential the flexibility in applying the policy, it brought into the policy wording itself. The additional text below must therefore be included, to ensure the Plan is deliverable and does not unnecessarily frustrate the delivery of other suitable sites.	9. Transport	9.10 Accessibility standards	Policy T26: Accessibility standards	Add to policy text: “Flexibility on the application of the accessibility standard, taking into consideration the particular locations of a Site and its characteristics will be applied However, as a starting point ... ”	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 777	DHA (Lucy Wilford)	Developers or Agents	There are several policies which set out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF in being “clear” .	10. Health, communities and Infrastructure	10.2 Health and wellbeing	Policy T27: Reducing Health inequalities and supporting Health and wellbeing	The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 778	DHA (Lucy Wilford)	Developers or Agents	There are several policies which set out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF in being “clear” .	10. Health, communities and Infrastructure	10.4 Community facilities	Policy T29: Community and cultural facilities	The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 779	DHA (Lucy Wilford)	Developers or Agents	There are several policies which set out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF in being “clear” .	10. Health, communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy DM21: New open space, outdoor sports and play spaces	The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 780	DHA (Lucy Wilford)	Developers or Agents	There are several policies which set out development thresholds for their application, this either being large scale, strategic, major or minor. These are terms which are undefined in the Plan, therefore under what circumstances those policies are to be applied is not clear. It is essential that this is clarified to ensure the Plan is effective and consistent with the requirements of the NPPF in being “clear” .	10. Health, communities and Infrastructure	10.6 Digital communications	Policy DM22: Digital communications	The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 781	DHA (Lucy Wilford)	Developers or Agents	Final version of DtC documentation also not complete. Therefore failed statutory duty.	1. Overview	1.4 Duty to Cooperate				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 782	DHA (Lucy Wilford)	Developers or Agents	Final version of HRA and air quality assessment not available during consultation. Therefore failed statutory duty.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 783	DHA (Lucy Wilford)	Developers or Agents	In the absence of any further SoCG it is therefore unclear whether the Council's statutory duty has been fulfilled and if the Plan does plan to provide for the correct level of housing i.e. there is no residual requirement to address as a result of needs arising from Gravesham Borough Council or any of the other neighbouring boroughs, including Tonbridge and Malling which is also progressing a draft Local Plan and is expected to publish a Regulation 18b Plan autumn 2025.	1. Overview	1.4 Duty to Cooperate			Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 784	DHA (Lucy Wilford)	Developers or Agents	or the Plan to satisfy the legal tests, an additional year must be added to the Plan period extending it to 2042. The housing requirement for the Plan period must therefore be amended to at least 26,176 (16 x 1,636) to be set out in a new strategic housing policy as set out in Section 4.2 below. A new strategic policy must be set out in the Local Plan identifying as a minimum, the total planned housing requirement, the annual housing requirement and the breakdown of how the housing need will be met. As set out in representations in respect of the Plan period, the total amount of housing to be planned for must be at least 26,176 homes over 16yrs. Additional deliverable sites must therefore be identified in the Local Plan to satisfy this requirement.	1. Overview	1.3 How the plan has been prepared	Paragraph 1.3.5	* A new strategic housing policy must be included in the Local Plan, based on a 16yr Plan period which seeks to deliver 26,176 new homes. * Additional sites must be identified to satisfy this requirement. * Further sites must also be identified to demonstrate a 5yr supply of deliverable sites.	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 785	DHA (Lucy Wilford)	Developers or Agents	Having reviewed the Land Availability Assessment (LAA), it is not clear what sites have been included as pipeline sites. In the absence of this information, it cannot be determined whether there is any double counting, since many sites have been permitted at Appeal or are currently under construction, but are also allocated for development in the Local Plan. The LAA and proposed site allocations are considered an overestimation, especially within the first 5 years. If the plan period is increased to 16 years, the minimal buffer will be lost resulting in a possible shortfall. As a minimum the windfall supply must therefore be removed from the 5yr supply. The Council also needs to re-visit its housing trajectory in light of the assessment carried out in the LAA to confirm the housing delivery rate, which is likely to be less than the Council is currently forecasting.	1. Overview	1.3 How the plan has been prepared	Evidence base: Land Availability Assessment		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 786	DHA (Lucy Wilford)	Developers or Agents	In the context that the Council has not identified sufficient sites to meet the housing requirement for the Plan period (which needs to be extended to 16ys), and is unable to demonstrate a 5yr supply of Sites, the Spatial Strategy cannot be considered "Sound" where it fails to meet the requirements of National policy in facilitating the delivery of development to meet its requirements. It can therefore also not be considered "effective".	3. Spatial Development Strategy		Housing Delivery & Supply (including the Council's LAA)		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 787	DHA (Lucy Wilford)	Developers or Agents	Remove reference to the strategic gap. It is not supported by a policy or shown on the proposals map.	3. Spatial Development Strategy	3.1 Overview	Figure 1: Key Diagram		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 788	DHA (Lucy Wilford)	Developers or Agents	The IDP is not linked to the Council's housing trajectory. It is therefore not evidenced that the Council can deliver housing in line with required infrastructure delivery. Furthermore, there are significant identified infrastructure funding gaps both in	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 789	DHA (Lucy Wilford)	Developers or Agents	Furthermore, there are significant identified infrastructure funding gaps both in the IDP and Viability Appraisal.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Viability Assessment		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 790	DHA (Lucy Wilford)	Developers or Agents	Introduction of the 'strategic gap' without evidence is considered unjustified and not positively prepared.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 791	DHA (Lucy Wilford)	Developers or Agents	The policy as currently worded is vague as to how it is to be applied. The implications of this policy are therefore unclear and to what extent it will impact the delivery of both allocated and windfall sites.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure		Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements

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Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 792	DHA (Lucy Wilford)	Developers or Agents	Reference to targeting net zero carbon should be removed. This is a matter that is already addressed in Building Regulations.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Amend bullet 6 of the policy as follows: Details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net zero carbon with due regard to Medway's current Climate Action Plan and Medway Council Corporate Strategies. The whole life cycle of a building should be considered. Where possible proposals for conversion or reuse of buildings will be favoured.		To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.143	File E	Taylor Wimpey & Persimmon Homes	SDLP 793	DHA (Lucy Wilford)	Developers or Agents	Policy is vague regarding refuse recycling and storage.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design	Amend policy as follows: 'Provide for recycling and refuse storage to maximise recycling but without a detrimental impact to the street scene or character of an area'	Yes	To discuss the soundness and legal requirements of the plan with specific reference to: • Evidence Base Documents • Duty to Cooperate • Strategic Policies and Legal Tests • Housing Delivery & Supply (including the Council's LAA) • Spatial Strategy, including Policies S4 and S5 • Proposed Housing Allocations (Policies SA1-SA12) • General Policy Requirements
Email	E.62	File B	Telereal Securitised Property GP Limited	SDLP 255	Turley (Christoper Schiele)	Developers or Agents	Site CCB49: carry forward assumptions of between 50 (conversion/extension) to 100 (full scale redevelopment) new homes.	3. Spatial Development Strategy					
Email	E.62	File B	Telereal Securitised Property GP Limited	SDLP 256	Turley (Christoper Schiele)	Developers or Agents	Support with some suggestions for changes.	14. Site Allocations	14.2 Chatham Town Centre and Surrounds	Policy SA1: Chatham Town and Surrounds	* Add new Design Principle or Supporting Paragraph: Different development options exist for Site CCB49, including full redevelopment or conversion/extension and new build elements, each affecting the site's final housing capacity. The final development option will be subject to site-specific economic considerations at the time of delivery. A future planning application should be accompanied by a detailed justification for the proposed development option illustrating how this optimises the future use of the site, impacts housing capacities and enables delivery. * Review whether Criteria 8 and Design Principle 15 apply to all sites or only those in specific flood zones/where a Flood Risk Assessment is required under the NPPF. Reason: See Section 5 (Paragraph 11) above.		
Email	E.62	File B	Telereal Securitised Property GP Limited	SDLP 257	Turley (Christoper Schiele)	Developers or Agents	Numerous comments on the Sustainability Appraisal concerning climate change and adaptation, biodiversity and geodiversity, landscape and townscape, pollution and waste, health and wellbeing, cultural heritage, transport and accessibility/education, economy and employment	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.83	File B	Terance Butler Holdings	SDLP 283	N/A	Developers or Agents	Support	2. Vision and Strategic Objectives				Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 284	N/A	Developers or Agents	Support	3. Spatial Development Strategy				Yes	To make further comment or reiterate our comments in person

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Email	E.83	File B	Terance Butler Holdings	SDLP 285	N/A	Developers or Agents	* The plan needs to be sufficiently flexible to respond to and address the changes to the housing need or non-delivery of allocated sites within the plan period. * a suitable buffer has been allocated and windfalls appropriate	1. Overview	1.3 How the plan has been prepared			Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 286	N/A	Developers or Agents	* Support but the LA does need to take a pragmatic approach to BNG requirements. * Provide flexibility in the policy. * smaller sites of less than 50 should be exempt from 10% BNG or reduced and mitigation reduced	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 287	N/A	Developers or Agents	Policy addresses bespoke needs but the principles need to ensure flexibility in delivering a range and mix of dwellings that will be required for the whole demographic and specialist sectors.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 288	N/A	Developers or Agents	Affordable housing needs to be considered in the context of viability and delivery of housing to address the wider shortage and requirement.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 289	N/A	Developers or Agents	This policy provides a degree of assurance and certainty for SMEs to deliver housing.	6. Housing	6.11 Small sites and SME housebuilders	Policy T11: Small Sites and SME Housebuilders		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 290	N/A	Developers or Agents	Support policies S15	8. Retail and Town Centres	8.2 Town centres strategy	Policy S15: Town centres strategy		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 291	N/A	Developers or Agents	Support policies S16	8. Retail and Town Centres	8.3 Hierarchy of centres	Policy S16: Hierarchy of centres		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 292	N/A	Developers or Agents	Support policies S17	8. Retail and Town Centres	8.7 Chatham town centre	Policy S17: Chatham town centre		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 293	N/A	Developers or Agents	Support the principle, long term development aspiration and comprehensive redevelopment.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 294	N/A	Developers or Agents	TB own sites at Medway City Estate which are currently in employment use, but they need to be considered a alternative development opportunities if appropriate.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites		Yes	To make further comment or reiterate our comments in person
Email	E.83	File B	Terance Butler Holdings	SDLP 295	N/A	Developers or Agents	Support the vision. TBH own a site which is included on the Appendix D list at Pelican Reach (Plot L) - but it should be reiterated that, if existing sites are not fit for purpose or require to be significantly upgraded/enhanced to accommodate changes in processing/recycling or management, they should be relocated to more appropriate locations/facilities and redeveloped for alternative uses/opportunities to assist the delivery of economic, social and environmental objectives of the local plan	12. Waste Management	12.4 Safeguarding of existing waste management facilities	Policy T34: Safeguarding of existing waste management facilities		Yes	To make further comment or reiterate our comments in person.
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 581	N/A	Voluntary and Community Organisations	Local Plan allocations significantly exceed locally-supported growth scale and ignore need for infrastructure upgrades for the existing population.	10. Health, communities and infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 582	N/A	Voluntary and Community Organisations	Local plan fails DTC and is inconsistent with NPPF. It isn't legally compliant or sound as it is not based on proportionate evidence base. No formal engagement with Hoo St Werburgh and Chattenden Parish Council and lack of engagement with neighbouring LPAs	1. Overview	1.4 Duty to Cooperate				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 583	N/A	Voluntary and Community Organisations	Strategic allocations conflict with national planning policy with concerns about sustainability, environmental impact, infrastructure, education provision, transport, water, health and strategic allocations are requested to be removed.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 584	N/A	Voluntary and Community Organisations	Non compliance with the Hoo St Werburgh and Chattenden Neighbourhood Plan HOO4 (Housing Growth and Mix)	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 585	N/A	Voluntary and Community Organisations	Local plan doesn't comply with the strategic environmental assessment directive, nor does it assess reasonable alternatives and the Sustainability Assessment does not provide evidence of how environmental limits have influenced strategic choices	4. Natural Environment					

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Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 586	N/A	Voluntary and Community Organisations	The plan does not comply with Duty to Cooperate. The local plan consultation provided: - Minimal/reactive engagement with no formal engagement, - Lack of evidence base that neighbouring bodies agree with the development strategy, - Inadequate engagement with neighbouring LPAs, - Doesn't detail how unmet need will be addressed or show policy alignment or shared infrastructure plans, no evidence of statements of common ground (particularly relating to air quality, highways and ecological networks)	1. Overview	1.4 Duty to Cooperate				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 587	N/A	Voluntary and Community Organisations	Scale of housing proposed for Hoo is disproportionate to local needs and capacity.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 588	N/A	Voluntary and Community Organisations	Plan allocates land with no agreement with neighbouring authorities on how; traffic, air quality impacts, wastewater burden and SPA visitor pressure will be addressed.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 589	N/A	Voluntary and Community Organisations	Non compliance with the Hoo St Werburgh and Chattenden Neighbourhood Plan- HOO8 (Landscape and Environment) Strategic allocations degrade and remove sensitive valued natural landscapes and wildlife corridors (Chattenden Valley)	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 590	N/A	Voluntary and Community Organisations	Non compliance with the Hoo St Werburgh and Chattenden Neighbourhood Plan- HOO10 (Air Quality). The Plan does not secure adequate mitigation for worsening air pollution.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 591	N/A	Voluntary and Community Organisations	Non compliance with the Hoo St Werburgh and Chattenden Neighbourhood Plan- HOO11 (Transport and Active Travel) Local Plan proposes car-dependent development contrary to sustainable movement objectives in the Hoo Neighbourhood Plan.	9. Transport	9.3 Active travel interventions				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 592	N/A	Voluntary and Community Organisations	Environmental capacity of the estuary has not been cooperatively managed.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 593	N/A	Voluntary and Community Organisations	HRA has not assessed impacts of air quality which is not legally compliant.	4. Natural Environment	4.10 Air quality	Policy DM3: Air Quality			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 594	N/A	Voluntary and Community Organisations	SAMMS (strategic access management and monitoring strategy) mitigation is not demonstrably funded or agreed with Natural England.	4. Natural Environment					
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 595	N/A	Voluntary and Community Organisations	Spatial development strategy is overconcentrated on the rural peninsula, doesn't plan for infrastructure delivery and isn't support by environmental or community evidence.	3. Spatial Development Strategy					
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 596	N/A	Voluntary and Community Organisations	The plan allocates a large amount of housing requirement to the Hoo Peninsula without a transport strategy	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 597	N/A	Voluntary and Community Organisations	Hoo Peninsula has existing water, sewerage and education provision capacity deficits so concerned about further development without this infrastructure in place	4. Natural Environment	4.8 Flood and water management				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 598	N/A	Voluntary and Community Organisations	Contradicts the NPPF paragraph 36 (b) which requires appropriate strategy based on proportionate evidence and contradicts HOO4 and HOO11 of the Hoo St Werburgh and Chattenden Neighbourhood Plan which supports only small scale growth within infrastructural limits	1. Overview	1.3 How the plan has been prepared				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 599	N/A	Voluntary and Community Organisations	Sustainability appraisal fails to justify preferred strategy.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 600	N/A	Voluntary and Community Organisations	Plan is not consistent with paragraph 187-195 and the Hoo Peninsula growth strategy encroaches and impacts SPA's and SSSIs. The plan risks adverse air quality and impacts North Kent Marshes SPA, and includes sites bordering or containing ancient woodland, saltmarsh and high grade farmland	4. Natural Environment	4.7 Kent Downs National Landscape				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 601	N/A	Voluntary and Community Organisations	Plan is not consistent with NPPF paragraph 13 which requires that LPs reflect Neighbourhood plans.	1. Overview	1.3 How the plan has been prepared				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 602	N/A	Voluntary and Community Organisations	Plan contradicts national transport policy and is contrary to paragraph 109, 110 and 111 of the NPPF which requires development to be focused on locations that are, or can be made sustainable by public transport, as well as policy HOO11 of the Hoo St Werburgh and Chattenden Neighbourhood Plan, which mandates infrastructure before large scale growth	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 603	N/A	Voluntary and Community Organisations	Concern over no committed funding from national highways or central government, and no agreement with transport authorities, or delivery agencies, as part of the Infrastructure Delivery plan	9. Transport					

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Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 604	N/A	Voluntary and Community Organisations	The Medway Local Plan : • Fails to protect internationally and nationally designated ecological sites, • Relies on interim and insufficient environmental evidence, • Ignores adopted neighbourhood plan policies on biodiversity, landscape and natural infrastructure, • Directly conflicts with national planning policy and statutory environmental duties.	4. Natural Environment					
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 605	N/A	Voluntary and Community Organisations	Major Infrastructure failures with lack of confirmed delivery of new primary and secondary schools or healthcare expansion.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 606	N/A	Voluntary and Community Organisations	Strategic transport assessment confirms routes are already operating over capacity and projected housing delivery with no deliverable transport infrastructure and commitment from National Highways or Homes England renders the plans reliance on strategic Hoo Peninsula growth undeliverable and unsound. Concern regarding: •Lack of plans for a railway station, • Infrequent bus routes with lack of alignment with planned Local Cycling and Walking Infrastructure Plan priorities	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 607	N/A	Voluntary and Community Organisations	Concern over water supply and strategic growth leading to supply interruptions or pressure loss. The peninsula already suffers from sewage flooding and cannot accommodate large scale growth without upgrades.	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden	Policy SA8: Hoo St Werburgh and Chattenden			
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 608	N/A	Voluntary and Community Organisations	The plan does not address digital or energy resilience for future proof development and undermines the net zero vision and economic growth goals.	10. Health, communities and Infrastructure	10.6 Digital communications				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 609	N/A	Voluntary and Community Organisations	Fails to meet the presumption in favour of sustainable development as required by paragraph 11-16 of NPPF, the town country planning act 1990 and section 39 (2) of the planning and compulsory purchase act 2004 which requires that the purpose of planning is to contribute to the achievement of sustainable development. Non compliant with paragraph 13 and 15 NPPF	1. Overview	1.1 Introduction				
Email	E.119	File V	The Alliance of Hoo Peninsula Parishes	SDLP 610	N/A	Voluntary and Community Organisations	Non compliant with Paragraph 161-169 (Climate Change) - no net zero trajectory, car centric development.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change			
Email	E.77	File V	The City of Rochester Society	SDLP 230	N/A	Voluntary and Community Organisations	Brownfield sites should be prioritised, with stronger environmental safeguards and flood-risk measures. In addition developers must be held to their infrastructure and environmental commitments, with all decisions grounded in robust evidence.	3. Spatial Development Strategy	3.1 Overview			No	
Email	E.77	File V	The City of Rochester Society	SDLP 231	N/A	Voluntary and Community Organisations	Local environment policies need strengthening as it will be under more threat.	4. Natural Environment	4.2 Planning for climate change	Policy S1: Planning for climate change	Policy S1 - Local environment policies need strengthening		
Email	E.77	File V	The City of Rochester Society	SDLP 232	N/A	Voluntary and Community Organisations	Local environment policies need strengthening as it will be under more threat.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment	Policy S2 - Local environment policies need strengthening		
Email	E.77	File V	The City of Rochester Society	SDLP 233	N/A	Voluntary and Community Organisations	Local environment policies need strengthening as it will be under more threat.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites	Policy S3 - Local environment policies need strengthening		
Email	E.77	File V	The City of Rochester Society	SDLP 234	N/A	Voluntary and Community Organisations	Local environment policies need strengthening as it will be under more threat.	4. Natural Environment	4.5 Landscape protection and enhancement	Policy S4: Landscape protection and enhancement	Policy S4 - Local environment policies need strengthening		
Email	E.77	File V	The City of Rochester Society	SDLP 235	N/A	Voluntary and Community Organisations	Local environment policies need strengthening as it will be under more threat.	4. Natural Environment	4.6 Securing strong green and blue infrastructure	Policy S5: Securing Strong Green and Blue Infrastructure	Policy S5 - Local environment policies need strengthening	No	
Email	E.77	File V	The City of Rochester Society	SDLP 236	N/A	Voluntary and Community Organisations	The Plan's heavy housing targets lack Medway-specific scrutiny and risk unsustainable growth.	1. Overview	1.3 How the plan has been prepared			No	
Email	E.77	File V	The City of Rochester Society	SDLP 237	N/A	Voluntary and Community Organisations	The Plan makes no provision for new bridges or tunnels to link communities, despite similar schemes being considered elsewhere in UK. There is no exploration of tram systems as a low-carbon transport solution to serve the substantial new housing allocations, omitting these infrastructure options undermines the Plan's soundness and achieving a sustainable outcome.	9. Transport	9.1 Vision for access and movement in Medway			No	
Email	E.77	File V	The City of Rochester Society	SDLP 238	N/A	Voluntary and Community Organisations	Infrastructure—transport, utilities, schools, healthcare—must be upgraded before new development proceeds. Also suggests a new hospital should be a specific land use	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	
Email	E.77	File V	The City of Rochester Society	SDLP 239	N/A	Voluntary and Community Organisations	Concern raised over no reference in the plan to policing, provision for additional enforcement, police stations & jail places. Object on the grounds of soundness and whether some proposals in the draft Plan are justified and effective in achieving sustainable development	10. Health, communities and Infrastructure	10.5 Infrastructure delivery			No	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.77	File V	The City of Rochester Society	SDLP 240	N/A	Voluntary and Community Organisations	The Plan makes no provision for new bridges or tunnels to link communities, despite similar schemes being considered elsewhere in UK. There is no exploration of tram systems as a low-carbon transport solution to serve the substantial new housing allocations, omitting these infrastructure options undermines the Plan's soundness and achieving a sustainable outcome.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery				
Email	E.77	File V	The City of Rochester Society	SDLP 296	N/A	Voluntary and Community Organisations	Policy should foster complete communities via affordable diverse housing types for local people, reuse of empty homes, and specialist later-life dwellings.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing		No	
Email	E.77	File V	The City of Rochester Society	SDLP 297	N/A	Voluntary and Community Organisations	Policy should foster complete communities via affordable diverse housing types for local people, reuse of empty homes, and specialist later-life dwellings.	6. Housing	6.4 Supported housing, nursing homes and older persons accommodation	Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation		No	
Email	E.77	File V	The City of Rochester Society	SDLP 298	N/A	Voluntary and Community Organisations	Policy should foster complete communities via affordable diverse housing types for local people, reuse of empty homes, and specialist later-life dwellings.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix		No	
Email	E.77	File V	The City of Rochester Society	SDLP 299	N/A	Voluntary and Community Organisations	Sustainable transport and energy options (trams, waterways, e-scooters, solar power) need serious evaluation.	9. Transport				No	
Hard copy	H.62	File V	The Friends of the North Kent Marshes	SDLP 1868	N/A	Voluntary and Community Organisations	The Local Plan's housing scale threatens the North Kent Marshes through increased recreational disturbance, undermining conservation efforts and a UNESCO bid. SAMMS mitigation is insufficient. Infrastructure strain, lack of public assessments, and contradiction with environmental commitments render the plan unsound and environmentally damaging.	4. Natural Environment					
Email	E.37	File R	The Independent Group (TIG)	SDLP 106	N/A	MPs, Members and Parish Councils	No recent public mandate exists, the last meaningful consultation was over ten years ago and Medway Council has never independently assessed the airport's viability on its reduced, single-runway footprint or compared it to alternative mixed-use options.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Email	E.37	File R	The Independent Group (TIG)	SDLP 107	N/A	MPs, Members and Parish Councils	The NPPF provides a tangible and legally defensible basis for the LPA to reduce the overall scale, type and distribution of development within the plan area - including reducing residential allocations within a very environmentally sensitive and already very densely populated location. The plan risks adverse effects on the integrity of internationally protected sites (SPAs, Ramsar) - a policy constraint. The SA records major adverse residual effects on biodiversity, landscape and soil for the Hoo Peninsula growth area.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Email	E.37	File R	The Independent Group (TIG)	SDLP 108	N/A	MPs, Members and Parish Councils	Loss of agricultural land	7. Economic Development	7.8 Rural economy				
Email	E.37	File R	The Independent Group (TIG)	SDLP 109	N/A	MPs, Members and Parish Councils	Pollution concerns, development would irreversibly harm the intrinsic character of the peninsula and the settings of listed buildings and Conservation Areas. The plan risks adverse effects on the integrity of internationally protected sites (SPAs, Ramsar).	4. Natural Environment					
Email	E.37	File R	The Independent Group (TIG)	SDLP 110	N/A	MPs, Members and Parish Councils	Removing the development allocations around Chattenden, Hoo St. Werburgh, High Halstow and Kingsnorth on the environmentally sensitive Hoo Peninsula. The LPA can justify this approach because of the exceptional circumstances.	14. Site Allocations			Removing the development allocations around Chattenden, Hoo St. Werburgh, High Halstow and Kingsnorth on the environmentally sensitive Hoo Peninsula. The LPA can justify this approach because of the exceptional circumstances.		
Email	E.37	File R	The Independent Group (TIG)	SDLP 111	N/A	MPs, Members and Parish Councils	*Redistribute growth to urban vacant brownfield sites and lower-grade suburban sites. *Strengthen urban regeneration policies to secure higher densities in sustainable locations. *Retain only small-scale, locally supported rural growth in the Hoo Peninsula villages.	3. Spatial Development Strategy			Strengthen urban regeneration policies to secure higher densities in sustainable locations.		
Email	E.37	File R	The Independent Group (TIG)	SDLP 112	N/A	MPs, Members and Parish Councils	*Sustainability Appraisal also confirms there are potential adverse effects on the Hoo Peninsula's habitats from the scale of development proposed, and that the situation is currently uncertain. The LPA's spatial strategy is irrational and is in clear conflict with the evidence base and supporting documentation. The SA is not legally compliant with the SEA Regulations because: *It does not assess the full range of reasonable alternatives (specifically, a maximised urban / minimised rural strategy). *It downplays environmental harm from rural allocations despite its own evidence of major negative effects. *It relies on uncertain, unfunded mitigation. *It fails to assess cumulative cross-boundary effects in sufficient detail. *It does not ensure the public and statutory bodies had a	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal	*Re-run the SA with a fair and detailed assessment of the urban-maximisation alternative. *Quantify and cost mitigation measures, securing delivery before relying on them. *Reassess cumulative effects with up-to-date cross-boundary data. *Reconsult on the updated SA.		
Email	E.37	File R	The Independent Group (TIG)	SDLP 113	N/A	MPs, Members and Parish Councils	Habitats Regulations: The Plan fails to demonstrate "no reasonable scientific doubt" that adverse effects on European sites will be avoided, due to reliance on uncertain, unfunded, and uncommitted mitigation measures.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Habitats Regulation Assessment	Re-run Habitats Regulations Assessment with updated spatial options, secured mitigation measures, and a robust in-combination assessment with neighbouring authorities.		

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Email	E.37	File R	The Independent Group (TIG)	SDLP 114	N/A	MPs, Members and Parish Councils	Lack of DtC/SoCGs	1. Overview	1.4 Duty to Cooperate		Secure cross-boundary agreements and enter into binding SoCGs covering: *Long-term funding and delivery of SAMMS. *Joint transport infrastructure phasing and funding. *Housing redistribution within the Housing Market Area where environmental constraints require reduced growth in Medway Council's rural areas. * Wastewater capacity and nutrient mitigation strategies. "		
Email	E.37	File R	The Independent Group (TIG)	SDLP 115	N/A	MPs, Members and Parish Councils	Amend Local Plan policies to respect the Hoo St Werburgh & Chattenden Neighbourhood Plan's environmental and rural protection objectives.	4. Natural Environment			Amend Local Plan policies to respect the Hoo St Werburgh & Chattenden Neighbourhood Plan's environmental and rural protection objectives.		
Email	E.37	File R	The Independent Group (TIG)	SDLP 116	N/A	MPs, Members and Parish Councils	*Apply a minimum 400-metre buffer around all internationally and nationally designated habitat sites (including Special Protection Areas, Ramsar sites, Special Areas of Conservation, and Sites of Special Scientific Interest) on the Hoo Peninsula. *Remove all residential, mixed-use and new employment allocations on the Hoo Peninsula that fall within this minimum 400m exclusion zone. *Recognise that for particularly sensitive sites, wider buffers of 1km or more are common practice elsewhere in the UK and may be necessary to achieve legal compliance under the Habitats	4. Natural Environment	4.3 Conservation and enhancement of the natural environment		*Apply a minimum 400-metre buffer around all internationally and nationally designated habitat sites (including Special Protection Areas, Ramsar sites, Special Areas of Conservation, and Sites of Special Scientific Interest) on the Hoo Peninsula. *Remove all residential, mixed-use and new employment allocations on the Hoo Peninsula that fall within this minimum 400m exclusion zone. *Recognise that for particularly sensitive sites, wider buffers of 1km or more are common practice elsewhere in the UK and may be necessary to achieve legal compliance under the Habitats		
Email	E.37	File R	The Independent Group (TIG)	SDLP 117	N/A	MPs, Members and Parish Councils	*Remove or significantly reduce Hoo Peninsula allocations to a scale that can be shown, with certainty, not to adversely affect site integrity. *Secure binding agreements for SAMMS funding, transport measures, and wastewater upgrades before submission. *Re-run the HRA with updated mitigation certainty and a robust in-combination assessment.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Habitats Regulation Assessment	***Remove or significantly reduce Hoo Peninsula allocations to a scale that can be shown, with certainty, not to adversely affect site integrity. *Secure binding agreements for SAMMS funding, transport measures, and wastewater upgrades before submission. *Re-run the HRA with updated mitigation certainty and a robust in-combination assessment."		
Email	E.37	File R	The Independent Group (TIG)	SDLP 118	N/A	MPs, Members and Parish Councils	Infrastructure concerns- delivery is undermined by severe funding gaps, reliance on a single transport corridor, and absence of committed social infrastructure funding.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery		Provide costed, funded, and timetabled delivery plans for all strategic infrastructure linked to growth allocations, with clear accountability for each delivery partner.		
Email	E.40	File L	Theresa Elsey	SDLP 125	N/A	Members of the Public	Objecting to development on 'Rainham Orchards' on grounds of traffic congestion impact, access to A&E and GP/dentist.	14. Site Allocations	14.8 Capstone Valley	Policy SA7: Capstone Valley			
Email	E.40	File L	Theresa Elsey	SDLP 126	N/A	Members of the Public	Objecting to development on 'Rainham Orchards' and Capstone Valley on grounds of traffic congestion impact, access to A&E and GP/dentist.	14. Site Allocations	14.11 Lower Rainham	Policy SA10: Lower Rainham			
Online	1523	Online (OPUS)	Tonbridge and Malling Borough Council (Mr Bartholomew Wren, Principal Planning Officer) [1523]	4922	N/A	Statutory Bodies	Supports MC spatial strategy: Meets Development Needs to 2041 for housing, G&T and employment. It also supports regeneration, protects key landscape and avoids unsuitable sites, in particular site CHR4 (T&M support its exclusion due to risks of settlement coalescence). Coordinates Infrastructure Delivery: Requires development to mitigate impacts and contribute to infrastructure delivery.	3. Spatial Development Strategy					
Online	1523	Online (OPUS)	Tonbridge and Malling Borough Council (Mr Bartholomew Wren, Principal Planning Officer) [1523]	4923	N/A	Statutory Bodies	* Support Policy SA14 and the inclusion of the Innovation Park Medway. * Notes that while the development pipeline is sufficient, there is a shortage of built stock due to delays in delivering large, consented sites.	14. Site Allocations	14.15 Employment Sites	Policy SA14: Employment Sites			
Online	1523	Online (OPUS)	Tonbridge and Malling Borough Council (Mr Bartholomew Wren, Principal Planning Officer) [1523]	4924	N/A	Statutory Bodies	* Support for Monitor and Manage Approach * Funding and Delivery: Achieving transport goals will require a creative, coordinated approach to funding and delivery. * Notes that LCWIP active travel schemes are not yet fully integrated into the Local Plan and IDP. Integration is vital to secure funding and ensure delivery. * Riverside Path and Chatham Waters Line are supported and safeguarded under Policies T20 and DM16.	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation			

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Online	1523	Online (OPUS)	Tonbridge and Malling Borough Council (Mr Bartholomew Wren, Principal Planning Officer) [1523]	4925	N/A	Statutory Bodies	Tonbridge and Malling Borough Council supports Kent County Council's comprehensive improvement scheme for Blue Bell Hill (A229), including junctions with the M2 (Junction 3) and M20 (Junction 6). The scheme is needed to address combined impacts from the Lower Thames Crossing and growth in Medway and Maidstone. TMBC urges Medway Council to acknowledge the scheme's importance, commitment to ongoing collaboration, and supports full funding and implementation once the DfT approves the business case. Concerns that Medway's Local Plan does not make clear its position on this scheme. IDP has minimal content. There is a need for clear commitment. Medway Transport Model suggests minimal impact from the Local Plan, but TMBC argues this may reflect suppressed demand, not actual performance.	9. Transport	9.2 Monitoring and managing development	Paragraph 9.2.15	Clarity needs to be provided in the Local Plan text and IDP regarding the support of Medway Council for the Blue Bell Hill Improvement Scheme, and whether any of the site allocations proposed in the Plan have a material impact upon the performance of M2 junction 3, and its related roundabouts including Bridgewood, Taddington and Lord Lees. TMBC is currently concerned that this is underplayed due to the potential for S106 funding to be required from some site allocations. The text included at paragraph 9.2.15 suggests that this significant infrastructure project is required to support local growth, however further clarity is required regarding the extent to which the Medway Local Plan will contribute towards delivering this.	No	
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4450	N/A	Developers or Agents	N/A	Regulation 19 Consultation		Paragraph 1			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	N/A	Regulation 19 Consultation		Paragraph 2			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Support the principle of the policy - it must make it clear that contributions or mitigations will be sought on new schemes and not seek to potentially duplicate contributions.	4. Natural Environment	4.3 Conservation and enhancement of the natural environment	Policy S2: Conservation and Enhancement of the Natural Environment			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Support the principle of the policy - it must make it clear that contributions or mitigations will be sought on new schemes and not seek to potentially duplicate contributions.	4. Natural Environment	4.4. Sites of international importance for nature conservation	Policy S3: North Kent Estuary and Marshes Designated Sites			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Support	14. Site Allocations	14.12 Rural Settlements	Policy SA11: Site allocation (SR51)			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	The policy could go further specify that the Mixed-Use Community Hub, which is provided as part of MC/22/0254 on the approved Land Use Parameter Plan (Enclosure 5), as part of the Cliffe Neighbourhood Centre. The mixed-use community hub will provide all Local Residents with access to key services within a sustainable location of the village.	8. Retail and Town Centres	8.15 Shopping Parades and Neighbourhood Centres	Policy T18: Shopping parades and neighbourhood congregated Neighbourhood Centres			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Support for policy, however, the policy should show flexibility, in some cases, to ensure the viability of the development so that much need housing can be delivered. The housing mix should be reflective of the local needs evidence that as the need changes so does the housing mix provided.	6. Housing	6.2 Housing Mix	Policy T2: Housing Mix			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	In principle agree with Draft Policy T3, as schemes of 10 or more residential dwellings trigger the provision of affordable housing. Even though the site is located within the Hoo Peninsula, it is not an identified strategic site and forms part of the lower value area. the outline planning permission already provides 25% affordable housing which is secured by the s.106 for local residents first. Therefore, the site would already accord with the principles of the draft Policy T3.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Housing Land Supply and Delivery - support	3. Spatial Development Strategy					
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Criterion (a) and (b) are not entirely consistent with national policy, which recognises that publicly accessible open space 'can' contribute to visual amenity of an area. Criterion (a) implies that open space inherently contributes to visual amenity but in line with the NPPF it must be made clear that Visual Amenity must be confirmed through assessment. Therefore, the criterion would benefit from a redrafting that would simplify the policy tests.	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces			
Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Criteria F to I The current wording of the policy is not fully in line with paragraph 104 of the NPPF (2025) and places onerous requirements on applicants by applying criterion G and H concurrently when determining a planning application.	10. Health, Communities and Infrastructure	10.3 Open space, sport, recreation and play	Policy T28: Existing Open space, outdoor sport and play spaces			

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Online	1496	Online (OPUS)	Trenport Investments Ltd (Sean Molyneux) [1496]	4451 (attachments)	N/A	Developers or Agents	Draft Policy T3 relies upon the affordable housing mix to reflect the latest Local Housing Need Assessment. However, the first step in the alternative approach to affordable housing delivery sequence is a 'change in the tenure mix on site to facilitate delivery'. This would imply that even the most up to date Local Housing Need Assessment may not facilitate quick delivery of site-specific affordable housing. Therefore, the policy should be revised to enable applicants to submit their own evidence on Local Housing Need where schemes may depart from the Council's Latest Housing Need Assessment due to site-specific issues as this will speed up the delivery of affordable housing. General support for the approach to affordable housing in Policy T3 because the site accords with the principles in terms of percentage provision. However, affordable housing mix provision could be revised on a site-by-site basis to enable speedy delivery of affordable housing and avoid delays that could be caused by the delivery sequence alternative approach.	6. Housing	6.3 Affordable Housing	Policy T3: Affordable Housing	the policy should be revised to enable applicants to submit their own evidence on Local Housing Need where schemes may depart from the Council's Latest Housing Need Assessment due to site-specific issues as this will speed up the delivery of affordable housing.		
Email	E.147	File E	Uniper	SDLP 802	Stantec (Hardeep Hunjan)	Developers or Agents	Requests amendment to S11 to ensure suitable flexibility to recognise that energy related uses will be supported. Site also offers opportunities to potential for intensification for B2/B8/E(a)(iii) uses on brownfield land.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision			
Email	E.147	File E	Uniper	SDLP 803	Stantec (Hardeep Hunjan)	Developers or Agents	Strong support for plan focus on delivering employment land particularly through the re-use of existing brownfield allocations. Note that employment strategy does not fully align with findings of the ELNA which confirms that the existing employment land pipeline significantly exceeds identified demand. Support phasing inline with housing growth on Hoo Peninsula later in plan period.	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy			
Email	E.147	File E	Uniper	SDLP 804	Stantec (Hardeep Hunjan)	Developers or Agents	Note Kingsnorth Expansion Area is included as part of this strategy which also seeks to provide a potential location for the re-location of the businesses to facilitate potential future development at Medway City Estate.	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites			
Email	E.52	File T	University of Kent	SDLP 214	Savills (Jacob Ashford)	Other	The University welcomes the recognition made in the local plan to the contributions universities make in Medway. The continued support under the local plan ensures the University's operations within the Borough can be sustained and enhanced.	7. Economic Development	7.5 Learning and skills development	Paragraph 7.5.3			
Email	E.52	File T	University of Kent	SDLP 215	Savills (Jacob Ashford)	Other	The University is pleased to see changes made to the draft Local Plan following our previous representation to the Reg 18 consultation which took place in 2024. These changes include: Progression of a 'brownfield first' approach to deliver new housing and development in urban centres and waterfront locations under the Spatial Development Strategy. This will support the University through delivering high-quality placemaking on large areas of brownfield land surrounding Pembroke Campus and at the Historic Dockyard.	3. Spatial Development Strategy	3.1 Overview				
Email	E.52	File T	University of Kent	SDLP 216	Savills (Jacob Ashford)	Other	Pleased to see changes made to the draft Local Plan following our previous representation to the Reg 18 consultation which took place in 2024. These changes include: Revisions to Policy S14 . Suggested wording found within our previous representation has since been integrated into the policy wording which supports the University's position in Medway.	7. Economic Development	7.7 Culture and creative uses	Policy S14: Supporting Medway's culture and creative industries			
Email	E.52	File T	University of Kent	SDLP 217	Savills (Jacob Ashford)	Other	Pleased to see changes made to the draft Local Plan following our previous representation to the Regulation 18 consultation which took place in 2024. These changes include: Policy S17 The University relies in the Town Centre to satisfy local student and staff need in the absence of on Campus facilities for retail and leisure uses such as gyms and cafes. This is supported.	8. Retail and Town Centres	8.7 Chatham town centre	Policy S17: Chatham town centre			
Email	E.52	File T	University of Kent	SDLP 218	Savills (Jacob Ashford)	Other	The University requests that site allocation CCB25 (River Interface Land) is allocated as mixed-use, rather than as residential. Para 125 of the NPPF states that planning policies should encourage multiple benefits from both urban and rural land, including through mixed use schemes. It is considered that allocation CCB35 presents an opportunity to deliver multiple benefits (stated in full rep) through a mixed-use scheme complimentary to the University and wider Historic Dockyard.	14. Site Allocations	14.3 Heritage-led Sites	Policy SA2: Heritage-led Sites (Site CCB35)	The University requests that site allocation CCB25 (River Interface Land) is allocated as mixed-use, rather than as residential.		

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Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1789	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1790	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1791	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1792	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1793	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1794	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1795	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.52	File Q	Valerie Richardson	SDLP 1796	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.123	File C	Veetee Rice Ltd	SDLP 650	DHA (Seth Tyler)	Developers or Agents	Vision is contrary to requirements of NPPF as fails to identify the provision of housing .	2. Vision and Strategic Objectives	2.1 Vision			Yes	To discuss the legal compliance and soundness of the plan with specific reference to • The Duty to Cooperate; • Strategic Policies and Legal Tests; • Housing Supply and Delivery; • Site allocation SR53; and • Policy SA13 Frindsbury Peninsula Opportunity Area.
Email	E.123	File C	Veetee Rice Ltd	SDLP 651	DHA (Seth Tyler)	Developers or Agents	Prepared for a sustainable and green future - No strategic objective deals expressly with the amount of housing that needs to be delivered - nor employment growth in numerical forms required.	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 652	DHA (Seth Tyler)	Developers or Agents	Supporting people to lead healthy lives and strengthening our communities - needs to set out how much housing will be provided.	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 653	DHA (Seth Tyler)	Developers or Agents	Securing jobs and developing skills for a competitive economy - the lack of clarity in housing and employment growth in numerical forms required to meet local needs across the plan period must be expressed as an objective	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 654	DHA (Seth Tyler)	Developers or Agents	A blended strategy will need to include additional sites than those indicatively allocated as 'suburban expansion' and 'greenfield sites' to meet their objective to meet the objectively assessed need in full as set out in the national policy. The growing need for both market and affordable housing emphasises the need for the Council to plan to meet its full objectively assessed need. The Council should also work with Gravesham Borough Council to determine if it needs to and/or can accommodate any of its needs (up to 2,000 homes) to ensure the Plan is "Positively Prepared" (NPPF, para 35).	3. Spatial Development Strategy				Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 655	DHA (Seth Tyler)	Developers or Agents	Support for SGO3 blended strategy	3. Spatial Development Strategy				Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 656	DHA (Seth Tyler)	Developers or Agents	Boost pride in Medway through quality and resilient development - the objectives do not directly address the need to release brownfield land for urban regeneration as part of a combined strategy for meeting Medway's housing needs, including suburban expansion, rural development and Green Belt release. Objective is misleading.	2. Vision and Strategic Objectives	2.2 Strategic objectives			Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 657	DHA (Seth Tyler)	Developers or Agents	Amendment – extend Plan period by one year to 2042.	1. Overview	1.3 How the plan has been prepared		Extend plan period by one year	Yes	

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.123	File C	Veetee Rice Ltd	SDLP 658	DHA (Seth Tyler)	Developers or Agents	Policy SA13 - querying wording for criteria 1a.i) and 1a.ii) restricting any proposals in opportunity area before adoption of adoption of the Frindsbury Peninsula Planning Framework in 2030 /31.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	An initial phase of development of up to 690 1, 200 new homes within the plan period as part of a large-scale, mixed-use regeneration area. 1. i. To ensure a continuous supply of housing throughout the Plan period, the Council will support an early phase delivery of an initial phase of residential lead mixed use development which can include Sites SR30, SR31 and SR37 and other sites within the residential area of the Concept Plan independent of the Frindsbury Peninsula Planning Framework provided that : • The proposals provide appropriate Flood Risk Mitigation Strategy in accordance with Policy DM1 the Environment Agency Guidance ; and • The phase of development accords with the Council's initial Concept Plan and the proposals will not jeopardise future opportunities identified on the Frindsbury Peninsula	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 659	DHA (Seth Tyler)	Developers or Agents	Concerned over lack of clarity on timeframes, landownership issues. Policy needs to add clarity.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 660	DHA (Seth Tyler)	Developers or Agents	Querying capacity estimates in SA for sites SR30/31/37 which are lower than those provided in agents Reg 18 submission. Agent estimates 1000 unit capacity across three sites. However, the Plan in its current form has been demonstrated to be "Unsound" with reference to the NPPF (para 36)	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area	Amend site capacities	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 661	DHA (Seth Tyler)	Developers or Agents	Querying if sufficient replacement employment land to accommodate businesses relocating from MCE.	7. Economic Development	7.4 New employment sites	Policy S12: New employment sites		Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 662	DHA (Seth Tyler)	Developers or Agents	Querying reference to phasing of MCE sites and Veetee sites.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 663	DHA (Seth Tyler)	Developers or Agents	The requirement for "dementia friendly standards" is not specific and is already included in Policy T4 and Bellway would raise concerns regarding its inclusion. The requirement for M4 dwellings (Building Regulations) can be included as a standalone policy or within Policy T2 (Housing Mix), as this allows for dwellings which are adaptable to various living situations.	5. Built Environment	5.3 Housing design	Policy DM5: Housing Design	Remove text: Incorporate dementia friendly standards where appropriate	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 664	DHA (Seth Tyler)	Developers or Agents	Bullet point 6 is already covered by Policy S1 and should therefore be removed and not repeated. Furthermore, this is also now superseded by Building Regulations.	5. Built Environment	5.4 Sustainable design and construction	Policy DM6: Sustainable design and construction	Remove following bullet: Details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net zero carbon with due regard to Medway's current Climate Action Plan and Medway Council Corporate Strategies. The whole life cycle of a building should be considered. Where possible proposals for conversion or reuse of buildings will be favoured.	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 665	DHA (Seth Tyler)	Developers or Agents	Policy SA13 should include details on phased release of land.	14. Site Allocations	14.14 Frindsbury Peninsula Opportunity Area	Policy SA13: Frindsbury Peninsula Opportunity Area		Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 666	DHA (Seth Tyler)	Developers or Agents	Requires that proposals should be submitted in Full, where development lies within or may impact a Conservation Area. Notwithstanding, this requirement should be removed, there is no clear justification for this, and each application must be considered on its own merits having regard to the level of impact the development may or may not have on a Conservation Area.	5. Built Environment	5.8 Heritage assets	Policy DM9: Heritage Assets	Remove policy text: To help ensure the delivery of high-quality development and to be able to fully assess the impact of a development, proposals should be submitted as full applications when they are within, or would affect, a Conservation Area.	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 667	DHA (Seth Tyler)	Developers or Agents	Needs definition of what "materially lower" is. For the policy and the Plan to satisfy the requirements of the NPPF (para 16 d) to ensure it is deliverable and policies are clearly written, what is expected in terms of trips being "materially lower" must be defined. This policy needs to be cross referenced within IDP	9. Transport	9.2 Monitoring and managing development	Policy DM15: Monitoring and managing vehicle trip generation	As a minimum, development proposals for site allocations of 50 or more homes, or 5,000 sqm floorspace, will demonstrate how vehicle trip generation would be materially lower [definition required] than the vehicle trip credit set in the IDP.	Yes	
Email	E.123	File C	Veetee Rice Ltd	SDLP 668	DHA (Seth Tyler)	Developers or Agents	Higher and lower values need to be defined otherwise policy ambiguous and add text to Para 3 bullet 5.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Add text in brackets to Para 3 bullet 5: Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment."		
Email	E.123	File C	Veetee Rice Ltd	SDLP 670	DHA (Seth Tyler)	Developers or Agents	Reference to the need for self-build plots is dealt with as its own policy at Policy T9, therefore should be removed.	6. Housing	6.2 Housing mix	Policy T2: Housing Mix	Remove text: 'custom and self-build plots'.		
Email	E.123	File C	Veetee Rice Ltd	SDLP 671	DHA (Seth Tyler)	Developers or Agents	the sites at Kingsnorth and The Isle of Grain provide opportunities for the relocation of Industrial (E (g)(ii), E (g)(iii) (formerly B1b and B1c)) and warehouse (B8) uses to these locations to facilitate the regeneration of the Medway City Estate into a destination for residential led mixed-use development	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy	Add text to bullet 2: Industrial (E (g)(ii), E (g)(iii) (formerly B1b and B1c)) and warehouse (B8) uses will be located on the periphery of Medway close to the existing strategic road network on allocated sites at Kingsnorth and the Isle of Grain on the Hoo peninsular or any other allocated sites.		
Email	E.123	File C	Veetee Rice Ltd	SDLP 672	DHA (Seth Tyler)	Developers or Agents	Amendment required to take account of significant abnormal costs associated with developing brownfield sites, as this will be a common issue in the delivery allocated sites given that some 40% of all Plan-led housing is proposed using a brownfield first approach.	6. Housing	6.3 Affordable housing	Policy T3: Affordable Housing	Add text to second to last para: The Council acknowledge that brownfield sites have higher abnormal costs. Where there are high abnormal cost) a viability assessment in line with national policy and guidance should be submitted to the Council to be independently verified if the affordable housing proposed does not meet that which is required.		

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.123	File C	Veetee Rice Ltd	SDLP 673	DHA (Seth Tyler)	Developers or Agents	The policy is not clear if allocated sites and identified opportunity need to comply with this policy. If a site is allocated the Council have already considered it suitable, available and deliverable and therefore the policy 'should not bite' for site identified in the Plan. Also it is felt that a 12 month marketing period is considered excessive, given that under the General Permitted Development Order, the conversion of existing employment provision (offices) to residential development does not need a marketing period.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision	Add text in brackets to bullet point 1: Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where the site is not proposed as an allocation in the Local Plan if: . Amend reasonable marketing period from 12 to 6 months in bullet 3.		
Email	E.6	File A	Vidawood (Ian Drane)	SDLP 13	N/A	Business	Despite strong and justifiable opposition to proposed high scale development plans, the Council appears to continue to ignore the importance of Chatham port and the companies that provide vital employment and service to industries both imported and exported. There are many other more appropriate areas in the UK that meet this housing requirement and the Medway has to remain a crucial and valuable avenue to provide future employment and to service the import of material needed for large scale development.	3. Spatial Development Strategy					
Hard copy	H.58	File A	Village Store	SDLP 1848	N/A	Business	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hard copy	H.58	File A	Village Store	SDLP 1849	N/A	Business	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hard copy	H.58	File A	Village Store	SDLP 1850	N/A	Business	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.58	File A	Village Store	SDLP 1851	N/A	Business	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hard copy	H.58	File A	Village Store	SDLP 1852	N/A	Business	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hard copy	H.58	File A	Village Store	SDLP 1853	N/A	Business	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hard copy	H.58	File A	Village Store	SDLP 1854	N/A	Business	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hard copy	H.58	File A	Village Store	SDLP 1855	N/A	Business	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1713	N/A	Members of the Public	DTC provides Insufficient evidence of engagement on strategic cross-boundary issues.	1. Overview	1.4 Duty to Cooperate				
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1714	N/A	Members of the Public	Reg 18 and 19 consultation procedurally defective	1. Overview					
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1715	N/A	Members of the Public	Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1716	N/A	Members of the Public	The plan is non conformity with Hoo St Werburgh & Chattenden NP.	1. Overview	1.3 How the plan has been prepared				
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1717	N/A	Members of the Public	The Sustainability Assessment fails to legally satisfy SEA Directive	1. Overview	1.3 How the plan has been prepared	Evidence Base: Sustainability Appraisal			
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1718	N/A	Members of the Public	The Habitats Regulations Assessment is flawed in its methodology.	1. Overview	1.3 How the plan has been prepared	Evidence base: Habitats Regulation Assessment			
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1719	N/A	Members of the Public	The Infrastructure Delivery and monitoring evidence are legally inadequate.	1. Overview	1.3 How the plan has been prepared	Evidence Base: Infrastructure Delivery Plan			
Hoo Peninsula Campaign (Additional responses)	H.43	File Q	Wendy Murphy	SDLP 1720	N/A	Members of the Public	Query allocations on Hoo Peninsula and concern about insufficient infrastructure proposed, poor roads, and the impact on air quality, health and environment and loss of wildlife habitats	14. Site Allocations	14.9 Hoo St Werburgh and Chattenden				
Email	E.29	File L	William Mark	SDLP 89	N/A	Members of the Public	DTC - Insufficient evidence of engagement on strategic cross-boundary issues. Reg 18 and 19 consultation procedurally defective. Numerous policies non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan. Non conformity with Hoo St Werburgh & Chattenden NP. Local Plan conflicts with Neighbourhood Plan policies on infrastructure, landscape, community facilities and housing. SA fails to legally satisfy SEA Directive, HRA is flawed in its methodology. Infrastructure Delivery and monitoring evidence are legally inadequate. Querying allocations on Hoo Peninsula, insufficient infrastructure proposed, poor roads, concern over air pollution/quality and impact on health, impact on	1. Overview	1.4 Duty to Cooperate				

Source of Representation	Respondent ID	Full Representations	Respondent Name	Comment ID	Agent	Stakeholder Category	Officer Summary	Local Plan Main Section	Local Plan Sub-Section	Local Plan Policy/Paragraph	Suggested changes to plan	Appear at Examination	Reason
Email	E.20	File L	Yvonne Tatnall	SDLP 51	N/A	Members of the Public	Object to re-classifying green belt land behind Brompton Farm Road and Rede Court Road, Strood to grey belt land, does not believe it fulfils criteria and concerned on impact on wildlife	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.20	File L	Yvonne Tatnall	SDLP 52	N/A	Members of the Public	Concern over increased traffic from new development, combined with impact of Lower Thames Crossing, and resulting air pollution	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.20	File L	Yvonne Tatnall	SDLP 53	N/A	Members of the Public	Asks How will the dangerous gas pipeline be protected if development is allowed? Some local residents already are not allowed to build sheds, plant trees etc because of this pipeline	13. Energy	13.2 Energy supply			No	
Email	E.20	File L	Yvonne Tatnall	SDLP 54	N/A	Members of the Public	Requests reinstatement of Stonehorse Lane in its entirety, building a bridge over the link road, and a Park and play area – possibly near the bat area be added to the plan. Also requests all existing footpaths in the area be protected if building is allowed	14. Site Allocations	14.7 Strood West	Policy SA6: Strood West		No	
Email	E.20	File L	Yvonne Tatnall	SDLP 55	N/A	Members of the Public	Objects to plans to re-locate Medway City Estate to the Kingsnorth area. Suggests building the proposed 690 houses at Kingsnorth instead	7. Economic Development	7.2 Employment strategy	Policy S10: Economic Strategy		No	
Email	E.20	File L	Yvonne Tatnall	SDLP 56	N/A	Members of the Public	Concern over impact on infrastructure, particularly healthcare and sewage facilities. Suggests infrastructure be provided first, before housing.	10. Health, communities and Infrastructure	10.5 Infrastructure delivery	Policy S24: Infrastructure delivery		No	
Email	E.181	File J	Zurich Assurance Limited	SDLP 1161	Savills (Matthew Sobic)	Developers or Agents	Consider the policy is too rigid in terms of not permitting alternative uses that may support the sustainability of a wider employment area including ancillary facilities for employees of the employment area. Further, the policy does not reflect the new requirements of the NPPF Para 125 (c) that not only identifies the substantial value that should be attached to the re-use of brownfield land, but now confirms that where a proposal meets an identified need, it should be approved unless there is 'substantial harm' that arises from the proposal. Suggested changes.	7. Economic Development	7.3 Existing employment provision	Policy S11: Existing employment provision	Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where: • The existing use is proven to be no longer appropriate or viable. • There is no market interest in the in the site, and it has been marketed for a reasonable period (of 12 months). • The proposal would provide an ancillary of complementary facility that supports the wider operation of the employment area. • The proposal is on brownfield land and would meet an identified need, where the approval would not result in a substantial harm.		
Email	E.181	File J	Zurich Assurance Limited	SDLP 1162	Savills (Matthew Sobic)	Developers or Agents	Object to the introduction of a requirement to demonstrate trade draw of a proposal, in order to inform the sequential test. The policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17	8. Retail and Town Centres	8.4 Sequential assessment	Policy T15: Sequential assessment	Reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17		
Email	E.181	File J	Zurich Assurance Limited	SDLP 1163	Savills (Matthew Sobic)	Developers or Agents	Reviewed the methodology undertaken at Paragraph 5.58 – 5.82 of the Medway Retail and Town Centres Study 2025 that sets out a suggested justification for impact thresholds - The rationale for the approach reached in terms of the impact thresholds is not clear. Further, it isn't clear whether for retail use, these figures are GIA, GEA or net sales area. Adopting a GEA or GIA figure is rarely helpful and is not relevant to the consideration of impact as it does not reflect the area where retail goods are sold from.	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment			
Email	E.181	File J	Zurich Assurance Limited	SDLP 1164	Savills (Matthew Sobic)	Developers or Agents	Object to the Policy as it contains unnecessary duplication, but also ambiguity, and is therefore not consistent with NPPF paragraphs 16(d), 16(f) and 35(d).	8. Retail and Town Centres	8.6 Impact assessment	Policy T17: Impact Assessment			
Email	E.181	File J	Zurich Assurance Limited	SDLP 1165	Savills (Matthew Sobic)	Developers or Agents	The final paragraph refers to demonstrating sustainable travel choices under Policies DM18 and DM19. This is not relevant to an impact assessment policy, unnecessary duplication, and those policies will need to be complied with where relevant. Therefore, we object to the wording of the Policy on this basis	8. Retail and Town Centres	8.4 Sequential assessment	Policy T15: Sequential assessment			