



Medway Local Plan 2041

Regulation 22

Consultation Statement - Appendix 6

December 2025

[Medway.gov.uk/FutureMedway](https://www.medway.gov.uk/FutureMedway)



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Regulation 19 Consultation

This referred to the overview of the plan and many respondents used this as an opportunity to raise general comments. Although the matters relate to specific policies, the comments are captured under the specific sections.

1. Overview

General

131 representations have been received from the following consultees:

ID	Name	Stakeholder
4390	Mrs Sarah Malone	Members of the Public
4394-4396 4404-4406, 4397-4401, 4403,	Mrs Clare Marshall	Members of the Public
4420-4022, 4428	Mrs Lynne Barnes	Members of the Public
4475-4477	Mr Mark Hewer	Members of the Public
4708-4716	Miss Jackie Forrest	Members of the Public
4331, 4978, 4980 4983- 4985, 4987, 4990-4991	Ms Wendy Taylor	Members of the Public
4561-4562, 4565	Churches Together in Medway (Mr Stephen Bello, Chairman)	Members of the Public
4977, 4979	Mr Craig Grindley	Members of the Public
4495,96, 97	Mrs Elizabeth Poynter	Members of the Public
4687, 4689-4691	Mr Keith Harrison	Members of the Public
4387	Mr Nigel Skinner	Members of the public
4594	AC Goatham & Son	Members of the public
4656	Mr David Hopkins	Members of the public
4491, 4492	Mr Stephen Francis	Members of the Public
4624	CPRE Kent	Members of the Public
4681	Mrs Samantha Clarke	Members of the Public
4823	Mr James Broom	Members of the Public
4826	Mrs Paula Potter	Members of the Public
4965	Mrs Ann Blazeby	Members of the Public
4975	Mr James Winder	Members of the Public
4976	Mr Richard Bellingham	Members of the Public
H.10a-z	Hoo Peninsula Campaign Group	Members of the Public
H.12	Kevin Miller	Members of the Public
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
H.2	Brian Clark	Members of the Public

H.13	Deborah Jones	Members of the Public
E.56	Rob Sibley	Members of the Public
E.59	Paul Skues	Members of the Public
E.60	Mr HG and Mrs DR Kemsley	Developers or Agents
E.63	Carol Pires	Members of the Public
H.14	Mr & Mrs Thomson	Members of the Public
H.15	David & Elaine Leggatt	Members of the Public
E.69	Mervyn Wood	Members of the Public
E.80	Home Builders Federation (HBF)	Developers or Agents
E.103	Philip Badman	Members of the Public
E.105	Cyril Champness	Members of the Public
E.106	Hazel Champness	Members of the Public
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
H.16	M Shuter	Members of the Public
H.17	Sheila Hayward	Members of the Public
H.19	Michael O'Hanlon	Members of the Public
H.20	S O'Hanlon	Members of the Public
H.21	John Rigby	Members of the Public
H.22	S L Farrow	Members of the Public
H.23	Eric Bishop	Members of the Public
H.24	Michael White	Members of the Public
H.25	Carol Driver	Members of the Public
H.26	Christopher Carr & Hilary Hosoman	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public
H.29	Christine Peek	Members of the Public
H.30	Steven Muspratt	Members of the Public
H.31	Meryl Laphorn	Members of the Public
H.32	D A Laphorn	Members of the Public
H.33	Russell Lister	Members of the Public
H.34	N J Miller & C D Miller	Members of the Public
H.35	Daphne Fritter	Members of the Public
H.36	M T Dennison	Members of the Public
H.37	Donald Baulk	Members of the Public
H.63	Rochester Eco-Hub	Voluntary and Community Organisations
H.38	Marilyn Stone	Members of the Public
H.39	John Drake	Members of the Public
H.40	Mr & Mrs Hooker	Members of the Public
H.41	Kaitlan Murphy	Members of the Public
H.42	Stephen Murphy	Members of the Public
H.43	Wendy Murphy	Members of the Public
H.44	Anna Cole	Members of the Public
H.45	Linda & Shaun Soules	Members of the Public
H.46	J Prenezek	Members of the Public
H.47	Brian & Iris Rickford	Members of the Public

H.48	David & Nina Weatherley	Members of the Public
H.49	D & H Sellwood	Members of the Public
H.7	David Rutt	Members of the Public
H.8	Professor Anan Shetty	Members of the Public
H.50	Angela Turner	Members of the Public
H.51	Lynda Collins	Members of the Public
H.52	Valerie Richardson	Members of the Public
H.53	Peter Richardson	Members of the Public
H.54	Lisa Choppen	Members of the Public
H.58	Village Store	Business
H.55	Stefan Davis	Members of the Public
E.127	Friends of Deangate Ridge Country Park Committee	Voluntary and Community Organisations
E.161	Peel Waters	Developers or Agents
E.200	Save The Hoo Peninsula Campaign (STHP)	Voluntary and Community Organisations
E.201	Rt Hon Kelly Tolhurst	Members of the public
H.57	Marie Calvert	Members of the Public

Support

Representations 4331, 4394, 4395, 4397, 4398, 4399, 4400, 4401, 4403, 4404, 4405, 4406, 4420, 4421, 4422, 4495, 4496, 4497, 4561, 4562, 4565, 4594, 4656, 4687, 4689, 4690, 4691, 4708, 4709, 4711, 4712, 4713, 4714, 4715, 4716, 4977, 4978, 4979, 4983, 4984, 4985, 4987, 4991, E.60, E.63 and E.161 support the overview. Health concerns feature prominently, with calls for investment in gyms, dietary education, and improved healthcare access, alongside opposition to high-density housing due to lack of privacy and community. Environmental and climate resilience issues are repeatedly highlighted, including rising sea levels, flood protection, sewage and water infrastructure upgrades, energy efficiency, and sustainable building standards such as solar panels and heat pumps. Respondents stress the need to protect biodiversity, avoid building on wildlife-designated areas, and integrate habitat creation during construction.

Transport and infrastructure are major concerns, with unreliable buses, fragile road networks, and parking pressures noted, alongside requests for improved bus services and additional crossings from the Hoo Peninsula. Economic issues include a lack of local career opportunities, particularly in skilled sectors, and calls for business development to retain talent. Housing comments emphasize a mix of stock, retrofitting for energy efficiency, and provision for vulnerable groups, including young people with disabilities and homeless individuals.

There is strong opposition to development in sensitive areas such as Hoo Peninsula, Allhallows, and Capstone Valley, citing loss of green space, wildlife impact, and inadequate infrastructure. Other points include improving consultation, safeguarding national environmental designations, and ensuring climate change ambitions are met.

Issues:

- 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 (4387).
- Concern over level of growth proposed on Hoo Peninsula and overpopulation of villages. Support for protection, for example Deangate Golf Course (4390).
- Nature must be valued equally with people when making decisions that impact environment. Prioritising short-term politics harms biodiversity, prompting Medway's climate emergency (4396).
- Support for more services but queries how achievable delivery of services (4428).
- 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 (4475).
- 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 (4476).
- 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 increase of housing numbers (4477).
- 'It is a Plan for Medway as its own place.' This is badly worded (4491).
- Comment on global and western climate change sceptics (4492).
- 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 integration with policy references (4624).
- Concerns about pollution, loss of greenspace, and inadequate health infrastructure; fears about mental health impacts from large-scale construction (4681).
- Concerned single adults, people with mobility issues and car users aren't considered (4710).
- Strongly objects to climate change measures (4823).
- Disagrees that development will increase employment (4826).
- Objection and querying infrastructure delivery to match housing numbers, loss of open space, green spaces and impact on wildlife (4965).
- 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. (4975).

- Opposed to allocation in greenbelt and loss of agricultural land. Concern over impact climate etc. (4976).
- Querying what is meant by needs of diverse communities and how this affects types of infrastructure delivered (4980).
- Against new residential development and supports repurposing existing stock (4990).
- LP proposals will negatively affect quality of life (E.59).
- 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 ease of reference in reports, planning applications and supporting statements (E.69).
- 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 (E.80).
- Fails to meet the presumption in favour of sustainable development as required by paragraph 11-16 of NPPF, the Town and 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 (E.106).
- Asserts that emerging Neighbourhood Plans should not override strategic site allocations. Strategic planning is the responsibility of the Local Planning Authority (E.119).
- Diversity Impact Assessment (DIA) is insufficient to demonstrate compliance with the Public Sector Equality Duty (PSED) (E.127).
- NPPF paragraph 11(b)(i) has not been robustly considered (E.200).
- Numerous policies are non-compliant with NPPF legal obligations including treatment of Neighbourhood Plan (H.10a-z).
- The plan is non-conformity with Hoo St Werburgh & Chattenden NP (H.10a-z).
- Reg 18 and 19 consultation procedurally defective (4387, E.59, E.105, E.106, E.127, H.2, H.7, H.8, H.10a-z, H.12, H.13, H.14, H.15, H.16, H.17, H.19, H.20, H.21, H.22, H.23, H.24, H.25, H.26, H.27, H.28, H.29, H.30, H.31, H.32, H.33, H.34, H.35, H.36, H.37, H.38, H.39, H.40, H.41, H.42, H.43, H.44, H.45, H.46, H.47, H.48, H.49, H.50, H.51, H.52, H.53, H.54, H.55, H.57 and H.58).
- Disregard of the Hoo St Werburgh & Chattenden Neighbourhood Plan, which had strong public support (H.12).
- 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 (H.13).
- Would like to ask the council to include article 4 direction in the future planning policy for Medway (H.15).
- Rochester Eco-Hub urges sustainable, inclusive planning aligned with NPPF and UN goals and stresses legal compliance (H.37).

Response:

The Council supports some modifications to strengthen policy wording. The Council has prepared an Infrastructure delivery Plan and various topic paper to provide clarity on issues raised.

How the plan has been prepared

305 representations have been received from the following consultees:

ID	Name	Stakeholder
4692	Mr Keith Harrison	Members of the public
4895	Kitesfield Estates Limited	Developers or Agents
4882 (E.117)	Nightingale Homes Ltd	Developers or Agents
4717, 4818, 4721, 4722, 4719, 4720	Miss Jackie Forrest	Members of the public
4363	Mr Andrew Millar	Members of the Public
4407, 4408	Mrs Clare Marshall	Members of the Public
4426	Mrs Lynne Barnes	Members of the Public
4435	Mrs Jayne Dunn	Members of the Public
4478	Mr Mark Hewer	Members of the Public
4498,4499	Mrs Elizabeth Poynter	Members of the Public
4566	Churches Together in Medway (Mr Stephen Bello, Chairman)	Voluntary and Community Organisations
4563, 4568	Mr Phil Worton	Members of the Public
4792, 4795, 4847, 4850, 4851, 4852	Mrs Gillian Mulloy	Members of the Public
E.9	Keith Bell	Members of the Public
E.24	Alison Wells	Members of the Public
E.25	Robert Wells	Members of the Public
E.26	NHS Property Services (NHSPS)	Statutory Bodies
E.32	Michael McEvoy	Members of the Public
E.33	Katherine Baird	Members of the Public
E.38	Joe Fallarino	Members of the Public
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.49	Kent SME Network	Developers or Agents
E.53	Kelvin Carr	Members of the Public
E.59	Paul Skues	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.80	Home Builders Federation (HBF)	Developers or Agents
E.83	Terance Butler Holdings	Developers or Agents

E.84	Diocese of Rochester	Developers or Agents
E.85	National Highways	Statutory Bodies
E.93	Berengrave Lane 2 Ltd	Developers or Agents
E.105	Cyril Champness	Members of the Public
E.106	Hazel Champness	Members of the Public
E.110	NHS Kent and Medway	Statutory Bodies
E.114	Churchill Living and McCarthy Stone	Developers or Agents
E.116	Blue Harbour Investment Ltd	Developers or Agents
E.118	Gleeson Land	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
E.123	Veetee Rice Ltd	Developers or Agents
E.124	National Grid	Statutory Bodies
E.127	Friends of Deangate Ridge Country Park Committee	Voluntary and Community Organisations
E.128	Louise Putnam	Members of the Public
E.132	Allhallows Parish Council	MPs, Members and Parish Councils
E.133	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.134	Esquire Developments (Rainham Parkside Village)	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.150	Mr Kevin Rice	Developers or Agents
E.152	Gladman	Developers or Agents
E.153	Maidstone Borough Council	Statutory Bodies
E.154	Arcelor Mittal Kent Wire	Business
E.156	HRF Properties Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.170	Richborough	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.172	Mr Richard Castle	Developers or Agents
E.176	Homes England (Chattenden Barracks)	Developers or Agents
E.178	Halling Parish Council	MPs, Members and Parish Councils
E.180	Nick Dowling	Members of the Public

E.184	Hoo Consortium	Developers or Agents
E.185	Homes England (Lodge Hill Camp)	Developers or Agents
E.186	Brookworth Homes	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.192	Frindsbury Extra Parish Council	MPs, Members and Parish Councils
E.200	Save The Hoo Peninsula Campaign (STHP)	Voluntary and Community Organisations
E.204	Kent County Council	Statutory Bodies
H.2	Brian Clark	Members of the Public
H.7	David Rutt	Members of the Public
H.8	Professor Anan Shetty	Members of the Public
H.10a-z	Hoo Peninsula Campaign Group	Members of the Public
H.11	J Holyoak	Members of the Public
H.12	Kevin Miller	Members of the Public
H.13	Deborah Jones	Members of the Public
H.14	Mr & Mrs Thomson	Members of the Public
H.15	David & Elaine Leggatt	Members of the Public
H.16	M Shuter	Members of the Public
H.17	Sheila Hayward	Members of the Public
H.19	Michael O'Hanlon	Members of the Public
H.20	S O'Hanlon	Members of the Public
H.21	John Rigby	Members of the Public
H.22	S L Farrow	Members of the Public
H.23	Eric Bishop	Members of the Public
H.24	Michael White	Members of the Public
H.25	Carol Driver	Members of the Public
H.26	Christopher Carr & Hilary Hosoman	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public
H.29	Christine Peek	Members of the Public
H.30	Steven Muspratt	Members of the Public
H.31	Meryl Laphorn	Members of the Public
H.32	D A Laphorn	Members of the Public
H.33	Russell Lister	Members of the Public
H.34	N J Miller & C D Miller	Members of the Public
H.35	Daphne Fritter	Members of the Public
H.36	M T Dennison	Members of the Public
H.37	Donald Baulk	Members of the Public
H.38	Marilyn Stone	Members of the Public
H.39	John Drake	Members of the Public
H.40	Mr & Mrs Hooker	Members of the Public
H.41	Kaitlan Murphy	Members of the Public
H.42	Stephen Murphy	Members of the Public

H.43	Wendy Murphy	Members of the Public
H.44	Anna Cole	Members of the Public
H.45	Linda & Shaun Soules	Members of the Public
H.46	J Prenezek	Members of the Public
H.47	Brian & Iris Rickford	Members of the Public
H.48	David & Nina Weatherley	Members of the Public
H.49	D & H Sellwood	Members of the Public
H.50	Angela Turner	Members of the Public
H.51	Lynda Collins	Members of the Public
H.52	Valerie Richardson	Members of the Public
H.53	Peter Richardson	Members of the Public
H.54	Lisa Choppen	Members of the Public
H.55	Stefan Davis	Members of the Public
H.57	Marie Calvert	Members of the Public
H.58	Village Store	Business
H.61	Reform UK	MPs, Members and Parish Councils

Support

Representations 4895, 4566,4717,4718,4721, 4499,4692, 4722, E.49 support this policy.

Supporting comments to this section spanned a number of themes including: brownfield first approach (to protect farming land), need for social cohesion, integration of housing and business, high street viability, Chatham regeneration and housing supply.

Issues:

- Inaccessible/ineffective public consultation (4407, 4478, 4563,4847, 4850).
- Extend plan period (E.80, E.116, E.150, E.170).
- Additional allocations required to meet full housing requirement (E.156, E.170, 4882).
- Housing buffer should be larger (E.150, E.170, 4882).
- Infrastructure delivery incl. utilities ahead of development (4408).
- Greenbelt policy and NPPF compliancy (4426).
- Against housing development (4435, 4498).
- Querying demographic/housing projections (4568).
- Querying windfall sites (4719).
- Querying [housing] buffer size – should be smaller (4720).
- Querying findings of ELNA (4792).
- Querying use of interim environmental assessments (4795).
- Querying validity of evidence base (4850, E.170).
- Access to full evidence base (4852).
- Local Plan supports developers not general public (4847, E.53).
- Querying detail of standard method in calculating housing need (4851).
- Policy covering housing requirement (E.143).
- Querying climate change (4363).

Response:

This section of the Local Plan document received a fair number of objections in relation to a wide range of procedural type issues – consultation, allocation of sites, plan period as well as a number of general comments in terms of the content and access to the evidence base. Para.

Other (Blanks)

Support

Representations E.49, E.83, E.124 and E.133 support this policy and Medway's approach to preparing the Local Plan, welcoming its progress after years of uncertainty and endorsing the vision for Medway 2041, including recognition of Grain for economic development. It encourages extending the plan period to at least 2041/42 to ensure compliance with the required 15-year timeframe post-adoption and recommends flexibility to address changes in housing need or non-delivery of sites, supported by suitable buffers and windfall allowances. Additionally, it suggests considering evidence for housing requirements above minimum needs to meet growth ambitions and improve infrastructure delivery, while aligning closely with Neighbourhood Plans for local relevance.

Issues:

- Local residents feel excluded as developer meetings occurred before public consultations, raising concerns about transparency and council responsiveness (E.9).
- Reg 18 and 19 consultation is procedurally defective and numerous policies are non-compliant with NPPF legal obligations and is in non-confirming with the Hoo Neighbourhood Plan (H.2, H.7,H.8, H.11, H.12, H.13, H.14, H.15, H.16, H.17, H.19, H.20,H.21,H.22,H.23,H.24,E.24,H25,E.25,H.26,H.27,H.28,H.29,H.30,H.31,H.32,H.33,H.34,H.35,H.36,H.37,H.38,H.39,H.40,H.41,E.41,H.42,H.43,H.44,H.45,H.46,H.47,H.48,H.49, H.50,H.51,H.52,H.53,H.54,H.55,H.57, H.58, E.59, E.119, E.127, E.132).
- Feels the Local Plan is rushed with limited consultation time, withheld information, and restricted meaningful public engagement (E.32).
- Many promises (noise reduction, improved safety) have gone unfulfilled, no cross-council agreements has been published, undermining transparency and legal compliance (E.38).
- Consultation during peak summer holidays limits accessibility and engagement; extension and clear response process for communities like Strood North requested (E.53).
- The plan is considered unsound due to unjustified housing supply, ignoring assessed needs, and failing to meet NPPF-compliant requirements, creating a shortfall of at least 400–625 homes (E.80).
- Objects to Medway's windfall supply estimates, citing inflated prior notification figures, recommending realistic averages to avoid shortfalls of 125–786 homes over the plan period (E.80).
- Housing needs shortfall over plan period. Wrong year as start year – inconsistent to approach needed for assessing housing need (E.80).

- 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 (E.119).
- The plan period should be extended by one year to 2042 (E.123, E.134, E.152).
- Regulation 19 consultation was reduced to a minimum - Legal compliance (E.132).
- Further work is needed to clarify if uplift is needed, against infrastructure need/cost which can be tested via SA (E.134).
- Recommend a common approach across policies to provide clarity as only some policies include specific reference to avoiding or mitigating environmental impacts (E.148).
- Level of housing supply not sound. Supply will not cover extended period- windfall supply overestimated (E.152).
- Housing supply shortfall of 625 units (E.152).
- Unclear what non-strategic policies are and the status of the thematic policies (if they are strategic or non-strategic) as required by the NPPF (E.153).
- Greater buffer is needed due to historic under-delivery. Concerns over double-counted sites and lack of evidence require additional allocations and clarification (E.156).
- 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) (E.165).
- 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 (E.172).
- Medway's plan aims for 24,540 homes but provides an inadequate 1% buffer, relying heavily on complex, back-loaded strategic sites without meaningful contingency for under-delivery (E.176).
- Medway should adjust their housing projections to take into account national policy (E.184).
- Avoiding unnecessary additional layers of requirements that risk delaying delivery of development and add further burden to the information requirements (E.184).
- Policy wording is overly long and unclear; needs numbered points, sub-points, and relocation of explanatory text for clarity and usability (E.184).
- Object to non-allocation of site HHH1 and believes the Local Plan is unsound as a result (E.185).
- 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 (E.200).
- Lack of signed statements of common ground and unresolved strategic issues shows no clear implementation mechanism, breaching NPPF paragraph 28 requirements (E.200)
- 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 (E.200)
- Lack of transparency & public consultation and seems as though the local plan has been rushed with a short consultation period and no voice to raise concerns (H.61).
- Housing target level risks unsustainable growth (E.77).

Evidence base: Infrastructure Delivery Plan

ID	Name	Stakeholder
E.24	Alison Wells	Members of the Public
E.25	Robert Wells	Members of the Public
E.49	Kent SME Network	Developers or Agents
E.59	Paul Skues	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.105	Cyril Champness	Members of the Public
E.106	Hazel Champness	Members of the Public
E.128	Louise Putnam	Members of the Public
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.156	HRF Properties Limited	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.192	Frindsbury Extra Parish Council	MPs, Members and Parish Councils
H.2	Brian Clark	Members of the Public
H.7	David Rutt	Members of the Public
H.8	Professor Anan Shetty	Members of the Public
H.10a-z	Hoo Peninsula Campaign Group	Members of the Public
H.11	J Holyoak	Members of the Public
H.12	Kevin Miller	Members of the Public
H.13	Deborah Jones	Members of the Public
H.14	Mr & Mrs Thomson	Members of the Public
H.15	David & Elaine Leggatt	Members of the Public
H.16	M Shuter	Members of the Public
H.17	Sheila Hayward	Members of the Public
H.19	Michael O'Hanlon	Members of the Public
H.20	S O'Hanlon	Members of the Public
H.21	John Rigby	Members of the Public
H.22	S L Farrow	Members of the Public
H.23	Eric Bishop	Members of the Public
H.24	Michael White	Members of the Public
H.25	Carol Driver	Members of the Public
H.26	Christopher Carr & Hilary Hosoman	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public
H.29	Christine Peek	Members of the Public
H.30	Steven Muspratt	Members of the Public
H.31	Meryl Lapthorn	Members of the Public
H.32	D A Lapthorn	Members of the Public

H.33	Russell Lister	Members of the Public
H.34	N J Miller & C D Miller	Members of the Public
H.35	Daphne Fritter	Members of the Public
H.36	M T Dennison	Members of the Public
H.37	Donald Baulk	Members of the Public
H.38	Marilyn Stone	Members of the Public
H.39	John Drake	Members of the Public
H.40	Mr & Mrs Hooker	Members of the Public
H.41	Kaitlan Murphy	Members of the Public
H.42	Stephen Murphy	Members of the Public
H.43	Wendy Murphy	Members of the Public
H.44	Anna Cole	Members of the Public
H.45	Linda & Shaun Soules	Members of the Public
H.46	J Prenezek	Members of the Public
H.47	Brian & Iris Rickford	Members of the Public
H.48	David & Nina Weatherley	Members of the Public
H.49	D & H Sellwood	Members of the Public
H.50	Angela Turner	Members of the Public
H.51	Lynda Collins	Members of the Public
H.52	Valerie Richardson	Members of the Public
H.53	Peter Richardson	Members of the Public
H.54	Lisa Choppen	Members of the Public
H.55	Stefan Davis	Members of the Public
H.57	Marie Calvert	Members of the Public
H.58	Village Store	Business

Support

Representation E.49 supports the Evidence Base: Infrastructure Delivery Plan and has requested clarification on IDP content, particularly contributions required and that infrastructure can be delivered and support the level of growth planned.

Issues:

- *All other representations on this objected, the most common reasons were:*
- **Legal adequacy of Infrastructure Delivery & Monitoring evidence** — The IDP and monitoring framework are seen as vague and legally inadequate (including references to Reg 19/NPPF para 35), with widespread concern across public and several E submissions. (E.24, E.25, E.59, E.105, E.106, E.128, H.10a-z, H.2, H.7, H.8, H.11, H.12, H.13, H.14, H.15, H.16, H.17, H.19, H.20, H.21, H.22, H.23, H.24, H.25, H.26, H.27, H.28, H.29, H.30, H.31, H.32, H.33, H.34, H.35, H.36, H.37, H.38, H.39, H.40, H.41, H.42, H.43, H.44, H.45, H.46, H.47, H.48, H.49, H.50, H.51, H.52, H.53, H.54, H.55, H.57, H.58).
- **Flood risk and defence omissions in the IDP** — Required flood defence works from the Level 2 Strategic Flood Risk Assessment are not fully reflected; costs/deliverability may be underestimated; TE2100 and defence plans between Cliffe and the Isle of Grain are not referenced. (E.68)

- **Missing link between housing trajectory and infrastructure delivery; funding gaps** — Lack of evidence that housing can be delivered in step with infrastructure; significant funding gaps identified in the IDP/viability appraisal. (E.143, E.166, E.167)
- **Alternative site proposals to ensure timely, funded delivery** — Calls to allocate additional unconstrained greenfield locations to support infrastructure and affordable housing (e.g., Land East of Mierscourt Road, Rainham; Land South of Moor Street; land to the east of Gillingham). (E.156, E.166, E.167)
- **Viability concerns with heavy brownfield reliance and S106 contributions** — Brownfield sites may struggle to meet viability thresholds, limiting full S106 contributions and undermining infrastructure delivery. (E.167)
- **Strategic site delivery risks and delay factors** — Complex masterplanning and multi-landowner coordination (e.g., Hoo Peninsula) risk delays, including potential Grampian conditions. (E.167)
- **Affordable housing shortfall risk** — Annual need outstrips likely delivery where brownfield schemes provide low affordable housing percentages (around 10%), weakening the plan's vision. (E.167)
- **Process improvement: ongoing IDP updates with key stakeholders** — Suggest annual IDP updates with direct Network Rail input to maintain alignment on transport infrastructure needs. (E.164)
- **Service capacity and funding clarity** — Infrastructure is already overstretched with unclear funding for services, compounding delivery risks. (H.27)

Response:

The Council has prepared an Infrastructure Delivery Plan and Developer Contributions Guide.

Evidence base: other

Support

The following representations support this policy.

- **Evidence general** - Incomplete evidence, IDP to reflect NHS developer guide (E.178).
- **Employment Land Needs Assessment** - a number of amendments requested to quoted floorspace, lettings, planning use classes and floorspace permissions (E.161).
- **Heritage Asset Review** – support with minor amendments (E.204).
- **Land Availability Assessment** – support with minor amendments in reference Planning Use Classes (E.161).
- **Landscape Character Assessment** – Support with request for amendment to a specific landscape character area (E.93).
- **Strategic Transport Assessment:**
 - Support for transport related evidence following consultation (E.85).
 - Querying a number of quoted figures and Pier Road Gyratory (E.161).
 - Suggestion to incorporate model shifts to Local Plan for greater growth to meet need of area and unmet need (E.190).
 - Support with suggestions of amendments to Monitor and Manage Strategy and transport assessments for certain routes (E.204).
- **Viability Assessment:**

- Request for clarification of details in the IDP, contributions required to support the delivery of infrastructure required to support level of growth (E.49).
- Support for parts of document with queries relating to a number of other sections (E.161).

Issues:

- **Evidence general:**
 - evidence documentation is incomplete (E.132).
 - evidence base incomplete and does not support strategies (E.190).
- **Employment Land Needs Assessment** – not reflecting adequately the contribution of the docks and the role of retaining port and specialist manufacturing. (E.154).
- **Greenbelt assessment:**
 - object to some of the assessments of sites (E.84).
 - Chapter Farm – grey belt status – suggestion that site can be bought forward in isolation (E.165).
- **Land Availability Assessment:**
 - request for specific site status to be amended (E.171).
 - recommendation for inclusion of a policy to include trajectory as shown in LAA (171).
 - evidence report contradicts housing need identified in Reg 19 LP (E.190).
- **Viability Assessment:**
 - Request for re-run of older persons housing typology costings as part of revised study (E.143).
 - concern raised over ‘significant identified infrastructure funding gaps’ in VA and IDP (E.143).
 - commenting on occupiers Reg18 comments by land owner (E.161).
 - concerns raised over the planning obligations sought with no evidence or justification (E.165).
 - Full evidence base update and finalisation (E.171).
 - Querying specific site capacity and level of affordable housing required (E.186).
 - Querying S106 contribution required for specific site linked to Policy SA10 (E.190).
 - Requesting further consultation to discuss health figures quoted in VA (E.26).

Response:

The council have prepared the various evidence base and provided updates where possible in topic papers.

Duty To Cooperate

95 representations have been received from the following consultees:

ID	Name	Stakeholder
4382	Mr Stephen Hubbard	MPs, Members and Parish Councils
4723 - 4724	Miss Jackie Forrest	Members of the public
4648, 4668	Mr Kevin Smith	Members of the Public

4682	Mrs Samantha Clarke	Members of the public
4796, 4797, 4853	Mrs Gillian Mulloy	Members of the Public
E.9	Keith Bell	Members of the Public
E.19	Claire Glover	Members of the Public
H.10a-z	Hoo Peninsula Campaign Group	Members of the Public
H.11	J Holyoak	Members of the Public
E.29	William Mark	Members of the Public
H.12	Kevin Miller	Members of the Public
E.35	Carl Dunks	Members of the Public
E.37	The Independent Group (TIG)	MPs, Members and Parish Councils
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.53	Kelvin Carr	Members of the Public
H.2	Brian Clark	Members of the Public
H.13	Deborah Jones	Members of the Public
E.59	Paul Skues	Members of the Public
H.14	Mr & Mrs Thomson	Members of the Public
H.15	David & Elaine Leggatt	Members of the Public
E.80	Home Builders Federation (HBF)	Developers or Agents
E.85	National Highways	Statutory Bodies
E.98	John Leigh and Shirley Leigh	Members of the Public
E.105	Cyril Champness	Members of the Public
E.106	Hazel Champness	Members of the Public
E.116	Blue Harbour Investment Ltd	Developers or Agents
E.118	Gleeson Land	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
H.16	M Shuter	Members of the Public
H.17	Sheila Hayward	Members of the Public
H.19	Michael O'Hanlon	Members of the Public
H.20	S O'Hanlon	Members of the Public
H.21	John Rigby	Members of the Public
H.22	S L Farrow	Members of the Public
H.23	Eric Bishop	Members of the Public
H.24	Michael White	Members of the Public
H.25	Carol Driver	Members of the Public
H.26	Christopher Carr & Hilary Hosoman	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public
H.29	Christine Peek	Members of the Public
H.30	Steven Muspratt	Members of the Public
H.31	Meryl Lapthorn	Members of the Public
H.32	D A Lapthorn	Members of the Public
H.33	Russell Lister	Members of the Public
H.34	N J Miller & C D Miller	Members of the Public
H.35	Daphne Fritter	Members of the Public
H.36	M T Dennison	Members of the Public

H.37	Donald Baulk	Members of the Public
H.38	Marilyn Stone	Members of the Public
H.39	John Drake	Members of the Public
H.40	Mr & Mrs Hooker	Members of the Public
H.41	Kaitlan Murphy	Members of the Public
H.42	Stephen Murphy	Members of the Public
H.43	Wendy Murphy	Members of the Public
H.44	Anna Cole	Members of the Public
H.45	Linda & Shaun Soules	Members of the Public
H.46	J Prenezek	Members of the Public
H.47	Brian & Iris Rickford	Members of the Public
H.48	David & Nina Weatherley	Members of the Public
H.49	D & H Sellwood	Members of the Public
H.7	David Rutt	Members of the Public
H.8	Professor Anan Shetty	Members of the Public
H.50	Angela Turner	Members of the Public
H.51	Lynda Collins	Members of the Public
H.52	Valerie Richardson	Members of the Public
H.53	Peter Richardson	Members of the Public
H.54	Lisa Choppen	Members of the Public
H.58	Village Store	Business
H.55	Stefan Davis	Members of the Public
E.126	Boxley Parish Council	MPs, Members and Parish Councils
E.127	Friends of Deangate Ridge Country Park Committee	Voluntary and Community Organisations
E.128	Louise Putnam	Members of the Public
E.129	Bredhurst Parish Council	MPs, Members and Parish Councils
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.155	Mr Zammit and Mr Jhalli	Developers or Agents
E.156	HRF Properties Limited	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.170	Richborough	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.179	Paul Butcher	Members of the Public
E.186	Brookworth Homes	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.191	Gravesham Borough Council	Statutory Bodies
E.200	Save The Hoo Peninsula Campaign (STHP)	Voluntary and Community Organisations
H.61	Reform UK	MPs, Members and Parish Councils
H.56	A C Driver	Members of the Public
H.57	Marie Calvert	Members of the Public

Support

Representations 4723, 4724 E.80 , E.85, E.186 and E.191 support this subsection. Respondents emphasise the need for continued collaboration, particularly with Tonbridge and Malling Borough Council, to address cross-border development and housing needs. This ongoing cooperation may necessitate a partial review of the Local Plan in the future.

Transport infrastructure is highlighted as a priority, with calls for improved roads in the area. Medway Council's active engagement with National Highways on strategic road network matters is acknowledged, and there are no objections regarding legal compliance or the duty to cooperate on these issues. A separate Statement of Common Ground is requested between Gravesham Borough Council and Medway to formalize joint working arrangements.

Supporters welcome the commitment to joint working on cross-boundary matters, including housing, employment, transport, infrastructure, education, and environmental considerations. They note that Medway's Regulation 19 consultation precedes Gravesham's clarification of its development needs, and they appreciate the consideration given to Gravesham's unmet housing need within the Sustainability Appraisal.

Issues:

- Concern that the final versions of the Duty to Cooperate report and Statements of Common Ground have not been published (4668) (E.37, E.122, E.143, E.150, E.155, E.165, 4853) and should be updated and finalised before submission (E.122, E.171) or made available for consultation before proceeding to examination (E.116).
- Concerns about the Duty to Cooperate process and transparency (E.19, E.35, E.44, E.53, E. 56, E.98, E.126, E.128, E.129, E.179, E.190)
- Insufficient evidence of engagement on strategic cross-boundary issues and potential non compliance (E29, E.119, E127, E129, E.170, 4796, E.59, E.105, E.106 H.2, H.13, H.14, H.15, H.10a-z, H.11, H.12, H.16 H.17, H.19, H.20, H.21, H.22, H.23, H.24, H.25, H.26, H.27, H.28, H.29, H.30, H.31, H.32, H.33, H.34, H.35, H.36, H.37, H.38, H.39, H.40, H.41, H.42, H.43, H.44, H.45, H.46, H.47, H.48, H.49, H.7, H.8, H.50, H.51, H.52, H.53, H.54, H.58 and H.55, H.57)
- Number of representations in relation to concerns on the strategic allocation to the west of Strood. Concerns about the impact of the development (4382, 4797) are linked to comments on failure on Duty to Cooperate with Gravesham Borough Council on this cross border strategic location (4648, 4797, E53).
- More specific comments on this location include misuse of duty to cooperate to release Green Belt to the west of Strood (4648), and decisions premature before the publication of the Gravesham BC local plan (E9). Seek more information on engagement (E.53)
- Lack of certainty on unmet housing needs from neighbouring LPAs and how these should be addressed in Medway's plan (4797, E.118, E.122, E.143, E.155. E156
- No clear strategy for meeting unmet housing needs from neighbouring authorities or demonstrating ability to satisfy Medway's own need without harmful side-effects (E.129).

- 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 (E.126)
- Concerns raised in relation to cross border cooperation with Tonbridge and Malling in relation to a promoted site at Holborough/Halling - Consideration of this site should have been captured in section 3 of the DtC – 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 (E.157)
- Concerns raised in relation to cross border impacts in the Capstone/Lidsing area - 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. (E.126)
- 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 issues affecting Boxley Parish (E.126).
- Joint environmental management is lacking, especially around the Kent Downs National Landscape and nearby ancient woodlands (E.129).
- Issues of engagement with Hoo St Werburgh and Chattenden as a Parish Council and not complying with its adopted Neighbourhood Plan (E.29, E.44, E.119, E.200)
- Concerns about the impacts of cross border developments (E.200)

Response:

The Council has continued to engage through the Duty to Cooperate up to Submission. It has discussed representations submitted by the prescribed bodies. An updated Duty to Cooperate Report and Statements of Common Ground have been prepared.

2. Vision and Strategic Objectives

Vision

21 representations have been received from the following consultees:

ID	Name	Stakeholder
4479	Mr Mark Hewer	Members of the Public
4500	Mrs Elizabeth Poynter	Members of the Public
4423	Mrs Lynne Barnes	Members of the Public
4570	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4625	CPRE Kent	Voluntary and Community Organisations
4757	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4799	Mrs Gillian Mulloy	Members of the Public

4917	Ms Nikki Cagan	Members of the Public
4927	Barratt David Wilson Homes	Developers or Agents
E.5	Cllr George Perfect	MPs, Members and Parish Councils
E.47	Esquire Developments	Developers or Agents
E.49	Kent SME Network	Developers or Agents
E.85	National Highways	Statutory Bodies
E.123	Veetee Rice Ltd	Developers or Agents
E.148	Natural England	Statutory Bodies
E.150	Mr Kevin Rice	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.204	Kent County Council	Statutory Bodies
H.12	Kevin Miller	Members of the Public
H.57	Marie Calvert	Members of the Public

Support

Representations 4500, 4570, 4757, 4927, E.47, E.49, E.85, E.148, E.157 and E.204 support this policy. Respondents seek clearer details on the location of community-owned energy infrastructure and the source of figures for reducing car use. There is concern that the vision does not explicitly commit to conserving and enhancing the Kent Downs National Landscape, which may conflict with LURA requirements. Comments also highlight the need to prioritise less harmful development sites away from sensitive biodiversity areas. While housing is acknowledged, its role in delivering infrastructure, green spaces, health improvements, and economic growth is underrepresented, and there is a missed opportunity to support SME developers for faster delivery. The plan period requires adjustment to align with national policy, starting from 2025/26 and extending to 2041/42, with clarity on housing need- approximately 26,176 homes over the period. Suggestions include referencing connections to adjacent boroughs to improve strategic alignment and completing the Medway Heritage Strategy urgently, integrating it into decision-making and master planning. Additionally, a heritage and climate risk survey is recommended to inform future actions.

Issues:

- 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 (4479).
- 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 (4423).
- Supports the vision. Asks is the strategy sufficiently clear in terms of addressing climate change, strengthening natural assets or that housing and economic needs are met (4625).
- 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 (4799).

- Car travel is essential and car users cannot be dismissed, making people use buses or walk is impractical (4917).
- 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 (E.5).
- Vision is contrary to requirements of NPPF as fails to identify the provision of housing (E.123).
- 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 (E.150).
- 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 (E.184).
- Concern about impacts to wildlife habitats (H.12).
- The Infrastructure Delivery and monitoring evidence are legally inadequate (H.57).

Response:

The Council supports a modification to the plan to identify housing provision. An updated Infrastructure Delivery Plan and Monitoring Framework have been prepared.

Strategic Objectives

22 representations have been received from the following consultees:

ID	Name	Stakeholder
4347	Mr Stuart Hofford	Members of the Public
4928	Barratt David Wilson Homes	Developers or Agents
4627 - 4628	CPRE Kent	Voluntary and Community Organisations
4694, 4696 - 4697	Mr Keith Harrison	Members of the public
4758	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4982, 4986	Mr Craig Grindley	Members of the Public
4725	Miss Jackie Forrest	Members of the public
4896	Mrs Gillian Mulloy	Members of the Public
4506, 4507	Mr Kevin Smith	Members of the Public
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.123	Veetee Rice Ltd	Developers or Agents
E.132	Allhallows Parish Council	MPs, Members and Parish Councils
E.150	Mr Kevin Rice	Developers or Agents

E.154	Arcelor Mittal Kent Wire	Business
E.170	Richborough	Developers or Agents
E.178	Halling Parish Council	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

Representations 4928, 4694, 4696, 4758, 4982, 4697, 4725, 4986, 4506, 4507 E.132, E.178 and E.204 support this policy. Respondents highlighted the need to consider climate change impacts, particularly rising sea levels, and requested an areas-at-risk map to inform planning decisions. There were warnings about the effect of climate change on farmland, with calls to avoid building on agricultural land and to adopt sustainable building standards such as the Future Homes Standard. Concerns were expressed about the potential health impacts of planned growth, the loss of countryside and woodland, and the need for development to focus on urban brownfield sites rather than rural expansion. Some comments questioned the local need for housing and stressed the importance of including homeless people in housing plans, alongside providing adequate infrastructure and accessible parking. While the strategic ambition is supported, inconsistencies were noted, such as proposals to declassify parts of the Green Belt and change land use at Chatham Docks, which appear contrary to the stated objectives. The County Council welcomed the sub-objective on securing Medway's historic environment and suggested referencing Historic England guidance on heritage's role in climate change mitigation and adaptation. They also emphasised that energy efficiency improvements should apply to existing buildings, not just new ones, and highlighted heritage's contribution to health and well-being.

Issues:

- Concern over use of green areas, green belt and agricultural fields and negative impact (4347).
- 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 (4627).
- Objectives should have a greater emphasis on developing brownfield land over greenfield land. 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 (4628).
- 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. No credible strategy exists for reusing Medway's hundreds of vacant homes or retrofitting substandard housing. The Plan lacks support for preserving older homes or incentivising traditional materials, unlike subsidies for new builds (4698).
- 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 (E.44).

- 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 (E.123).
- Supporting people to lead healthy lives and strengthening our communities - needs to set out how much housing will be provided (E.123).
- 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 (E.123).
- 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 (E.123).
- 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). 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). 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 (E.150).
- Medway Council have failed to consider the contribution of Chatham Docks to their strategic objectives. 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 (E.150).
- Strategic objective 2: Supporting people to lead healthy lives - objective needed for housing needs met in full E.170).

Response:

The Council supports a modification to the plan to identify housing provision.

3. Spatial Development Strategy

113 representations have been received from the following consultees:

ID	Name	Stakeholder
4332 - 4333	Mrs Stella Tiller	Members of the Public
4480	Mr Mark Hewer	Members of the Public
4698 - 4699	Mr Keith Harrison	Members of the public
4935	Mr Kevin Boyd	Members of the Public
4988, 4992- 4993	Mr Craig Grindley	Members of the Public
5021 - 5022	Mr Lincoln Ritchie	Members of the Public

4558	Mr Tony Osborne	Members of the Public
4760 - 4762	Kent Downs AONB/NL Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4629, 4630, 4631, 4632	CPRE Kent	Voluntary and Community Organisations
4634, 4635, 4636, 4637, 4638, 4669, 4671, 4672	Mr Kevin Smith	Members of the Public
4811, 4812, 4866	Mrs Gillian Mulloy	Members of the Public
4937, 4938	Mr Kevin Boyd	Members of the Public
4451 (attachments)	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents
4599	AC Goatham & Son	Developers or Agents
4898	Kitesfield Estates Limited	Developers or Agents
4929	Barratt David Wilson Homes	Developers or Agents
E.5	Cllr George Perfect	MPs, Members and Parish Councils
E.6	Vidawood (Ian Drane)	Business
E.9	Keith Bell	Members of the Public
E.12	Sue Self	Members of the Public
E.35	Carl Dunks	Members of the Public
E.37	The Independent Group (TIG)	MPs, Members and Parish Councils
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.45	Chatham Historic Dockyard Trust	Voluntary and Community Organisations
E.52	University of Kent	Other
E.60	Mr HG and Mrs DR Kemsley	Developers or Agents
E.62	Telereal Securitised Property GP Limited	Developers or Agents
E.65	P Sharp	Members of the Public
H.3	N.B. Chapman	Members of the Public
E.76	Abbey Developments	Developers or Agents
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.80	Home Builders Federation (HBF)	Developers or Agents
E.82	St John's College	Developers or Agents
E.83	Terance Butler Holdings	Developers or Agents
E.93	Berengrave Lane 2 Ltd	Developers or Agents
E.118	Gleeson Land	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
H.19	Michael O'Hanlon	Members of the Public

H.20	S O'Hanlon	Members of the Public
H.24	Michael White	Members of the Public
H.25	Carol Driver	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public
H.29	Christine Peek	Members of the Public
H.59	High Halstow & St Mary Hoo Parish Council	MPs, Members and Parish Councils
E.123	Veetee Rice Ltd	Developers or Agents
E.124	National Grid	Statutory Bodies
E.125	Mr and Mrs R Goatham	Developers or Agents
E.138	Dean Lewis Estates (Cliffe Woods)	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.162	Kitewood Estates Limited	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.170	Richborough	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies
H.61	Reform UK	MPs, Members and Parish Councils
H.57	Marie Calvert	Members of the Public
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents

Support

Representations 4698, 4935, 4988, 5022, 4993, 4761 (E.95), 4451 (1496), 4599, 4762, 4898, 4929, 5021, E.52, E.60, E.62, E.82, E.83, H.59, E.123, E.124, E.125, E.161, E.162, E.204 support this policy.

A wide range of issues were raised in support of the Spatial Development Strategy: use of blended approach, use of brownfield land while noting higher costs, delivery of infrastructure while observing environmental sensitivities, development of smaller sites as allocations, safeguarding of land for rail growth, high quality place making, meeting housing need in full on brownfield and greenfield sites, expansion of Chatham Docks allocation, support for allocations on the Hoo Peninsula and support for use of brownfield sites with archaeological assessments and Conservation Area Appraisals.

Issues:

- Querying choice of allocations (E.76, E.119, E.122, E.143, E.150, E.157, E.167, H.61).
- Querying spatial plan evidence (E.122, E.143, E.150, E.157, E.167, E.170).
- Lack of housing requirement policy (E.80, E.167, E.184, E.168).
- Need for clearer and more information relating to housing supply/Plan trajectory (E.118, E.143, E.177, E.184, E.168).
- General lack of infrastructure (4634, 4811, 4812, E.12, E.44, H.3, E.119).
- Querying use of greenbelt/greenbelt review evidence/ no exceptional circumstances (4635, 4636, 4638, 4671, 4672, 4937, 4938, E.9, H.57).
- Ecological impact of development (4629, 4699, 4811, E.12, E.35, E.77, H.57).
- (Concern over brownfield use leading to) Loss of jobs at Chatham Docks/erosion of heritage/business relocation risk (4637, E.5, E.6, E.65, H.19, H.20, H.24, H.25, H.27, H.28, H.29).
- Reliance on greenfield sites/support for brownfield site use (4629, 4669, 4812, E.35, E.37, E.45, H.3, E.77, E.118).
- Loss of BMV agricultural land (4630, 4634, 4811, 4938, E.9).
- Against allocations in Hoo (4630, 4631, E.5, E.37, H.61, H.57).
- Urbanising of Medway disparity/distribution of growth (4333, E.41, E.44, E.119).
- Concern over delivery of sites especially in first 5 years (E.80, E.118, E.167).
- Remove reference to strategic gap in key diagram (E.143, E.167, E.168).
- Concern over traffic/highway congestion (4558, E.12, H.3).
- Need alternatives to car dependency/model shift hook/sustainable transport options needed for zero carbon/ zero emission buses (4630, 4631, 4812).
- Better use of DtC (4672, E.150).
- Protect open space (4630, E.12).
- Flood risk (4699, E.77).
- Lack of reference to Fast Track (4630, 4631).
- Impact of development on air quality and public health (4992, H.3).
- Protection of heritage assets (E.45).
- Densities not compliant with National Design Code (4630).
- Lack of detail on transport infrastructure (4632).
- Better connection between development and railway corridors (E.164).
- Design to include crime prevention measures (4811).
- Lack of public engagement (4811).
- Lack of address for skills deficit/education infrastructure (4866).
- Secure higher densities in sustainable urban locations (E.37).
- Supply of affordable housing linked to infrastructure contributions (E.80).
- Key diagram amendment in relation to specific site – with site not being shown as development site residential as wrongly marked in strategic gap (E.93).
- Lack of support for small sites (E.122).
- Cost of delivering brownfield development (E.138).
- Insufficient use to greenfield to allow flexibility in delivery (E.190).
- Removing land safeguarded for potential railway station due to lack of evidence (E.177).
- Support for reuse of empty homes over greenfield site use (4332).
- Including environmental designations (e.g. KDNL) in key diagram (4760).

- Description of 'extensions to the North of Rainham as suburban rather than greenfield (4480).

Response:

A wide range of issues were raised to the Spatial Strategy most notably issues around the choice of site allocations and associated evidence, evidence around housing supply, the need for a housing supply policy, concerns over allocating sites in greenbelt, potential negative impacts for development and subsequent impacts on existing infrastructure.

Policies Maps

18 representations have been received from the following consultees:

ID	Name	Stakeholder
4383	Mr Stephen Hubbard	MPs, Members and Parish Councils
4626	CPRE Kent	Voluntary and Community Organisations
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.45	Chatham Historic Dockyard Trust	Voluntary and Community Organisations
E.51	Endeavour Gillingham Limited	Other
E.113	Dickens' Country Protection Society	Voluntary and Community Organisations
E.124	National Grid	Statutory Bodies
E.126	Boxley Parish Council	MPs, Members and Parish Councils
E.137	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.153	Maidstone Borough Council	Statutory Bodies
E.161	Peel Waters	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.202	Friends of Broomhill	Voluntary and Community Organisations

Support

Representations E.171 and E.202 supported the policies maps. The first generally supported the inclusion of their site on the policies map and the second supported the maps overall but request an amendment to mark open spaces and environmental designations around Strood.

Issues:

- Inconsistent terminology used between maps, needs to be user friendly, not compliant with SCI (4626).

South East Map

- Amend map for specific allocation to change 'residential' to 'mixed use' (E.45).
- Map needs town centre boundary added and primary shopping areas (E.51).
- Request for map amendment to include specific sites (E.150).
- Querying safeguarded areas for transport scheme M2/J4 which have been included in key but not been included on map (E.153).

South West map

- Errors with policies map - with a number of amendments suggested (4383).
- Remove three allocations from map due to objection on grounds of greenbelt/loss of agricultural land (E.113).
- Include Hempstead Valley Shopping Centre to District Centre designation (E.126, E.153).
- Amend map to include suggested leisure designations at Chatham Docks Basin 3 (E.161).
- Amend map to remove designations which affect allocated sites (amend policy) - i.e. waste facility site(s) at Chatham Docks (E.161).

North East map

- Amend map so that 'existing employment areas' includes all of Grain LNG facility to recognise its national significance for energy infrastructure. Additionally amendment to include an area as grey close to jetties. Should areas with planning permission be included to show extent of site? (E.124).

North West map

- Map does not reflect gap between Hoo and Chattenden (E.44).
- Querying site in close proximity to Hoo Village Centre being in defended flood plain rather than Flood Zone 2 (E.137).
- Removing safeguarded transport land as already shown in figure 14 (E.177, E.184).

Response:

A relatively small number of objections were raised in relation to the policies maps. A number requested changes in relation to specific sites or generally greater detail to add clarity and readability.

4. Natural Environment

S1: Planning for Climate Change

23 representations have been received from the following consultees:

ID	Name	Stakeholder
4482	Mr Mark Hewer	Member of public
4501 - 4502	Mrs Elizabeth Poynter	Member of public
4538	Blueberry Homes	Developers or Agents
4592	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4673	Mrs Ruth Dyke	Member of public
4941	Mr Kevin Boyd	Member of public
E.68	Environment Agency	Statutory Bodies
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
E.124	National Grid	Statutory Bodies
E.148	Natural England	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.195	Mr & Mrs RM Gollay	Member of public
E.204	Kent County Council	Statutory Bodies
H.60	High Halstow Parish Council	MPs, Members and Parish Councils
H.63	Rochester Eco-Hub	Voluntary and Community Organisations

Support

Representations 4501, 4502, 4592 and 4673 support this policy. Representations 4501 and 4502 support the policy and state more available water for active use is needed, suggests incorporating grey water systems and rainwater harvesting methods into standard housing design. Representation 4592 supports Policy S1 which is in line with NPPF para 136. Representation 4673 supports the policy but is concerned developing at Rainham on fruit growing land and removal of trees is contrary to Policy S1. E.68 supports the policy overall but suggests minor wording amendments and strengthening the Effective spatial planning and placemaking part and Adaption to climate change part of the policy. Strengthening the supporting text around SuDS and prioritising this as a first option is also suggested. E.104 supports the policy but suggests 4 additions: Retrofitting homes, EV charging provision, zero emission buses and solar on new homes. E.117 generally supports the policy. H.60 supports the

Plan's 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. E.124 supports this objective and considers that making best use of brownfield land is vital in terms of delivery of strategically important sites. E.148 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 and the use of nature based solutions. E.171 supports the policy. E.204 supports the policy, suggests a typographical error is corrected in paragraph 4.2.1 and believes some of the wording could be strengthened and made clearer in the policy.

Issues:

- 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. Suggests removing SA10, Lower Rainham, from the Local plan. (4482)
- 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. (4538)
- Concern raised over water supply and need for reservoirs (4941).
- Policy wording needs strengthening (E.77)
- Non-compliant with NPPF Paragraph 161-169 (Climate Change) - no net zero trajectory, car centric development. (E.119)
- Supportive of ambition, but criticises lack of clarity, enforceability, and integration with other policies. Suggests a number of recommendations including 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 (E.122)
- 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. (E.157)
- Concerned with cost of bus improvements and improving bus patronage to Hoo (E.184)
- Recommend that the entire policy is redrafted with appropriate and deliverable requirements that can be incorporated into a development proposal (E.190)
- Recommends stronger, explicit adaptive measures within site allocation policies to increase development resilience to climate risks. (E.195)
- Urge climate adaptation, brownfield development, and protecting biodiversity. Asks that plan seeks further environmental protection. (H.63)

Response:

The Council notes that modifications may strengthen the policy wording.

S2: Conservation and Enhancement of the Natural Environment

41 representations have been received from the following consultees:

ID	Name	Stakeholder
4451	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents

ID	Name	Stakeholder
4535	Ms Georgina Kosanovis	Member of public
4571, 4578	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4591	Mrs Ann Buttle	Member of public
4593	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4622	CPRE Kent	Voluntary and Community Organisations
4764, 4765	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4802	Mrs Gillian Mulloy	Member of public
4890	Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx, Chair)	Voluntary and Community Organisations
E.37	The Independent Group (TIG)	MPs, Members and Parish Councils
E.58	Stephen Dyke	Member of public
E.67	Kent Wildlife Trust	Voluntary and Community Organisations
E.68	Environment Agency	Statutory Bodies
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.83	Terance Butler Holdings	Developers or Agents
E.95	Kent Downs National Landscape	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.112	D Bennett	Member of public
E.117	Nightingale Homes	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.128	Louise Putnam	Member of public
E.130	Linda & Antonio Riordan	Member of public
E.144	E Butcher	Member of public
E.148	Natural England	Statutory Bodies
E.153	Maidstone Borough Council	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.175	RM Gollay	Member of public
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.189	Rob Gilbert	Member of public
E.204	Kent County Council	Statutory Bodies
H.5	Linda Atkinson	Member of public
H.22	S L Farrow	Member of public
H.26	Christopher Carr & Hilary Hosoman	Member of public
H.27	M Wellard	Member of public
H.29	Christine Peek	Member of public
H.30	Steven Muspratt	Member of public
H.33	Russell Lister	Member of public

Support

Representations 4451, 4535, 4571, 4578, 4593, 4765, E.58, E.68, E.83, E.117, E.153, E.171 and E.204 support this policy.

Representation 4451 supports the principle of the policy but it must make it clear that contributions or mitigations will be sought on new schemes and not seek to potentially duplicate contributions.

4535 supports the policy but has concern over impact of development on wildlife and querying effectiveness of BNG. Representation 4571 supports that the Council policy embraces the Local Nature Recovery Strategy, (LNRS) as an important evidence base. Representation 4578 supports the implementation of the Kent and Medway LNRS to strengthen biodiversity and the natural environment and supports the linking of Biodiversity Net Gain (BNG) to the LNRS. Representations 4593, E.83, E.117, E.153 supported policy S2 and had comments related to BNG. Representations 4593 and E.153, suggests a 20% BNG target where appropriate. E.83 suggests small sites (<50) be exempted from BNG be reduced. E.117 suggests policy wording be revised to link the net gain requirements to legislation which can then be revised accordingly.

Representation 4765 supports the policy but suggests amending paragraph 4.3.4.E.68 suggests amending Policy S2 paragraphs 1 and 3 for clarification, suggested wording given.

E.171 supports but suggests more information on the funding mechanism.

E.204 supports but 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.

Issues:

- Does not comply with NPPF and NPPG (4578, 4591, 4890). 4578 explains 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). 4890 believes policy S2 is not sound as it is not consistent with NPPG Natural Environment 2025 paragraph 017, and the LNRS cannot be relied upon to be effective.
- Policy S2 should be amended to specifically make reference to the dark skies/tranquillity mapping project work undertaken by CPRE (4622).
- Object to 10% Biodiversity net gain as not consistent with the Kent Downs AONB management plan (4764)
- 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 (4802).
- No recent public mandate exists, the last meaningful consultation was over ten years ago (E.37)
- Disagrees with buffer distance, suggests a minimum 400m on the Hoo Peninsula and wider buffers of 1km may be needed. (E.37)
- Recommends Policy S2 be linked in with key legislation Water Environment Regulation 2017. Suggested wording given. (E.68)

- Suggests Policy wording is amended (E.68, E.148, E.177, E.184). E.68 suggests Policy S2 paragraph 14 be clarified, suggested wording given. E.148 recommend strengthening of policy wording to help clarify how development will conserve and enhance Medway's rich environmental heritage. E.177 suggests policy be amended to further clarify the Hoo Peninsula Strategic Environmental Programme (SEP) and consistency with the LNRS. E.184 also had concerns about the SEP.
- Object to 10% BNG (E.95 and E.104). E.95 states as this is not consistent with the KDNL Management plan, which is set at 20%. E.104 recommends 15% to better address the climate crisis.
- Concern about lack of conservation, loss of agricultural land, wildlife habitat and biodiversity (E.112, E.130, E.144, E.175, E.189, H.5, H.22, H.27, H.29, H.30, H.33)
- Policy is unsound, not effective and concerned policy is poorly evidenced. (E.122, E.128, E.157). E.128 also states Insufficient integration of SEA and HRA. E.157 has concerns over interim HRA's conclusion.

Response:

The Council has published further work on the Habitats Regulation Assessment and a Topic Paper on the Hoo Peninsula Strategic Environmental Programme. It supports some modifications to strengthen policy wording.

S3: North Kent Estuary and Marshes designated sites

13 representations have been received from the following consultees:

ID	Name	Stakeholder
4451	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents
4572, 4579	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
E.68	Environment Agency	Statutory Bodies
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.82	St John's College	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.148	Natural England	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.178	Halling Parish Council	MPs, Members and Parish Councils

Support

Representations 4451, 4572, 4579, E.117, E.148 and E.178 support this policy. All support the principle of the policy but have differing concerns. 4451 wishes to clarify that contributions or mitigations will be sought on new schemes and not seek to potentially duplicate contributions. 4572 suggests an amendment to paragraph 4.4.8, insert "some" in '. Both 4579 and E.148 suggest amending the policy wording, 4579 to include the findings of the SPA Review, E.148 suggests including the enhanced SAMMS approach within HRA in Policy wording. E.117 also supports the principle as making payment has been in practice for several years without issue. E.178 welcomes the protection in the plan, and the Halling Marshes are also worthy of specific mention and protection.

Issues:

- Additional context should be added regarding coastal flood risk management. (E.68)
- Local environment policies need strengthening as it will be under more threat. (E.77)
- The policy is ambiguous and extremely subjective and is therefore ineffective, If the criterion is not deliverable, it cannot be effective. Further clarity needed on policy wording and supporting text (E.82)
- Suggests a larger buffer of 8km (E.104).
- 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. (E.148)
- 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 (E.157).

Response:

The Council has published further work on the Habitats Regulation Assessment and a Topic Paper on the Hoo Peninsula Strategic Environmental Programme. It supports some modifications to strengthen policy wording.

S4: Landscape Protection and enhancement

22 representations have been received from the following consultees:

ID	Name	Stakeholder
4509	Mr Jason Tillman	Member of public
4640	Mr Kevin Smith	Member of public
4766	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4883	Nightingale Homes Ltd	Developers or Agents
E.76	Abbey Developments	Developers or Agents
E.77	The City of Rochester Society	Voluntary and Community Organisations

E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.105	Cyril Champness	Member of public
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.133	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.135	James O'Brien	Member of public
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.201	Rt Hon Kelly Tolhurst	Member of public
E.204	Kent County Council	Statutory Bodies
E.205	Antoinette Wilcox	Member of public
H.30	Steven Muspratt	Member of public
H.63	Rochester Eco-Hub	Voluntary and Community Organisations

Support

Representations 4766, E.104, E.148, E.190 and E.204 support this policy. 4766 supports this policy with no additional comment. E.104 supports policy overall but has concerns that it ignores future sea level rise for coastal and estuary developments, reliance on the EA Shoreline Management Plan is insufficient; Roles, responsibilities and coordination between Medway Council, the Environment Agency, Internal Drainage Boards and water companies are not defined. Also notes rural landscape protection outside Kent Downs is missing from the policy. E.148 support part of the policy and recommends changes to strengthen policy in relation to undeveloped coast. E.190 consider a site can be sensitively designed to balance housing delivery with landscape enhancements. E.204 supports the policy but urge the Council to extend the Historic Landscape Characterisation across the rest of Medway and draw on the research to inform the Landscape Character Assessment.

Issues:

- The local plan needs greater emphasis on green corridors linking green spaces (4509).
- Developing on the Green Belt will negatively impact on the countryside adjoining Strood and residents in the west of Strood and suggests the plan should commit to the maintenance of Green Belt that is in agricultural use and which contributes to the beauty of the countryside (4640).
- Policy needs redrafting to clearly delineate between the hierarchy of landscapes and protections that apply to each level and reflect the NPPF approach to valued landscapes (4883).

- Policy S4 does not meet the tests of soundness, the policy has insufficient clarity on its application, has not been positively prepared, and the site is in the Green and Blue Infrastructure Framework without evidence it has been appraised and is likely to undermine development proposals in the future (E.76).
- Policy needs strengthening (E.77).
- Countryside, green spaces and agricultural land need preserving for food security and wellbeing (E.105, E.135, E.205, H.30, H.63).
- Does not comply with the Hoo St Werburgh and Chattenden Neighbourhood Plan-HOO8 (Landscape and Environment (E.119).
- Concern over the strategic gap: Introduction of the 'strategic gap' without evidence is considered unjustified and not positively prepared. (E.76, E.143 E.166) Urges closing the strategic green gap between Strood, Higham, Chalk, and Gravesend. (E.135). Also Policy S4 does not reference a strategic gap but supporting paragraphs and Figure 1 does, potentially restricting development unnecessarily (E.166, E.167, E.168).
- 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 (E.133).
- Concerned about impact on SSSI and Ramsar sites (E.201).

Response:

The Council supports some modifications to strengthen policy wording.

S5: Securing Strong Green and Blue Infrastructure

28 representations have been received from the following consultees:

ID	Name	Stakeholder
4539	Blueberry Homes	Developers or Agents
4573 - 4574	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4595	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4767- 4768 / E.95	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4803	Mrs Gillian Mulloy	Members of the Public
E.2	Helen Leydon	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.76	Abbey Developments	Developers or Agents
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.94	Henry Langley	Members of the Public
E.101	Judith Masey	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.109	Helen Hammond	Members of the Public
E.117 / 800	Nightingale Homes	Developers or Agents
E.124	National Grid	Statutory Bodies

ID	Name	Stakeholder
E.133	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.139	Robin Watkins	Members of the Public
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.153	Maidstone Borough Council	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

Representations 4573, 4574, 4595, 4767, 4768 / E.95, E.94, E.104, E.117 / 800, E.124, E.148, E.153, E.190 and E.204 support this policy. Support for incorporating LNRS guidance following Kent and Medway Local Nature Recovery Strategy publication. (4573). 4574 supports connecting ecologically important sites and giving corridors formal status for creation, restoration, and maintenance. A number of recommendations are given. 4595 Suggests more specific wording on required buffers for ancient woodland, aligned with Natural England Standing Advice. 4768, 4767 and E.104 requests to include National Landscape layer in Figure 2 and ensure all Green Flag parks (e.g., Broomhill) are marked and protected on policy maps. 4768, and E.117 express overall support for Policy S5 and its objectives. 4951, 4952, E.148, E.153, and E.190 give strong support for creating a joined-up network of public open spaces and securing green and blue infrastructure as part of development. Calls for clarity on Green Infrastructure Standards and ensuring GI plans are integral to applications, not just supporting documents. E.94 and E.204 call for conservation of green spaces and historic orchards, and GI design that follows historic roads/routes to integrate new development with landscapes, link heritage and ecology, and boost tourism. E.124 notes that strategic development and GI can be delivered in tandem with good design, but Tier 3 references should not unduly restrict sites.

Issues:

- Recommend that Policy S5 is strengthened (E.77, E.68) and provides further clarity on policy wording (E.157) the requirements, definitions, cross referencing (E.166, E.167, E.168) in order to be consistent with national policy, found sound and comply with NPPF paragraph 20d (E.166) and how the Green Infrastructure Plan and its content is required to meet policy objectives (4539).
- 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 (E.157).
- Insufficient evidence to conclude area is suitable for development (E.139).

- Concern about level of development and subsequent loss of green spaces (E.109).
- Suggests more focus on blue infrastructure (E.68).
- 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. (4574)
- Supporting text: Request the following amendment for accuracy:
 - Amend Figure 2 to include a National Landscape layer within “Tier 1: designated sites SPA SAC Ramsar, **National Landscape, and SSSI**”. (4768)
- Health, biodiversity benefits and economic gains from accessible greenspaces are unrealistic due to poor infrastructure and lack of safe, sustainable access. Suggests changes to plan including safe and environmentally sensitive active travel infrastructure, community engagement and environmental stewardship and traffic management near greenspaces (4803)

Response:

The Council supports some modifications to strengthen policy wording.

S6: Kent Downs National Landscape

10 representations have been received from the following consultees:

ID	Name	Stakeholder
4763, 4769 – 4772	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4804	Mrs Gillian Mulloy	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117 /800	Nightingale Homes	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.148	Natural England	Statutory Bodies

Support

Representations 4763, and 4769-4772, E.104 and E.148 support this policy. Representation 4763 suggests moving Policy S6 to earlier in the chapter to be immediately after Policy S3 to improve clarity. Representations, 4769, 4770, 4771, 4772 support the policy and suggests minor alteration to the supporting text paragraph 4.7.2, criteria e, paragraphs 4.7.5, 4.7.7 respectively. E.104 accepts the revised version. E.148 broadly support the policy wording and recommends there is a stronger focus on how developments will be assessed in terms of their landscape character and visual impacts to the Kent Downs.

Issues:

- Vague language in landscape protection policies and lack of measurable enforcement; suggests independently verified landscape impact assessments, following strict mitigation hierarchy and committing to on-going post-development monitoring with clear mechanisms for enforcement, remediation, and penalties for non-compliance are needed (4804).
- The policy should be in conformity with the terms of the NPPF, presently set out at paragraph 189, (E.117/800) and paragraphs 187-195 (E.119)

Response:

The Council supports some modifications to strengthen policy wording.

DM1: Flood and Water Management

14 representations have been received from the following consultees:

ID	Name	Stakeholder
4418 -4419, 4424	Mr Ray Dines	Members of the Public
4659	David Hopkins	Members of the Public
4920	Mr Darren Smith	Members of the Public
E.63	Carol Pires	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.82	St John's College	Developers or Agents
E.86	MMO Marine Planning	Statutory Bodies
E.87	Lesley Harrison	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.122	Catesby Strategic Land Limited	Developers or Agents
E.148	Natural England	Statutory Bodies
E.153	Maidstone Borough Council	Statutory Bodies
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

Representations 4659, E.68, E.86, E.153, and E.204 support this policy and supporting text. 4659 supports the policy ambition. E.68 supports use of Drainage and Wastewater Management Plans but suggest wording to clarify that the DWMP include short term and medium term goals as well. Suggested wording given. E.86 states under the Marine and Coastal Access Act 2009, any activity carried out below mean high water springs in the UK marine area—ranging from mooring private jetties to major projects like nuclear power plants and offshore wind farms—requires a marine licence, which is consented and regulated by the marine licensing team. E.153 supports and would like to see reference to prioritising 'wet SuDs' to maximise positive ecological and landscape impact from use of this technology. E.204 supports and suggests a

typographical error under sub-section Sustainable Urban Drainage Systems (SuDS) be amended. Suggested wording given.

Issues:

- Concern over development worsening sewage discharge and suggests separate sewage and water systems to prevent pollution. (4920)
- 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). (E.63)
- Concern over potential capacity issues in the near future (E.68)
- Concern over s106 and other mechanisms to support flood risk works, not clear which mechanism will be put in place and how it will be enforced. Suggests policy needs to be more specific about this. (E.68)
- Plan is unsound for numerous reasons including:
 - the SFRA does not include or use the latest flood risk information,
 - evidence base documents not clearly demonstrating how high and medium flood risk site allocations have been selected and justified,
 - generic and weak policy wording,
 - clarification on flood defence infrastructure and funding needed. (E.68)
 - 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 (E.68).
- Concern that the inspector may seek reference to the South East Marine Plan, and to the requirement for decision makers, such as Medway Council, to take the marine policy statement and marine plans into account under the Marine and Coastal Access Act 2009. Suggests the Council completes its own interpretation of the South East Marine Plan and Explore Marine Plans. (E.86)
- Concern over water supply infrastructure, current hosepipe bans and sewage issues (E.87).
- Major concerns regarding flood defence proposals. (E.104)
- Hoo Peninsula has existing water, sewerage and education provision capacity deficits so concerned about further development without this infrastructure in place (E.119).
- Not legally compliant – sequential test unnecessary reflected against NPPF and foul drainage is a requirement for water companies and is not a planning requirement. (E.190).
- Suggests amending supporting text:
 - for the plan to identify the scale and timescale of infrastructure required and how it will be funded over the plan period. (4418)
 - To clarify paragraph 4.8.10 and state how the supplies and resources will be protected and conserved. (4419)
 - To add more detail on what infrastructure is required to tackle water pollution and when it will be provided. (4424)
 - Add wording to paragraphs 4.8.3, 4.8.7 and 4.8.8. Suggested wording given. (E.104)
 - Add bullet point to paragraph 4.8.4 to reflect role of the SFRA, wording given. (E.68)

- Suggest amendments to wording of Policy DM1:
 - Suggests amending the Sustainable Urban Drainage part of the policy, suggested wording given. (4884, 4954, E.68)
 - The current text is not specific, measurable, achievable, relevant or timebound (E.68)
 - Adaption to Climate Change section of policy: This section doesn't reference the need for flood defence improvements and/or adaption to climate change. Suggested wording given. (E.68)
 - Under Water supply section of policy: should be amended for clarification purposes. Suggested wording given. (E.68)
 - Amend Water quality and groundwater protection section. Suggested wording given (E.68)
 - Objects to wording under 'Wastewater/foul Drainage' section of Policy DM1, amendments suggested. (E.68, E.82).
 - Wording may conflict with developers' statutory rights under the Water Industry Act 1991, suggests amending. (E.122).
 - Additional wording suggested by NE to strengthen policy. (E.148).

Response:

The Council has carried out further work in relation to the SFRA and has engaged with the Environment Agency through an updated Statement of Common Ground. This may include modifications to the plan to strengthen the policy.

DM2: Contaminated Land

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents

Support

Representations E.104 and E.117 support this policy. E.104 notes the additional criteria set out in Policy DM2. However, would also like an additional clause, suggested wording given. E.117 are supportive of the Policy's approach.

Issues:

- Policy required clarification and objected to the term 'Contaminated Land', rewording was suggested:
 - Policy DM2 and paragraph 4.9.3 wording should be amended for clarification purposes. Suggested wording given. (E.68)

- Supporting text of 4.9 and title of section as 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'. (E.68).

Response:

Noted. No changes required.

DM3: Air Quality

13 representations have been received from the following consultees:

ID	Name	Stakeholder
4641 - 4642	Mr Kevin Smith	Member of public
E.23	Nicola Smith	Member of public
E.55	Maggie Antoniou	Member of public
E.94	Henry Langley	Member of public
E.101	Judith Masey	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.171	Redrow Homes Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.192	Frindsbury Extra Parish Council	MPs, Members and Parish Councils
H.59	High Halstow & St Mary Hoo Parish Council	MPs, Members and Parish Councils

Support

Representations E.94, E.104, E.117 and E.171 support this policy. E.94 Supports policy DM3 and urges stronger transport objectives, emphasizing reduced congestion and enhanced air quality. E.104 suggests increasing 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 and amending the Local Plan as such. E.117 and E.171 are supportive of the Policy approach.

Issues:

- Concern that development on Green Belt will lower air quality, suggests amending supporting text (4641).
- Increase in air pollution should not be considered acceptable and suggests amending supporting text (4642).
- Queries why commission landowners and developers to prepare a high-level plan to inform the framework of policy? Better community engagement needed. (E.23)
- Concern over level of air pollution / quality (E.55, E.101)

- HRA has not assessed impacts of air quality which is not legally compliant. (E.119)
- 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. (E.184)
- Concern over air quality at Four Elms Hill (E.192, H.59) Object to supporting text paragraphs 4.10.1 and 4.10.2. Concern over development in areas with existing poor air quality and that air quality around Four Elms roundabout is based on out-of-date AQAP. There is also no evidence of site-specific air quality assessments for Strood West (SA6) and Medway City Estate (SA13). Need environmental mitigation for health reasons (E.192).

Response:

The Council would welcome changes to strengthen policy wording. Additional work on the Habitats Regulation Assessment was undertaken to consider the air quality impacts.

DM4: Noise and Light Pollution

7 representations have been received from the following consultees:

ID	Name	Stakeholder
4621, 4623	CPRE Kent	Voluntary and Community Organisations
4773	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
E.19	Claire Glover	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.148	Natural England	Statutory Bodies

Support

Representations 4773, E.104 and E.117 support this policy. Welcome recognition of the contribution of tranquillity to conserving the qualities of the Kent Downs National Landscape. However, suggest reference to requiring LVIA's be included in Policy S4: Landscape Protection and Enhancement (4773). E.104 Support, but 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". E.117 is supportive of the approach.

Issues:

- DM4 should be amended to specifically make reference to the dark skies/tranquillity mapping project work undertaken by CPRE. Suggests changes to align with those adopted in the Swale and Ashford local plans (4621, 4623).
- Air pollution, noise pollution and light pollution will be heavily affected (E.19).
- Suggested some amendments to help ensure that the requirements for developments only being consented where adverse impacts from noise and light pollution to ecological receptors and the Kent Downs National Landscape are avoided or fully mitigated are clear and more closely align with the requirements within the NPPF. Suggested wording given (E.148).

Response:

The Council would welcome changes to strengthen policy wording.

S7: Green Belt

54 representations have been received from the following consultees:

ID	Name	Stakeholder
4384	Mr Stephen Hubbard	MPs, Members and Parish Councils
4567	Mrs Helen Lucas	Members of the Public
4643 - 4644, 4649 – 4652,	Mr Kevin Smith	Members of the Public
4763 / E.95	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4805 - 4806	Mrs Gillian Mulloy	Members of the Public
4885 / E.117	Nightingale Homes Ltd	Developers or Agents
4930	Barratt David Wilson Homes	Developers or Agents
5010	Mrs Pamela Donoghue-Freeburn	Members of the Public
5018	Mr Richard Bellingham	Members of the Public
E.2	Helen Leydon	Members of the Public
E.8	Jennifer Price	Members of the Public
E.23	Nicola Smith	Members of the Public
E.32	Michael McEvoy	Members of the Public
E.46	Paul Davies	Members of the Public
E.50	Alf & Sharon Wightwick	Members of the Public
E.53	Kelvin Carr	Members of the Public
E.55	Maggie Antoniou	Members of the Public
E.66	Cliff Webb	Members of the Public
E.84	Diocese of Rochester	Developers or Agents
E.88	Louise Hubbard	Members of the Public
E.89	Christine Marsh	Members of the Public
E.90	Keith Best & Lesley Best	Members of the Public
E.98	John Leigh and Shirley Leigh	Members of the Public
E.99	Marilyn Hawkes	Members of the Public

ID	Name	Stakeholder
E.101	Judith Masey	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.107	Kevin Price	Members of the Public
E.118	Gleeson Land	Developers or Agents
E.128	Louise Putnam	Members of the Public
E.131	Mark Batchelor	Members of the Public
E.140	Bruce Cagneux	Members of the Public
E.142	Richard Gransden	Members of the Public
E.148	Natural England	Statutory Bodies
E.149	St Andrew Leisure Development Ltd	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.159	Natalie Hale	Members of the Public
E.163	Justine Percy	Members of the Public
E.170	Richborough	Developers or Agents
E.180	Nick Dowling	Members of the Public
E.188	John Connelly	Members of the Public
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.194	Sean Varnham	Members of the Public
H.3	N.B. Chapman	Members of the Public
H.19	Michael O'Hanlon	Members of the Public
H.20	S O'Hanlon	Members of the Public
H.25	Carol Driver	Members of the Public
H.27	M Wellard	Members of the Public
H.28	Neil Harris & Marie-Jose Harris	Members of the Public

Support

Representations 4763/ E.95, and 4930 support this policy. 4763 / E.95 supports Policy S7 but suggests it should be moved to earlier in the chapter to avoid overlap of policies in this section. 4930 Supports Green Belt boundary revision and release of land identified in Policy SA6.

Issues:

- Not justified or consistent with NPPF, other sites outside of Green Belt have not been sufficiently considered (E.190, E.194) Update policy to reflect the NPPF - paragraph 153, very special circumstances (4885 / E.117)
- 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 (4384). Concern independent review of Green Belt Review has not been published for public scrutiny. (4644)
- Querying release of greenbelt land and intention, not justified contrary to NPPF, with lack of information / evidence shared with the general public. (4567, 4650, 4805, E.23, E.32, E.46, E.50, E.53, E.98, E.131, E.140, E.142)

- Concern that Medway have been pressured by Gravesham Council and misuse of duty to cooperate to release Green Belt to the west of Strood. Suggests removal of Green Belt status for Land West of Strood should be deleted. (4643)
- Concerns over Medway Green Belt Review 2025 as being “over simplistic” (E.8) is flawed and should be disregarded. The Exceptional Circumstances claimed are not valid. (4649, 4651)
- Policy S7 would be better sitting earlier in the chapter to reduce overlap between policies. (4763)
- Paragraph 4.12.9 does not give sufficient emphasis to Medway Council's obligations to strongly represent the views of residents and should be amended (4652).
- Warns of piecemeal development eroding Greenbelt and biodiversity contrary to national planning principles (4806, 5018, E.163).
- Criticises vague definitions and loopholes that allow inappropriate development and suggests this be amended in the plan (4806).
- Failure of plan to adopt brownfield first approach (5010, 5018, E.23, E.46 E.50, E.90, E.128).
- Concern over long term irreversible environmental damage (5018, E.188).
- Objects to Green Belt reclassification to grey belt. (E.2, E.8, E.23, E.50, E.66, E.88, E.89, E.99, E.101, E.104, E.107, E.159, H.3,) The reclassification contradict NPPF definitions and no exceptional circumstances to justify it (E.89, E.159, E.170)
- Concern over planning before Gravesham finalised its own plan, despite cross border implications. (E.8, E.32, E.55, E.194) 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. (E.180)
- Green Belt development threatens agriculture, wildlife, and environmental health (H.25) and Green Belt loss near Strood threatens biodiversity and wellbeing. (H.19, H.20, H.27 and H.28)
- 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. (E.84)
- Only parcels 2–4 are affected, raising questions about fairness and transparency in the Local Plan. (E.88, E.140)
- Removing Green Belt allocations on the basis exceptional circumstances is not justified. (E.118)
- To comply with Paragraph 156(c) & 159 of the NPPF NE suggest additional text to policy. Suggested text given (E.148)
- Requests St Andrews Lake site is removed from greenbelt to enable wider uses/further expansion. (E.149)
- 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. (E.157)

Response:

Green Belt Review has been published and a Topic Paper on exceptional circumstances prepared for Submission.

Plan has brownfield first approach.

5. Built Environment

T1: High Quality Design and Amenity

9 representations have been received from the following consultees:

ID	Name	Stakeholder
4540 - 4541	Blueberry Homes	Developers or Agents
4598	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4774	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Body
4906	Kitesfield Estates Limited	Developers or Agents
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents

Support

Comments received generally support this policy. There is a strong emphasis on incorporating higher sustainability standards beyond government requirements, such as specifying solar panels, battery storage, and water recycling systems. Accessibility and adaptability are highlighted, with suggestions to include Part M requirements for dwellings.

Issues:

- Remove reference to building heights/views (4540,4541).
- Maintain position and object. 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' (4540, 4541).
- 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 (E.68).
- Multiple responses request clarity and updates to design standards, particularly aligning with the GLA's minimum internal space standards and ensuring adequate outdoor space for flats.
- while concerns are raised about the vague reference to "dementia friendly standards," which is considered unnecessary as it is already covered under Policy T4 and Building Regulations

Response:

Noted. No changes required.

DM5: Housing Design

11 representations have been received from the following consultees:

ID	Name	Stakeholder
4503	Mrs Elizabeth Poynter	Member of the public
E.7	Designing out Crime Team (Ally Hendry)	Other
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developer or Agent
E.122	Catesby Strategic Land Limited	Developer or Agent
E.123	Veetee Rice Ltd	Developer or Agent
E.143	Taylor Wimpey & Persimmon Homes	Developer or Agent
E.150	Mr Kevin Rice	
E.158	Option Two Development Limited	Developer or Agent
E.165	Bellway Strategic Land (Brompton Farm)	Developer or Agent
E.190	Catesby Strategic Land (Lower Rainham Road)	Developer or Agent

Support

Comments support this policy. Respondents suggest introducing specific renewable energy standards beyond government requirements, including minimum expectations for solar panels, battery storage, and water recycling systems. Calls to update the Medway Housing Design Standard to align with GLA minimum spatial requirements.

Issues:

- Objection to build on current greenbelt land adjacent to the top of Carisbrooke Road, referred to as 'plot' SNF1. (E.7).
- Need evidence to support additional requirements (E.117).
- Supports inclusive housing design. Ambiguity makes it ineffective for decision-making (E.122).
- Policy is vague regarding refuse recycling and storage (E.122, E.143).
- Recommends policy amends. The requirement for “dementia friendly standards” is not specific and is already included in Policy T4 and raises 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 (E.165).

Response:

Noted. No changes required. Policy T1 provides criteria for all types of development (Commercial and housing) and this policy builds on that by including aspects required to guide quality of housing not included in policy T1.

DM6: Sustainable Design and Construction

11 representations have been received from the following consultees:

ID	Name	Stakeholder
4542	Blueberry Homes [694]	Developer or Agent
4886	Nightingale Homes Ltd [800]	Developer or Agent
E.9	Keith Bell	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.123	Veetee Rice Ltd	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.158	Option Two Development Limited	Developers or Agents
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

There has been general support for the policy but make some suggestions, which are mentioned below under issues.

Issues:

- Propose a minimum standard of new housing should be set at Eco Homes, and preferably Passiv Haus where economically viable. (E.104)
- Suggests that the policy would benefit from clarifying that new proposals be required to meet the new Defra SuDs Standards (E.204)
- Requests that bullet point six be removed (E.123)
- 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 (4542).
- Support but needs to be compliant with building regulations (4886)
- 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 (E.68).
- Reference to targeting net zero carbon should be removed. This is a matter that is already addressed in Building Regulations (E.143).

- 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 (E.150).
- 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, so 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 (E.158).
- This is also now superseded by Building Regulations (E.165).

Response:

Some of these comments could be addressed through proposed modifications, if considered acceptable by the Inspector.

DM7: Shopfront Design and Security

3 representations have been received from the following consultees:

ID	Name	Stakeholder
4504 - 4505	Elizabeth Poynter	Member of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

Comments were supportive of the latest version of this policy and raised the importance of frontage design to improve the appearance particularly where shutters are present.

Issues:

No issues logged.

Response:

No issue logged requiring a response.

DM8: Advertisements

1 representation have been received from the following consultee:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

In general support of the policy.

Issues:

- Suggests for bullets 1 & 2, parameters are set within the over-arching Medway Design Guide which prevents size creep.

Response:

Noted. No change required.

S8: Historic Environment

4 representations have been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117 / 800	Nightingale Homes Ltd	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

- All respondents have overall support for Policy S8 (with targeted refinements), broad support is expressed for the aims and structure of Policy S8. Support is conditional in places, seeking minor wording tweaks and clearer cross policy alignment.

Issues:

Whilst all comments were supportive, there are various comments raising issues:

- Queries scope of assets to be explicitly covered. (E.104)
- Supports the aims but recommend a review of the wording in draft policies S8, DM9 and DM10 to ensure consistency, clarity and alignment across the suite. (E.190)
- Suggests amending wording (e.g., bullet point 2) to: *“Ensuring development sustains or enhances designated and non-designated heritage assets and their settings in a manner appropriate to their significance.”* Using “sustain or enhance” instead of “preserve” provides appropriate flexibility while keeping significance at the core. (E.204)
- Welcomes clear linkage between Policy S8 and the Medway Heritage Strategy, reinforcing policy coherence and delivery context. (E.204)

Response:

Noted. No changes required.

DM9: Heritage Assets

11 representations have been received from the following consultees:

ID	Name	Stakeholder
4887	Nightingale Homes Ltd	Developers or Agents
E.79	Historic England	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.122	Catesby Strategic Land Limited	Developers or Agents
E.123	Veetee Rice Ltd	Developers or Agents
E.150	Kevin Rice	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street)(Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street)(Phase 1&2)	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

Comments have been supportive of this policy with some suggested amends captured below.

Issues:

- Currently worded policy is not consistent with NPPF para 215. A distinction between designated and non-designated required (4887, E.79)).
- States a greater emphasis needed on heritage at risk and Local List assets; request a separate policy linked to national KPIs. (E.79)
- Suggests amending policy wording: in paragraph 2 (penultimate sentence after “and wider setting”), add recognition of historical village greens (e.g., Grain, Frindsbury, Gillingham Greens, Hook Meadow) as heritage assets within the historic landscape, with protection. Introducing specific parameters so any “out-weighting” can be demonstrated and quantified is also suggested. Revise paragraph 5 to acknowledge permission to demolish (and leave as open space) where a building is in exceptional disrepair with risk of collapse and adding text reminding owners of their duty to maintain buildings, particularly historic assets is also suggested. As is, including a subsection on works to listed buildings and assets. (E.104)
- Full applications for development within or affecting Conservation Areas is burdensome and not justified (E.123, E.150, E.166, E.167, E.168). Suggest amending policy text to this delete requirement (E.123).
- Encourage full applications but allow outlines (E.122)
- Policy DM 9 is covered by Policy DM10 (E.190).
- Welcomes commitment to a Local Heritage List; ensure it includes archaeological sites, historic landscape features, as well as buildings. It also notes section 5.8.10:

Conservation Area Appraisals (CAAs) are vital for identifying NDHAs; encourages CAAs for all Conservation Areas. Also suggested is restructuring policy to state asset types up-front (historic buildings, parks & gardens, historic landscapes) and specify information requirements for applications under each type. Additionally, replacing “preserve” with “sustain” to allow more flexibility. Also, amend the paragraph on loss/substantial harm to designated assets to better align with NPPF para 214. (E.204)

Response:

Medway has worked with statutory bodies to discuss potential approaches in addressing these matters and are open to any suggested amends the Inspector would recommend/require.

S9: Star Hill to Sun Pier

4 representations have been received from the following consultees:

ID	Name	Stakeholder
740	Mr Bryan Fowler	Member of the public
104	Medway Liberal Democrats	MPs, Members and Parish Councils
158	Option Two Development Limited	Developers or Agents
204	Kent County Council	Statutory Bodies

Support

All representations support this policy noting the importance of recognizing local heritage, including the newly established Intra Marine Trust and the role of the river and its piers in preserving the area’s historic character. Respondents also endorse the Development Framework and its use as a guiding document for future development, while suggesting clearer communication by explaining acronyms such as HAZ (Heritage Action Zone) to improve understanding. Overall, the comments reflect strong support for heritage integration and clarity in policy presentation.

Issues:

No issues logged.

Response:

No issues logged requiring a response.

DM10: Conservation Areas

8 representations have been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

E.117/800	Nightingale Homes	Developer or Agent
E.158	Option Two Development Limited	Developer or Agent
E.166	Bellway Strategic Land (Mierscourt Road)	Developer or Agent
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developer or Agent
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developer or Agent
E.190	Catesby Strategic Land (Lower Rainham Road)	Developer or Agent
E.204	Kent County Council	Statutory Bodies

Support

Comments of support of the policy and on tightening of parameters and encourages the Council to ensure that all Conservation Areas have accompanying CAAs.

Issues:

- Fails to allow for the NPPF's balancing exercise at paragraph 215 and the final bullet point to "remove features that detract from the character of the area unless demonstrated to be unachievable" should be removed as this is not justified or consistent with National Policy and unreasonable and potentially unviable (E.166, E.167 and E.168).
- Suggested amendments to policy wording as it is too restrictive (E.158, E.104).
- DM10 to avoid repetition/overlap and improve clarity/consistency across the suite.

Response:

Noted.

DM11: Scheduled Monuments and Archaeological Sites

2 representations have been received from the following consultee:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

Representations support this policy. Comments note the tightening of parameters/clauses (more mandatory than desired) and views this as an improvement. The recognition that non-scheduled archaeological sites can be of equivalent significance is welcomed.

Issues:

No issues logged

Response:

No issues logged requiring a response.

6. Housing

T2: Housing Mix

25 representations have been received from the following consultees:

ID	Name	Stakeholder
4350	Mr Anthony Barry Arnold	Members of the Public
4454	Miss Ellie Smith	Members of the Public
4508	Mrs Elizabeth Poynter	Members of the Public
4543	Blueberry Homes	Developers or Agents
4661	Mr David Hopkins	Members of the Public
4674	Mrs Ruth Dyke	Members of the Public
4726	Miss Jackie Forrest	Members of the public
4899	Mrs Gillian Mulloy	Members of the Public
4451	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents
E.42	Port Medway Marina	Developers or Agents
E.49	Kent SME Network	Developers or Agents
E.51	Endeavour Gillingham Limited	Other
E.68	Environment Agency	Statutory Bodies
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.123	Veetee Rice Ltd	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.158	Option Two Development Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.162	Kitewood Estates Limited	Developers or Agents
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.170	Richborough	Developers or Agents

Support

A number of supportive comments were made in relation to this policy. Many made reference to the importance of recognising the house need of specific groups such as older persons, those needing bungalow accommodation as well as references to support for housing affordability. Some supported with additional request for flexibility in policy in relation to every site needing to delivery full mix. One comment queried the inclusion of references to types of housing needed if included in a separate housing policy.

Issues:

- Remove reference to self-build plots as covered in Policy T9 (E.123, E.150, E.158, E.165).
- Request for flexibility of mix - not all sites can provide full mix (4543, E.42, E.51).
- Mix should be supported by latest evidence and locally informed need/ Lack of evidence to support (E.122, E.170).
- Housing being built without associated infrastructure (4454).
- Need for higher level of affordable housing within mix (4508).
- Concerns over soundness of LHNA and housing delivery – enforcing infrastructure delivery, setting phasing within policy linked to infrastructure, use of CIL (4899).
- Objecting to reference to ‘developments must be appropriate to the established character and density of the neighbourhood’ (E.51).
- Lack of reference to SUDs or wastewater management requirements (E.68).
- Policy should support all types of affordable housing types to foster complete communities, reuse empty properties and later years dwellings (E.77).
- Do not accept that housing mix must include bungalows in high density developments (E.161).
- Objects to reference to ‘bungalows’ and ‘downsizing’ (E.162).

Response:

Policy T2 received a fair number of responses some supporting others objecting. The objections related to a wider range of issues the notable in quantity being requests for flexibility within the policy as not all sites can deliver a full mix and others requesting removal of reference to custom & self-build from this policy. Some aspects are covered by other policies.

T3: Affordable Housing

39 representations have been received from the following consultees:

ID	Name	Stakeholder
4351	Mr Anthony Barry Arnold	Members of the Public
4402	Mrs Clare Marshall	Members of the Public
4451	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents
4527	Ms Georgina Kosanovic	Members of the Public
4511	Mrs Elizabeth Poynter	Members of the Public
4544	Blueberry Homes	Developers or Agents
4620	CPRE Kent	Voluntary and Community Organisations
4662	Mr David Hopkins	Members of the Public
4775 / E.95	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4825, 4827	Mrs Gillian Mulloy	Members of the Public
4888 / E.117	Nightingale Homes Ltd	Developers or Agents
4905	Kitesfield Estates Limited	Developers or Agents
5025	Mr Lincoln Ritchie	Members of the Public
E.14	Lyn Wiles	Members of the Public
E.42	Port Medway Marina	Developers or Agents

ID	Name	Stakeholder
E.48	Graham Page	Members of the Public
E.49	Kent SME Network	Developers or Agents
E.51	Endeavour Gillingham Limited	Other
E.63	Carol Pires	Members of the Public
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.80	Home Builders Federation (HBF)	Developers or Agents
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.114	Churchill Living and McCarthy Stone	Developers or Agents
E.118	Gleeson Land	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.123	Veetee Rice Ltd	Developers or Agents
E.134	Esquire Developments (Rainham Parkside Village)	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.152	Gladman	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.162	Kitewood Estates Limited	Developers or Agents
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.170	Richborough	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents

Support

- Representations request prioritising affordable housing for local residents and make it possible for more people—especially younger generations and those on average wages—to buy their own homes. General issues of affordability pressures, housing quality, and infrastructure/parking realities are noted. There is supports for the threshold of 10+ dwellings triggering affordable housing. Comments also endorse First Homes.

Issues:

- Concern over the Local Housing Need Assessment not facilitating quick delivery of site-specific affordable housing, suggests amending Policy T3 (4451).
- Concern raised over viability issues, affordability and issues around re-sale. Suggests social housing percentages increased on each new housing development (4511)

- Objects to policy as no map provided of high and low value areas. (4544, E.134)
Clarification on which areas are “high value” “Low value” for affordable housing (E.118).
- Policy T3 should set a lower affordable housing requirements of 6 units or more on windfall sites in the National Landscape (4775)
- Not consistent with NPPF as Viability assessment at para 2.50 is incorrect (4775)
- Affordable housing requirements in Policy T3 is unclear (4775)
- Highlights the mismatch between projected housing delivery and market realities. Suggests market absorption analysis as part of major site allocation justification, contingency measures to adjust phasing and tenure mix where new-build sales rates slow, and inclusion of more affordable, mid-market, and local-needs housing to ensure consistent uptake. (4825)
- 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. Numerous changes to plan suggested (4827)
- Concerns expressed over the approach for PDL sites and suggests amendments to Policy T3 (4888, 4905)
- Requests clarity on whether C2 extra care housing is exempt from AH requirements. (4888)
- Queries availability of affordable housing, particularly for Medway residents (E.14, E.63)
- Suggests amendment / modification of policy (E.42, E.51, E.80, E.95, E.114, E.123, E.134, E.143, E.150, E.165, E.166, E.167, E.170, E.171, E.168)
- Policy should foster complete communities via affordable diverse housing types for local people, reuse of empty homes, and specialist later-life dwellings. (E.77)
- Further work to consider level of affordable housing needed across identified sites. (E.122, E.134)
- Allocate more greenfield sites (E.152).
- The Local Plan is not sound as the land supply is not able to meet evidenced affordable housing needs. Suggests reducing reliance on brownfield sites (E.170).
- 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 (E.171).

Response:

Some comments may require a change to the policy or supporting text, if it was deemed necessary.

T4: Supported Housing, Nursing Homes and Older Persons Accommodation

15 representations have been received from the following consultees:

ID	Name	Stakeholder
4352	Mr Anthony Barry Arnold	Members of the Public
4512	Mrs Elizabeth Poynter	Members of the Public

4545	Blueberry Homes	Developers or Agents
4663	Mr David Hopkins	Members of the Public
4828	Mrs Gillian Mulloy	Members of the Public
4889	Nightingale Homes Ltd	Developers or Agents
4960	Ms Karen Scott	Members of the Public
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.94	Henry Langley	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.114	Churchill Living and McCarthy Stone	Developers or Agents
H.24	Michael White	Members of the Public
E.16	Habinteg Housing Association	Developers or Agents
E.17	Richborough	Developers or Agents
E.19	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents

Support

A number of comments were received which generally supported this policy. A number recognised the need for specialist housing to be supported by the Local Plan referencing the needs of younger disabled residents and looked after children. A reference to housing option affordability was made highlighting a shortage in suitably sized units. One comment referred to the need to distinguish between the accommodation needs of older persons generally and those persons with additional needs. Others noted the need for availability of housing options for older persons for downsizing, to make better use of housing stock to free up accommodation for families. One comment queried wording within in the policy in terms of clarification of how a planning application can ‘meet a proven need’.

Issues:

- Lack of alignment to local health data/policy loopholes (4828).
- Link dementia friendly standards to design standards (4828).
- include wording to secure local skills and care sector training (4828).
- need evidence to support ‘no need’ to avoid loss of specialist housing (4828).
- Need greater certainty of delivery in policy (4889).
- Policy should foster complete communities via affordable diverse housing types for local people, reuse of empty homes, and specialist later-life dwellings (E.77).
- Policy does not go far enough in supporting the delivery of older persons housing (E.114).
- Sustainable design and elderly-friendly housing must be prioritised – M4(3) standard for wheelchair access (H.24, E.160).
- The policy wording is not supportive of delivery and places an expectation on developers to prove the need (E.170).

Response:

This policy received a mix of objections. Some consultees requested more detail to be added to policy wording to give greater clarity. This suggests the need for a stronger policy. This could be addressed through amendments to the policy if supported by the Inspector.

T5: Student Accommodation

5 representations have been received from the following consultees:

ID	Name	Stakeholder
4513	Mrs Elizabeth Poynter	Member of public
4528	Ms Georgina Kosanovic	Member of public
4961	Ms Karen Scott	Member of public
E.68	Environment Agency	Statutory Body
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

Representations support the policy focusing on support for purpose-built student accommodation for student social interaction and to limit anti-social issues. There is also support for this policy focusing on accommodation needs for further education students to open up opportunities.

Issues:

- With the University of Kent winding down its programmes in Medway, student accommodation for those attending university in this area should decrease (4528).
- 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. This policy should refer to the 'hierarchy of non-mains alternative solutions' in policy DM1 (E.68).

Response:

Noted. No change required.

T6: Mobile Home Parks

4 representations have been received from the following consultees:

ID	Name	Stakeholder
4727	Miss Jackie Forrest	Member of public
4830	Mrs Gillian Mulloy	Member of public
E.68	Environment Agency	Statutory Body
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

Representations support this policy mentioning that better roads leading into mobile home parks are required.

Issues:

- 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 (4830).
- 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 (E.68).

Response:

Noted. No change required. The Council has worked collaboratively with the Environment Agency to resolve their comments.

T7: Houseboats

7 representations have been received from the following consultees:

ID	Name	Stakeholder
4876	Mrs Alison Heine	Developers or Agents
5015, 5017, 5020	National Bargee Travellers Association (Ms Pamela Smith, Chair)	Voluntary and Community Organisations
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies

Support

A couple of comments were made in general support of this policy with suggestions of improving text and making the policy stronger.

Issues:

- No assessment of need contrary to Section 124 of the HPA16. LHAs have a statutory duty under Section 225 of the Housing Act 2024 to conduct an accommodation needs assessment of people of a nomadic habit of life. Querying link to policy T22 as a negative approach (4876).
- Visual appearance should not be used as a factor in deciding whether or not to grant planning permission, other living standards issues for boat dwellers (5015, 5017, 5020).
- No reference to grey water disposal. Could potentially cause damage to the water environment (E.68).

Response:

Policy T7 received a handful of comments. The objections related to a requirement under the Housing Act to assess houseboat housing need which falls under the Housing Service rather than the Local Plan policy. An environmental concern was raised in connection to the handling of grey water from houseboats.

T8: Houses of Multiple Occupation

29 representations have been received from the following consultees:

ID	Name	Stakeholder
4353	Mr Anthony Barry Arnold	Members of the Public
4660-4472	Ms Wendy Taylor	Members of the Public
4588	Ms Tracy Stott	Members of the Public
4831	Mrs Gillian Mulloy	Members of the Public
4869-4874	Mrs Pauline Barritt	Members of the public
E.71	Andy Mugford	Members of the Public
E.73	Claire Burton	Member of the Public
E.75	Cherilea Smith	Member of the Public
E.78	Caroline Crouch	Members of the Public
E.91	Gordon Smith	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.153	Maidstone Borough Council	Statutory Bodies

Support

A number of comments were received in general support of this policy while at the same time acknowledging the challenges HMOs can create in established communities. A number of points linked to HMO licensing and other enforcement issues.

Issues:

- Support for an HMO Article 4 Direction (4588, E.71, E.73, E.75, E.78, E.91).
- Fails to prevent HMO clustering, protect family housing, lacks measurable criteria and risks undermining housing mix and community trust (4831).
- Concern over negative impacts of HMOs – poor management, exploitations of vulnerable tenants (4871).
- Full review of HMOs required then annual reviews (4872).
- Greater clarity in policy required – what is an over concentration of HMOs, how determined, how is excessive parking demands assessed? (E.153).

Response:

The most common issue raised in relation to HMOs was the request for the introduction of an Article 4 Direction for HMOs. This is being progressed by the Council.

A number of other respondents relating to the negative impact of HMOs on residential neighbourhoods with some responses calling for a stronger policy to manage HMOs.

A number of points were raised in terms of management of HMOs which are more linked to the licensing of HMOs.

T9: Self-Build and Custom Housebuilding

17 representations have been received from the following consultees:

ID	Name	Category
4931	Barratt David Wilson Homes	Developers or Agents
E.13	Peter Lowe	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.80	Home Builders Federation	Developers or Agents
E.82	St John's College	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents

Support

There has been general support for the policy with some recommendations captured below.

Issues:

Affordable Housing

- Rep 4931: No objection to plots on large sites where sufficient demand but objects to exclusion of self-build from affordable housing provision. Proposes policy modification: self-build only counts towards affordable housing provision if it meets NPPF Annex 2 definition.
- Rep E.82: Similar objection; argues Viability Assessment lacks justification for excluding self-build from affordable housing.

Unsold Plots Offered to Council/Housing Association

- Reps 4931, E.80, E.82, E.177, E.184: Recommend removing requirement to offer unsold plots to Council/HA after 12 months; cite Spelthorne precedent and lack of viability testing. 4931 provides examples of authorities without this requirement. E.80/E.82 see no justification and state unsold plots should be returned to the developer after 12 months; E.184 suggests discounting self/custom build from affordable housing requirement.

Site SR22 Allocation

- Rep E.13: Objects to SR22 exclusion; requests inclusion as small site or windfall under Policy T9. Provides reasons (transport, land status, no coalescence risk, local support, alignment with Neighbourhood Plan, appeal decisions). Proposes:
 - Amend policy to support small-scale windfall (1–3 units) linked to Register.

- Recognize Permission in Principle (PiP) for small self-build schemes.
- Include SR22 as allocation and amend supporting text to favor PiP on rural edge land.

Environmental Risk

- Rep E.68: Warns of pollution risk; policy should reference SuDs, wastewater management, and hierarchy of non-mains solutions (Policy DM1).

Marketing Period

- Rep E.82: 12-month marketing + 3-month council option is onerous; suggests 6 months or flexible timescale.

Viability

- Rep E.82: Questions assumption of 35 dph for self-build; suggests lower density and better evidence.

Design Code

- Rep E.122: Supports policy but wants design code at outline stage and free pre-app discussions.
- Rep E.190: Finds design code wording ambiguous; prefers guidance from Local Plan design policies.

Flexibility

- Rep E.171: Seeks flexibility on provision level, servicing, and affordable housing link.

Terminology

- Reps E.117, E.190: Concern over term “attractive”; unclear and contradicts placemaking.

4% Requirement on 100+ Sites

- Reps E.117, E.184: Concern about overprovision; E.184 suggests flexibility if demand falls.

Timing of Servicing

- Rep E.184: Challenges early servicing requirement; suggests phasing agreement.
- Rep E.190: Early provision could make site undeliverable.

Response:

Some changes could be addressed through suggested amends where recommended by the inspector. These could include the aspect of whether plots could be considered affordable if they met the NPPF definition, and the removal of the word attractive.

Additionally, a topic paper has been prepared.

T10: Gypsy, Travellers and Travelling Showpeople

7 representations have been received from the following consultees:

ID	Name	Stakeholder
901	Satinder Shokar	Member of public
1482	Alison Heinee	Member of public
1601	Mrs Gillian Mulloy	Member of public
E.1	D Ambrose	Member of public
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.153	Maidstone Borough Council	MPs, Members and Parish Councils

Support

Respondents acknowledge the tightening of criteria for the safeguarding of existing sites and new sites and agree with the intensification of existing sites. There is general support for the policy and with regards to retaining existing sites, emphasising the importance of adequate facilities at the Meresborough Road site.

Issues:

- Identified Gypsy and Traveller Need isn't a true reflection of need and doesn't account for the change in PPTS definition and travel for social/cultural purposes, which will increase need (1482).
- Unrealistic list of exceptions which could prevent provision. Amend policy to show greenbelt sites are appropriate locations for traveller sites (1482).
- More realistic approach needed to determine planning applications for new sites and identifying acceptable sites as there isn't enough evidence to support intensification/expansion of existing sites (1482).
- The recommendations of the GTAA have not been taken forward and needs of the G&T community are not being met (901).
- Recommend the 'new sites' section of Policy T10 is amended to mention requirements of foul drainage (E.68)
- Not in support of intensification of Cuxton site due to lack of environmental and amenity assessments and community consultation (1601). Overall lack of evidence.
- Need proposed site allocations to meet the identified needs of Gypsy, Traveller and Travelling Showpeople households. It is unclear how the LPA intend to demonstrate deliverable 5 year supply of sites upon adoption (E.153)

Response:

The G&T Needs Addendum is included as part of evidence base documents which reflects PPTS change changes overall need. A topic paper has also been prepared to support the policy approach.

T11: Small Sites and SME Housebuilders

11 representations have been received from the following consultees:

ID	Name	Stakeholder
E.49	Kent SME Network	Developer or Agent
E.60	Mr HG and Mrs DR Kemsley	Developer or Agent
E.76	Abbey Developments	Developer or Agent
E.80	Home Builders Federation (HBF)	Developer or Agent
E.83	Terance Butler Holdings	Developer or Agent
E.84	Diocese of Rochester	Developer or Agent
E.104	Medway Liberal Democrats	Developer or Agent
E.117	Nightingale Homes	Developer or Agent
E.122	Catesby Strategic Land Limited	Developer or Agent
E.153	Maidstone Borough Council	Statutory Bodies

Support

Comments received were supportive of the policy and the 60 dwelling threshold. It was mentioned that the policy provides a degree of assurance and certainty for SMEs to deliver housing.

Issues:

- 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 (E.80).
- 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 (E.84)
- 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 (E.117).
- Policy is unnecessary and adds no value. Delete Policy and integrate support for SMEs into broader housing policies (E.122).
- Amendment to fix a typographical error (E.153).

Response:

Noted. No change required.

7. Economic Development

S10: Economic Strategy

22 representations have been received from the following consultees:

ID	Name	Category
4368	Mr Graham Hunt	Member of public
4546	Blueberry Homes	Developers or Agents
4834,4867,5030	Mrs Gillian Mulloy	Member of public
4956, 4957	Ms Karen Scott	Member of public
E.4	Sidney Anning	Member of public
E.20	Yvonne Tatnall	Member of public
E.42	Peter Court for Port Medway Marina	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.116	Blue Harbour Investment Ltd	Developers or Agents
E.117	Nightingale Homes	Developers or Agents
E.121	Stantec for Goodman	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.124	National Grid	Statutory Bodies
E.123	DHA for Veetee Rice Ltd	Developers or Agents
E.147	Uniper	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.153	Maidstone Borough Council	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents

Support

Support for this policy was in the form of general support for the economic strategy as well as support for the policy highlighting the importance of the policy with a link to transport opportunities for employment purposes.

Issues:

- Seeking clarification on what key regeneration opportunity areas ' refers to (4546).
- Concern raised over delivery, lack of market evidence, not realistic, past failure to deliver (4834).
- Loss/relocation of Chatham Docks (E.4) and Medway City Estate (E.20).
- Alternative commercial space required for businesses to move from Medway City Estate (E.116).
- Lack of regional context and cross-boundary cooperation (E.122).
- Text amendment to emphasise role of Kingsnorth and Isle of Grain to accommodate relocation of businesses from Medway City Estate (E.150).
- Lack of public investment and loss of office space to residential (E.115).
- Lack of reference to employment need quantum raising DtC issues (E.153).
- Economic Strategy needs to explicitly address the relocation of existing users at the Medway City Estate (E.157).

Response:

Policy S10 attracted a range of objections. A number referred to Chatham Docks while others raised issues with the use of Kingsnorth expansion in providing new employment floorspace linked to relocation of occupiers from Chatham Docks and Medway City Estate.

Some stakeholders requested more detail to be included within policy.

Some stakeholders raised objections to issues which are within the context of the Medway economy but which go beyond the realms that a spatial economic policy can cover, relating more to general economic pressures. Also, the impact of PDR is a challenge that the Local Plan has to adapt to and a policy cannot attempt to counter this, rather it needs to offer an element of flexibility as promoted by the NPPF.

S11: Existing Employment Provision

16 representations have been received from the following consultees:

ID	Name	Stakeholder
4963,	Mr Richard Carpenter	Members of the Public
4834, 4836, 4868,	Mrs Gillian Mulloy	Members of the Public
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.42	Port Medway Marina	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.121	Goodman	Developers or Agents
E.123	Veetee Rice Ltd(DHA on behalf of)	Developers or Agents
E.124	National Grid	Statutory Bodies
E.136	Hutchison Ports	Developers or Agents
E.147	Uniper	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.181	Zurich Assurance Limited	Developers or Agents

Support

A number of general supportive comments were made. Most relate to support for the recognition for the need to protect existing employment sites in Medway.

Issues:

- Concern over impact of PDRs on employment allocations, concern over previous failed promises of economic benefits (4834).
- Fails to meet key NPPF requirements (paras 20, 35, 36, 85, 92, 16c), Lack of connection to education and skills nor tackle decline of small businesses and retail (4836).
- Support for protection of Chatham Docks (4963, E.115).
- Various concerns over Kingsnorth employment site viability - traffic congestion, lack of consultation, lack of connection to Neighbourhood Plans (E.41).

- Requesting certain employment sites on Hoo Peninsula marked as existing employment sites (E.121).
- Policy lack of clarity between allocated employment sites and need for policy compliance (E.123, E.150).
- Concern over 12-month marketing requirement in policy (E.123).
- Request for flexibility in use classes and quality-of-life test suggested for housing on industrial land (E.115).
- Policy too rigid – not able to allow ancillary facilities (E.181).
- Policy does not reflect the new requirements of the NPPF Para 125 (c) - RE in identifying substantial value to be attached to use of brownfield land, as well as a proposal which meets identified need should be approved unless there is 'substantial harm' (E.181).

Response:

Similar to policy S10, a range of objections were raised to policy S11 – a number of which go beyond the remit of an employment policy. Some comments requested greater detail to be added to make the policy stronger, while others requested a need for greater flexibility. No change required.

S12: New Employment Sites

10 representations have been received from the following consultees:

ID	Name	Stakeholder
4586	Mr Rupert Turpin	Members of the Public
4953	Mr Richard Carpenter	Members of the Public
E.47	Esquire Developments (Flanders Farm)	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.121	Goodman	Developers or Agents
E.123	Veetee Rice Ltd (DHA on behalf of)	Developers or Agents
E.147	Uniper	Developers or Agents
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.184	Hoo Consortium	Developers or Agents

Support

A number of general supportive comments were made to this policy. Most relate to support for the recognition for the need for new employment sites in Medway. Some related to recognising the importance of specific sectors.

Issues:

- Concern over linked infrastructure delivery, under-utilised employment space and loss of Chatham Docks (4586, E.115).
- Querying appropriateness of digital sector growth for Medway (E.115).
- Request for brownfield employment sites to be phased before greenfield (E.121).

- Support for use of greenfield sites on Hoo Peninsula in parallel to brownfield sites (E.184).

Response:

A number of responses were received in relation to policy S12. Most comments were in support of the policy. The objections covered a number of issues in relation to Chatham Docks, employment sectors and greenfield & brownfield sites. The Council does not view that modifications are necessary.

T12: Learning and Skills Development

8 representations have been received from the following consultees:

ID	Name	Stakeholder
4369	Mr Graham Hunt	Members of the Public
4865, 4911	Mrs Gillian Mulloy	Members of the Public
4958, 4959	Ms Karen Scott	Members of the Public
E.52	University of Kent	Other
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

Stakeholders broadly back the education policy while urging sharper focus on provision and pathways. There were requests to expand post-16/further education routes beyond traditional university to raise skills and the need to support digital skills programmes to widen career options. Comments welcome recognition of universities' role and ongoing support that enables operations to be sustained and enhanced. Other see the policy as strengthened.

Issues:

- Education policy fails to target deprived areas or align with local workforce needs. Notes lack of demand analysis, delivery targets, and monitoring. (4865).
- Concern that the Medway Local Plan may not meet its legal duty, has no Equality Impact assessment. The plan is unsound, does not meet legal compliance and soundness if it promotes AI as a "key growth sector" but fails to assess AI-related risks. (4911)
- 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. (E.115)

Response:

Noted. The Council does not consider that a change is required.

T13: Tourism, Culture and Visitor Accommodation

6 representations have been received from the following consultees:

ID	Name	Stakeholder
4776	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
E.42	Port Medway Marina	Developer or Agent
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies
E.149	St Andrews Leisure Development Ltd	Developer or Agent
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

Representations support the policy while noting development of rural and marine based tourism is important and welcomes the Council's commitment to explore opportunities for nature- based tourism and build upon existing opportunities including the King Charles III England Coast Path.

Issues:

- 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 (E.115).
- Requests policy T13 specifically references St Andrews Lake to cover the site and such uses and more widely 'leisure and tourism site' (E.149).

Response:

Noted. The Council does not consider modifications are required.

S14: Supporting Medway's Culture and Creative Industries

10 representations have been received from the following consultees:

ID	Name	Stakeholder
4338	Catherine Waterman	Members of the Public
E.52	University of Kent	Other
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.158	Option Two Development Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents

E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents

Support

These comments centre on general support for example from those who value the sector and are behind it being supported in the Local Plan and the higher education sector with their comments having been included since the Regulation 18 consultation.

Issues:

- Request for greater clarity in relation to threshold referred to in policy – as undefined in Local Plan contrary to NPPF para. 16d. (E.143, E.166).
- Support for preserving historic areas, tackling unattractiveness of town centres and providing planning flexibility to focus on public sector investment and reduce crime (E.115).
- Policy suggestion to pick up on viability issues with provision of public art (E.158).
- Greater clarity required on term ‘major development’ - include definition (E.167, E.168).

Response:

This policy attracted a relatively small number of comments/objections. A number related to requests for greater clarity around policy wording and definitions, which may strengthen policy.

T14: Rural Economy

18 representations have been received from the following consultees:

ID	Name	Stakeholder
4370	Mr Graham Hunt	Members of the Public
4600	AC Goatham & Son	Developers or Agents
4609	CPRE Kent	Voluntary and Community Organisations
4777	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.42	Port Medway Marina	Developers or Agents
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.65	P Sharp	Members of the public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

E.117	Nightingale Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

The comments are in general support of the policy and raise some matters for consideration captured below.

Issues:

- Standalone policy for loss of agricultural land is needed. Reference should be made to agriculture and the contribution it makes to the rural economy (4609).
- Concerns over loss of high-grade agricultural land and impacts e.g. harming the rural economy (E.37, E.41 and E.44).
- 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 (E.65).
- 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 land near Cuxton and Halling (E.104).
- 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 (E.115).
- 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 would recommend such a policy is included (E.148).
- "Employment uses" are undefined, risking overly restrictive interpretation. Suggests defining uses in line with Use Class E and community facilities (E.166, E.167 and 168).

Response:

The Council does not consider that modifications are required.

8. Retail and Town Centres

S15: Town Centres Strategy

8 representations have been received from the following consultees:

ID	Name	Stakeholder
4548	Blueberry Homes	Developers or Agents
4611	CPRE	Voluntary and community organisations
5014	Mr Bryan Fowler	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.184	Hoo Consortium	Developers or Agents
E.83	Terance Butler Holdings	Developers or Agents

Support:

Comments included the need for Chatham and Gillingham to have a proactive retail strategy beyond place hierarchy with designated parking to support retail growth.

Issues:

- Object – the policy does not support small scale retail and service uses as part of major residential or mixed use schemes. (4548).
- Questions whether new local/rural centres will be sustainable, e.g. Pedestrian crossing over A228 – how will cyclists cross over?
- Disagree with the Pentagon being at the top of the hierarchy (E.104).
- Include a policy for support of local and farmers' markets (E.104).
- Overprotection of town centres - has limited alternative development and economic growth (E.104).
- Public transport requires investment and demand (E.104).
- Recommendation to shrink retail zones to a core area and repurpose excess space for housing and workspaces (E.115).
- 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 floorspace) (E.184).

Response:

New retail within major developments will be determined through the development management process on a case by case basis.

A bespoke approach is taken for some centres to compress the retail frontage on the high street enabling other uses to diversify along the remaining high street. This approach will not suit all high streets.

Requirements of policies are suggested to ensure sustainable movements and maintenance of retail hierarchy.

S16: Hierarchy of Centres

5 representations have been received from the following consultees:

ID	Name	Stakeholder
4612	CPRE Kent	Voluntary and Community Organisations
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.184	Hoo Consortium	Developers or Agents

Support

There is some support for this policy.

Issues:

- Questions whether new local/rural centres will be sustainable, e.g. Pedestrian crossing over A228 – how will cyclists cross over? (4612).
- New centres should be integrated into large developments with schools and health facilities (E.115).
- 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.
- General comment made regarding cross referencing to other policies from this policy (E.115)
- Mention made of Hempstead Valley Shopping Centre and Dockside being more appropriate in the “out-of-town” shopping centres section (E.104).

Response:

The Council views that no changes are required.

T15: Sequential Assessment

3 representations have been received from the following consultees:

ID	Name	Stakeholder
4549	Blueberry Homes	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.181	Zurich Assurance Limited	Developers or Agents

Support

There is some support for this policy.

Issues:

- Remove duplication with national policy (4549).
- Objection: The policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17 (4549, E.181).
- 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 (4549).
- 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. (4549, E.181).

Response:

The Sequential approach set out is localised to Medway's context, but still remains compliant with national policy, therefore not duplicating.

No changes proposed.

T16: Ancillary Development

2 representations have been received from the following consultees:

ID	Name	Stakeholder
4550	Blueberry Homes	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

General support.

Issues:

- States revised wording of policy is confusing. Objects to need for policy T16, which is covered by T15 and 17. Suggests removing policy T16 (4550).

- 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 (E.104).

Response:

Suggest amendment to policy: ‘Ancillary development proposals for main town centre uses outside centres are required to be compliant with the sequential and impact tests where triggered unless the ancillary proposal can demonstrate the following:.....’

Amend the second sentence and move below e.: ‘The sequential and impacts tests undertaken should be proportionate to the scale of the proposal.’

T17: Impact Assessment

7 representations have been received from the following consultees:

ID	Name	Stakeholder
4551	Blueberry Homes	Developers or Agents
E.51	Endeavour Gillingham Limited	Other
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.181	Zurich Assurance Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

N/A

Issues:

- Concerns with the detailed requirements of Policy T17, including; thresholds, impact assessment and object to wording of final paragraph (4551).
- The requirement for an impact test is contrary to NPPF. Object to this requirement. 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 (E.51).
- 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 and Horsted (E.104).
- Restrictions limiting district retail development to protect town centres may hinder wider economic growth (E.115).
- 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 (E.181).

- 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) (E.181).
- 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 should be exempt from draft Policy T17 (E.184).

Response:

The approach to locally specific and setting local thresholds.

The Council supports some modifications to strengthen policy wording, clarification of network gross figures. Provide clarification of gross or net figure.

S17: Chatham Town Centre

6 representations have been received from the following consultees:

ID	Name	Stakeholder
E.52	University of Kent	Other
E.68	Environment Agency	Statutory Bodies
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

There is some support for this policy.

Issues:

- 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 (E.68).
- Subsection 6 – do not permit ground floor residencies on the High Street within the prime shopping zone as shown on the town centre plan (E.104).
- Concerns expressed about parking and public transport links are needed (E.115).
- The town centre needs improvements to the environment to make it more attractive (E.115)

Response:

No changes required.

S18: Rochester District Centre

1 representation has been received from the following consultee:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

This policy is supported.

Issues:

No Issues logged.

Response:

No issues logged requiring a response.

S19: Gillingham District Centre

4 representations have been received from the following consultees:

ID	Name	Stakeholder
4514	Mrs Elizabeth Poynter [1564]	Members of the Public
4552 - 4553	Blueberry Homes [694]	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

This policy is supported and some minor changes proposed to the policy wording.

Issues:

- Regeneration doubts - no credible plan; planning restrictions are a barrier. Developer-led approach recommended with clear design and environmental standards (E.115).

Response:

No changes required.

S20: Strood District Centre

8 representations have been received from the following consultees:

ID	Name	Stakeholder
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4515	Mrs Elizabeth Poynter	Member of the public
4552	Blueberry Homes	Developer or Agent
E.32	Michael McEvoy	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.184	Hoo Consortium	Developer or Agent

Support

General support for the policy with some amendments suggested to the wording of the policy.

Issues:

- The Plan ignores the extra pressure West Strood will place on Strood's district-centre services and facilities (E.32).
- 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 sites can be found to be sound (E.68).
- Farmers market potential as high footfall makes Strood suitable. There are also regeneration challenges e.g. nearby deprivation (E.115).
- 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 (E.184).
- 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 masterplanning process (E.184).

Response:

Response to the Environment Agencies comments have been prepared and captured as part of the Statement of Common Ground.

No response required.

S21: Rainham District Centre

Four representations have been received from the following consultees:

ID	Name	Stakeholder
4647	Mr Russell Smith	Members of the public
4695	Mr Ray Holton	Members of the public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

One representation supports this policy.

Issues:

- General comments made that parking and rental charges prevent growth of this centre. (4647, 4695, E.115) .
- Investment and improvements to its appearance is needed (E.115).
- Rail station plans not reflected in the Local Plan as well as ongoing work with Rainham Reimagined (E.115).

Response:

No changes required.

S22: Hoo Peninsula

11 representations have been received from the following consultees:

ID	Name	Stakeholder
4926	Ms Jamie Summers	Members of the public
4601	AC Goatham & Son	Developers or Agents
4613	CPRE Kent	Voluntary and Community Organisations
4900	Kitesfield Estates Limited	Developers or Agents
E.47	Esquire Developments (Flanders Farm)	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.122	Catesby Strategic Land Limited	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

General support for the policy and its ambitions to deliver a supermarket and new local services. These will support sustainability objectives and encourage walking, cycling and use of public transport while reducing private vehicle use.

Issues:

- Unsound development strategy. New shopping facilities and associated housing at expense of the environment (4613).
- Ambiguous spatial direction, unclear regarding infrastructure delivery and lack of mapping. Add spatial designations, delivery triggers, and infrastructure commitments (E.122).
- Concerns regarding the road infrastructure and traffic. Need more evidence and detail to demonstrate that the road infrastructure is fit for purpose (E.115, 4926, E.157).
- 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. (E.157).
- 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 (E.177).
- 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 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. 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 (E.184).

Response:

Policies are meant to be read together. No change required.

S23: Hempstead Valley District Centre

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.51	Endeavour Gillingham Limited	Other
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

Issues:

- The requirement for an impact test is contrary to NPPF. We object to this requirement. Accordingly an amendment to delete Hempstead Valley from policy S23 is sought (E.51).
- 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 (E.104).
- 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 (E.115).

Response:

The approach taken is locally specific to ensure maintenance of the retail and entre hierarchy.

DM12: Local and Rural Centres

2 representations have been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.161	Peel Waters	Developers or Agents

Support

Support for this policy is expressed.

Issues:

- Recommends amendments to fix typographical errors as well as some additional retail areas to be listed and upgraded (E.104).
- 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 (E.161).

Response:

This could be addressed through minor amendments regarding LC18, the existing centre.

Planned growth along the river waterfront is not in-keeping with the retail evidence base. Determine appropriateness through the masterplan and planning application.

T18: Shopping Parades and Neighbourhood Centres

2 representations have been received from the following consultees:

ID	Name	Stakeholder
4451	Trenport Investments Ltd	Developer or Agent
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

There is general support for this policy.

Issues:

- The policy could go further to specify that the Mixed-Use Community Hub will provide all local residents with access to key services within a sustainable location of the village (4451).
- Reservations about the lack of protection for the majority of rural areas and think these areas should be uprated to be included as rural centres (E.104).

Response:

Noted. No changes required.

T19: Meanwhile Uses

1 representation has been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

This policy is supported.

Issues:

- No issues logged

Response:

No issues logged that require a response.

DM13: Medway Valley Leisure Park

2 representations have been received from the following consultees:

ID	Name	Stakeholder
E.42	Port Medway Marina	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

There is general support for this policy.

Issues:

- Development should not be limited to protect town centres (E.115)

Response:

No change required.

DM14: Dockside

2 representations have been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

There is general support for this policy.

Issues:

- Development should not be limited to protect town centres (E.115).

Response:

No change required.

9. Transport

DM15: Monitoring and Managing Vehicle Trip Generation

14 representations have been received from the following consultees:

ID	Name	Stakeholder
1523	Tonbridge and Malling Borough Council (Mr Bartholomew Wren, Principal Planning Officer)	Statutory Bodies
E.49	Kent SME Network	Developers or Agents
E.85	National Highways	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.123	Veetee Rice Ltd	Developers or Agents
E.137	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.150	Mr Kevin Rice	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents

E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

General support of the policy and the monitoring and management approach. It is noted that the LCWIP travel schemes are not yet 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.

The policy is supported but needs further clarity on trip-credit obligations, exemptions, and enforcement and more reference to the IDP with contingency for failed measures, and proven evidence for behavioural strategies, to ensure deliverability and compliance with NPPF requirements.

Issues:

- Object to exempting all urban centres from monitoring and managing. Any exemption must require full compliance with policy first, otherwise the exemption is contradictory. Suggest an Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy (104)
- 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. Road infrastructure is inadequate and public transport is insufficient, especially for employment hubs like BAE Systems (115)
- Publishing a Medway-wide Monitor and Mitigation Strategy is essential evidence for the Infrastructure Delivery Plan and Local Plan viability (137)
- The wording of the policy must 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 (143)
- Policy lacks clarity on “materially lower”; and term must be further defined. There is a need for an updated IDP, explain trip-credit methodology to ensure deliverability and consistency (123,150, 166, 167, 168)
- Questioning Pier Road gyratory’s principle and design. Current layout ignores pedestrian/cycle needs despite Peel’s prior funding for SM16 (161)
- Queries small/ medium-scale allocations and those in urban centres not included in vehicle trip credit when they will create trips/ impacts; further clarity needed on the mechanism for reallocation of trip credits and this should be monitored and managed by Medway Council. The approach lacks defined budget and needs detailed methodology (184)

Response:

The Vehicle Trip Credit Topic Paper has provided more information. Modifications to the Medway Local Plan 2041 will be required.

T20: Riverside Path

6 representations have been received from the following consultees:

ID	Name	Stakeholder
694	Blueberry Homes	Developers or Agents
574	Sports England (Mr Bob Sharples)	Statutory Bodies
E.61	Port of London Authority	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.161	Peel Waters	Developers or Agents

Support

Comments of support welcome the inclusion of its Active Design Guidance in Policy T20. The proposed changes are supported including reference to the need for development proposals to include riparian lifesaving equipment and appropriate suicide prevention measures where necessary. The use of Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance is supported to deliver the aspiration.

Issues:

- It is 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. (694)
- 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. (694)
- Concerned about funding a new crossing (E.115).

Response:

No change required.

DM16: Chatham Waters Line

4 representations have been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.161	Peel Waters	Developers or Agents
E.164	Network Rail	Statutory Bodies

Support

This policy is supported.

Issues:

- The transport opportunity is supported but suggest alternative land uses if the scheme doesn't progress by 2041. (115)
- Supports active travel corridor; recommends extending the route to Gillingham station and updating policy wording to reflect this. The absence of this means that the Policy may be unsound. (E.164)

Response:

Noted. No change required.

DM17: Grain Branch

14 representations have been received from the following consultees:

ID	Name	Stakeholder Voluntary and Community Organisations
29	Railfuture Ltd (Mr Roger Blake, Director, Infrastructure & Networks) [29]	Business
865	Mr Graham Hunt	Members of the Public
1155	CPRE (Kent)	Voluntary and Community Organisations
1571	Ms Georgina Kosanovic	Members of the Public
1564	Mrs Elizabeth Poynter	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members Statutory Bodies
E.115	Medway Conservative Group	MPs, Members Statutory Bodies
E.122	Catesby Strategic Land Limited	Developers or Agents
E.124	National Grid	Statutory Bodies
E.132	Allhallows Parish Council	MPs, Members Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

There is general support this policy and suggests reference update to be made to reference the rail study (Network Rail's Kent Route Study' consider referencing, 'North & East Kent Connectivity Modular Strategic Study of Spring' 2023). There is support for Peninsula development with an extension of the rail line to support transport needs.

Issues:

- Objects to the policy due to concern that grain branch line will result in modal shift and concerns over infrastructure delivery plan gaps and absence of rail schemes. There is a underline the importance of sustainable travel options in the context of land allocated under SA8 (1155).
- Objects to policy DM17 and requests that 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 (104).
- 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) (104).
- Sharnal Street should not be treated as a terminus; the Grain line should be considered for future passenger services to Grain (104).
- Policy naming and mapping should reflect the full Grain Branch by hatching the line continuously to Grain rather than stopping at Sharnal Street (104).
- The viability of reopening the rail line given scaled-back housing plans for the Hoo Peninsula is questioned (115).
- It is noted that there is considerable funding deficit meaning there is limited prospect of immediate upgrade, and that the prospects of establishing fully sustainable travel patterns at the Hoo Peninsula are therefore diminished (132, 157).
- Lack of funding and proposals hinder Strood station upgrades, risking unsound policy without integrated transport to support regional growth (164).
- Alternative land uses should be considered where need is demonstrated and the railway station not be delivered within a reasonable timeframe (177)
- Objects to policy as Grain Branch requires modification to provide a clear release mechanism so as not to hinder/ slow delivery of Site HHH31. Suggest amendment to policy DM17 to 'provide release mechanism' for delivery of site HHH31 (184)

Response:

In line with national planning policy, sites and routes should be protected, where there is robust evidence, in developing infrastructure to widen transport choice and realise opportunities for large scale development. Network Rail included the Grain Branch in the final Kent Area Route Study as part of Network Rail's 30-year strategic vision and options for third party funders. Therefore, the policy is considered to be justified.

T21: Riverside Infrastructure

8 representations have been received from the following consultees:

ID	Name	Stakeholder
1564	Mrs Elizabeth Pynter	Member of public
E.42	Port Medway Marina	Developers or Agents
E.61	Port of London Authority	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.124	National Grid	Statutory Bodies
E.136	Hutchison Ports	Developers or Agents
E.148	Natural England	Statutory Bodies

E.161	Peel Waters	Developers or Agents
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Support

Representations support the safeguarding of existing riverside infrastructure and supports inclusion of text regarding unreasonable restrictions and acknowledges improved specificity, and welcome the inclusion of Gillingham Pier, Sun Pier and Rochester Bridge.

Issues:

- Suggest riverside infrastructure needs the inclusion of Chatham Docks.
- River infrastructure should not impact existing businesses or have unreasonable restrictions imposed (42)
- Object to the policy and recommend the policy wording is strengthened to make it clearer how developments will be assessed during their determination as follows, '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.' (148)
- It is suggested that the following is added to the beginning of the policy, 'Unless allocated for alternative development' at the beginning of the policy'. (E.161)

Response:

Modifications to the Medway Local Plan 2041 may be required to address representations concerning the requirements to conserve designated environmental features.

T22: Marinas and Moorings

5 representations have been received from the following consultees:

ID	Name	Stakeholder
1663	National Bargee Travellers Association (Ms Pamela Smith, Chair	Voluntary and Community Organisations
E.42	Port Medway Marina	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies

Support

This policy is supported with the inclusion of boatyards and drydocks.

Issues:

- Objection: The policy neglects residential moorings, ignores boat dwellers' needs, and fails to meet Housing Act 2016 obligations. 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 (1663).
- Object to Policy T22 as wider discussion around transport is at the heart of the local plan process (E.115).
- Recommend policy wording which more closely reflects requirements of Policy S2. See suggested amendments. (E.148)

Response:

Modifications to the Medway Local Plan 2041 may be required to ensure Policy T22 is in line with Policy S2.

T23: Aviation

8 representations have been received from the following consultees:

ID	Name	Stakeholder
4522	Mrs Elizabeth Poynter	Members of the Public
E.34	Bill McLennan	Members of the Public
E.38	Joe Fallarino	Members of the Public
E.100	James Brewood	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.188	John Connelly	Members of the Public

Support

There is general support for this policy and with hopes that there will be further commitment from the council to work with the operators of the airport to deliver on this vision.

Issues:

- Suggestion of airfield on Hoo Peninsula to support tourism and aviation heritage (4522).
- Policy is unsound and should be withdrawn as it clashes with national policy (E.34, E.38, E.100). E.34 & E.100 specify failing to avoid or mitigate environmental harm (NPPF para109). E.34 is also lists these clashes: neglecting brownfield prioritisation (para 125) and bypassing proper Duty to Cooperate processes.
- The airfield land should be considered for higher value development (E.34, E.38).
- Recommends the policy is amended - to ensure that significant impacts to the Kent Downs National Landscape and its setting are avoided. Also 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. (E.148)
- Concerned with Aviation fuel pipe risks (E.188)

Response:

Noted. No changes required.

T24: Urban Logistics

3 representations have been received from the following consultees:

ID	Name	Stakeholder
4523	Mrs Elizabeth Poynter	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents

Support

There is support for this policy. Comments suggest the use of vacant sites on Gillingham Business Park for the logistics sector to tackle employment space lost to residential.

Issues:

- Suggests amending policy to incorporate the statements made in paragraphs 9.8.2, 9.8.4 and 9.8.6. (E.104)
- 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.
- Whilst the approach to this policy is reasonable there is the potential conflict with the proposed allocations that would themselves result in the direct loss of some potential operational sites. (E.117)

Response:

Noted. No change required.

T25: User Hierarchy and Street Design

7 representations have been received from the following consultees:

ID	Name	Stakeholder
4581, 4582	Mr Leslie Brown	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents
E.204	Kent County Council	Statutory Body

Support

Supporting comments related to: a request to add 'disabled access' to policy, general acceptance of policy and site-specific references to pedestrian/cyclist access as well as request for further transport testing.

Issues:

No issues logged.

Response:

No issues logged requiring a response.

T26: Accessibility Standards

13 representations have been received from the following consultees:

ID	Name	Stakeholder
4373, 4374	Mr Graham Hunt	Members of the Public
4615	CPRE Kent	Voluntary and Community Organisations
4524	Mrs Elizabeth Poynter	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.122	Catesby Strategic Land Limited	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.190	Catesby Strategic Land (Lower Rainham Road)	Developers or Agents

Support

Supporting comments related to: the need for local neighbourhood principle to apply to schools to reduce traffic congestion, discouragement of private car use for school trips and policy to tackle illegal e-scooter use.

Issues:

- Amend policy in reference to inclusion of e-scooters (4373).
- Rename policy '15-minute neighbourhood' (4615). Where 15-minute active travel is unachievable, permit exceptions with required mitigations (E.104).
- 15-minute city concept unrealistic for Medway due to geography and travel patterns (E.115).
- Make reference to Fast Track Services (as in policy SA6, SA8 and SA9) (4615).

- Prioritise cycling and public transport for all key places except primary schools (E.104).
- Target: key services (shops, schools, healthcare) within 15 minutes by walking or cycling; allow justified exceptions (E.104).
- New housing must connect to bus network and be within a 15-minute walk of a bus stop (E.104).
- Developers must provide walking, cycling or public-transport access to train stations (E.104).
- Achieving this requires more investment in bus frequency and affordability to cut car dependence (E.104).
- Poor public transport and lack of investment in rail stations (E.115).
- Criticism as unrealistic expectations on rural areas/need to consider location of site (text suggestion made) – need flexibility (E.122, E.143).
- Greater clarity required around development thresholds – not clear at what points policy applies therefore not consistent with NPPF (E.166, E.167, E.168).
- Policy not effective (E.190).

Response:

Noted. No change required.

DM18: Transport Assessments, Transport Statements and Travel Plans

12 representations have been received from the following consultees:

ID	Name	Stakeholder
4375	Mr Graham Hunt	Members of the Public
4583	Mr Leslie Brown	Members of the Public
E.3	Nicholas Hance	Members of the Public
E.49	Kent SME Network	Developers or Agents
E.103	Philip Badman	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.184	Hoo Consortium	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

Supporting comments related to a wide range of issues: request for update to a Medway Travel Plan, highway upgrades, request for a Development Corporation to coordinate village expansion proposals, clarity over term 'significant amount of movement', reference to 'sign off by National Highways' needs updating to comply with NPPF, amend in policy wording use of acronyms for example SRN and support from neighbouring authority for joint working on transport issues.

Issues:

- Concern over increase in traffic on Hoo Peninsula and need for highway upgrades (E.3).
- Concern over development on agricultural land and congestion and pollution – need early road funding (E.3).
- Need for up-to-date traffic/transport data/analysis, section 106 funding (E.115).
- Heritage impact from cross border developments which would worsen traffic (E.103).
- Lack of clarity in policy around Travel Plan agreement, implementation undermining policy (E.157).
- Greater consideration for rail network during allocation and application stage – need measurable targets and indicators for rail usage, service frequency and infrastructure delivery (E.164).
- Area wide travel plan to be supported by Sustainable Transport Strategy and Consortium Area-wide travel plan (draft) (E.184).

Response:

Noted. No change required.

DM19: Vehicle Parking

8 representations have been received from the following consultees:

ID	Name	Stakeholder
4530	Ms Georgina Kosanovic	Member of public
4584, 4585	Mr Leslie Brown	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents

Support

There has been a majority support of this policy.

Issues:

- Object as current standards are outdated and inadequate for modern households (E.115).
- Concerns about parking on pavements and disruption to the transport hierarchy, and developments being approved without traffic calming and footways, respectively. (4530, 4585)
- Parking plan is out of date (E.104)
- Supports the bespoke approach but suggests site by site assessment rather than minimums. (E.161)

Response:

Noted. No change required.

DM20: Cycle Parking and Storage

5 representations have been received from the following consultees:

ID	Name	Stakeholder
4376	Mr Graham Hunt	Member of public
E.94	Henry Langley	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.122	Catesby Strategic Land Limited	Developers or Agents

Support

Most comments support this policy.

Issues:

- Does not believe encouragement of e-bikes/e-scooters is legal, suggests removing this from Policy. (4376)
- Questions the long-term maintenance and opposes inclusion of e-scooters due to legal uncertainty. (E.115)

Response:

Minor Modifications to the Medway Local Plan 2041 may be required to remove references to e-bikes and e-scooters.

10.

11. Health, Communities and Infrastructure

T27: Reducing Health Inequalities and Supporting Health and Wellbeing

26 representations have been received from the following consultees:

ID	Name	Stakeholder
521	Mr Paul Hawkins	Members of the Public
574	Sports England (Bob Sharples)	Statutory Bodies
694	Blueberry Homes	Developers or Agents
1338	Lincoln Ritchie	Members of the Public
1571	Georgina Kosanovic	Members of the Public
1601	Mrs Gillian Mulloy	Members of the Public

E.5	Cllr George Perfect	MPs, Members and Parish Councils
E.10	Susan Bell	Members of the Public
E.14	Lyn Wiles	Members of the Public
E.26	NHS Property Services (NHSPS)	Statutory Bodies
E.47	Esquire Developments Flanders Farm	Developers or Agents
E.51	Endeavour Gillingham Limited	Other
E.68	Environment Agency	Statutory Bodies
E.101	Judith Masey	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.133	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents

Support

There has been support for this policy.

There is support for a new hospital to support population growth and support for the inclusion of Active Design Guidance.

Many of these goals within the policy should be converted into measurable conditions that can be evaluated by those that will be affected by them. Many of these goals should be converted into measurable conditions that can be evaluated by those that will be affected by them.

There is support of healthy lifestyles mentioned and it is suggested that a criterion (c) is added 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

Issues:

- Object due to lack of clear plan or investment from the government on medical infrastructure (5, 521).
- Policy is aspirational and questions deliverability and objects to the location of specific types of development being managed to avoid adverse impacts such as an off licence, as small scale stores will often include this and so should be excluded from policy (694).
- Policy T27 doesn't account for the decline of informal community health infrastructure (1601).

- The Health Impact Assessment Toolkit and Hot Food Takeaway Guidance Note are guidance documents and not binding and so fails to strengthen policy T27 (1601).
- Policy T27 lacks binding delivery mechanisms and measurable health outcomes. Calls for protections and relief for venues contributing to community health and circular economy and a Statement of Common Ground with NHS Kent & Medway ICB (1601).
- Object due to healthcare service challenges (GP and hospital in particular) and lack of infrastructure plan. 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 (5).
- Concern about home buildings impact on residential amenity (10).
- Concern about anti-social behaviour (14).
- Suggested modification: Delete ref to: 'places where children and young people congregate' (51)
- Paragraph 10.2 should be incorporated into policy T27 and there should identify the opportunities to maximise wider benefits for development sites and implement flood risk management schemes (68)
- Object to policy T27 as it fails to uphold nation policies on health and amenities (101)
- Suggest revising the Green and Blue Infrastructure Plan. Policy T27 paragraph 2 ss3 should include the provision that developers assist the supply and/or funding of new allotment spaces. (E.104)
- 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 (104)
- Concerns expressed on health care needs in Medway, the pressure and wait times and need for more staff. (115)
- The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan. (143)
- Urges for stronger Policy T27 alignment with Green Infrastructure Framework and retrofitting opportunities (148)
- Policy lacks clear definitions for development thresholds, risking inconsistency; clarification or appended definitions needed for NPPF compliance (166)
- 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 (167,168)

Response:

The Health topic paper provides background and explanation to the approach as well as updating progress on the Health Impact assessment Toolkit.

T28: Existing Open Space, Outdoor Sports and Play Spaces

4 representations have been received from the following consultees:

ID	Name	Stakeholder
4451	Trenport Investments Ltd (Sean Molyneux)	Developers or Agents
4436	Sports England (Mr Bob Sharples)	Statutory Bodies
E.53	Kelvin Carr	Members of the public

E.104	Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils

Support

Representation 4436 supports this policy also referencing The Playing Pitch Strategy and Built Facility Strategy expected to inform Policy T28.

Issues:

- 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. (4451).
- 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 (4451).
- 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 consultation (E.53).
- Item a) should be removed because reducing/removing public space always causes material harm; item b) should be the default for existing open spaces. Request to register historically proven commons and village greens (e.g., Grain Village Green, Frindsbury Green, Rede Common, Hook Meadow, Gillingham Green) and provide orientation boards (E104).
- 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. Stress the importance of maintaining sports facilities and criticise budget cuts affecting green space upkeep (E.115).

Response:

Noted. No change required.

DM21: New Open Space, Outdoor Sports and Play Spaces 10.3

19 representations have been received from the following consultees:

ID	Name	Stakeholder
4434	Sports England (Mr Bob Sharples)	Statutory bodies

4525	Mrs Elizabeth Poynter	Member of the Public
4556	Blueberry Homes	Developer or Agent
4602	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4664	Mr David Hopkins	Member of the public
4968	Mr Richard Carpenter	Member of the public
E.42	Port Medway Marina	Developer or Agent
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117, 800	Nightingale Homes	Developer or Agent
E.143	Taylor Wimpey & Persimmon Homes	Developer or Agent
E.148	Natural England	Statutory Body
E.161	Peel Waters	Developer or Agent
E.162	Kitewood Estates Limited	Developer or Agent
E.166	Bellway Strategic Land (Mierscourt Road)	Developer or Agent
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developer or Agent
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developer or Agent
E.182	Taylor Wimpey	Developer or Agent
E.204	Kent County Council	Statutory Body

Support

Comments generally centred around support for new open spaces including allotments and the need for strategies to guide and inform the policy.

Issues:

- 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 (4556).
- Flexibility requested - on site by site basis (E.42).
- The group calls for balance between open and private space and suggests the Council should provide allotments rather than developers. Expresses concern over the adequacy of S106 funding and question who will maintain new open spaces (E.115).
- Clarification sought on calculation of household size and number of bedrooms for older people accommodation (E.117).
- 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” (E.143).
- 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 (E.148).

- 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 (E.166, E.167 and E.168).

Response:

Noted. No change required. The Council has commissioned an updated evidence base in consultation with Sport England. This is reflected in an updated Statement of Common Ground.

T29: Community and Cultural Facilities

14 representations have been received from the following consultees:

ID	Name	Stakeholder
4557	Blueberry Homes	Developers or Agents
4860	Mrs Gillian Mulloy	Member of the public
E.26	NHS Property Services (NHSPS)	Statutory Bodies
E.42	Port Medway Marina	Developers of Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (Mierscourt Road) phase 1	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
H.6	Rehman Chishti	Member of public
H.18	Hindu Community of Medway	Voluntary and Community Organisations

Support

There has been general support for this policy.

Issues:

- The objection argues that the policy is unclear on whether healthcare facilities must meet both the general and additional healthcare-specific criteria. NHS Property

Services recommend the policy explicitly state that surplus declarations or estate reorganisation programmes are sufficient to satisfy its requirements (E.26).

- Need for a long term plan considering the ongoing GP crisis and aging infrastructure. Important that there is provision in the Local Plan for a new hospital.
- Policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan (E.115)
- The policies must be amended to define the circumstances under which they will be applied or definitions included within the appendices to the Plan (E.143)
- The development thresholds set out in policy are unclear and it is unclear under which circumstances policies are applied as policy (E.166)
- Amend 'large-scale' development to define the circumstances under which they will be applied or definitions included within the appendices to the Plan (E.171)
- Policy section relating to large scale development should be amended to avoid 'doubling up' on requirements. Should be confirmed that this will either be a provision of new community facilities or contributions to upgrading existing, not both (E.184)
- Objects to policy due to unenforceable policy language and warns of legal risks under CIL and PSED due to lack of measurable standards and protections for vulnerable groups.
- Advocate for the allocations of suitable land in Medway to develop an integrated Hindu Temple and Cultural Centre (H.18)

Response:

The Council would welcome changes to strengthen policy wording.

S24: Infrastructure Delivery

104 representations have been received from the following consultees:

ID	Name	Stakeholder
4340	Catherine Waterman	Member of public
4377	Mr Graham Hunt	Member of public
4437	Sports England (Mr Bob Sharples)	Statutory Body
4858, 4861	Mrs Gillian Mulloy	Member of public
5027	Mr Lincoln Ritchie	Member of public
E.5	Cllr George Perfect	MPs, Members and Parish Councils
E.10	Susan Bell	Member of public
E.14	Lyn Wiles	Member of public
E.16	Jill Lovell	Member of public
E.19	Claire Glover	Member of public
E.20	Yvonne Tatnall	Member of public
E.23	Nicola Smith	Member of public
E.24	Alison Wells	Member of public
E.25	Robert Wells	Member of public
E.26	NHS Property Services (NHSPS)	Statutory body
E.33	Katherine Baird	Member of public
E.36	Charlie Chester	Member of public

E.37	The Independent Group (TIG)	MPs, Members and Parish Councils
E.38	Joe Fallarino	Member of public
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils
E.46	Paul Davies	Member of public
E.48	Graham Page	Member of public
E.50	Alf & Sharon Wightwick	Member of public
E.63	Carol Pires	Member of public
E.65	P Sharp	Member of public
E.77	The City of Rochester Society	Voluntary and Community Organisations
E.82	St John's College	Developers or Agents
E.85	National Highways	Statutory Body
E.87	Lesley Harrison	Member of public
E.92	Brian Annenberg	Member of public
E.94	Henry Langley	Member of public
E.96	Gary Teague	Member of public
E.99	Marilyn Hawkes	Member of public
E.103	Philip Badman	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.105	Cyril Champness	Member of public
E.108	Ron Sands and Dawn Waller	Member of public
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.118	Gleeson Land	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.120	St James, Isle of Grain, Parish Council	MPs, Members and Parish Councils
E.127	Friends of Deangate Ridge Country Park Committee	Voluntary and Community Organisations
E.130	Linda & Antonio Riordan	Member of public
E.133	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.134	Esquire Developments (Rainham Parkside Village)	Developers or Agents
E.135	James O'Brien	Member of public
E.139	Robin Watkins	Member of public
E.142	Richard Gransden	Member of public
E.144	E Butcher	Member of public
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.159	Natalie Hale	Member of public
E.161	Peel Waters	Developers or Agents
E.163	Justine Percy	Member of public
E.164	Network Rail	Statutory Bodies

E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents
E.169	Elaine Cutting	Member of public
E.175	R M Gollay	Member of public
E.183	Lianne Brockwell	Member of public
E.184	Hoo Consortium	Developers or Agents
E.188	John Connelly	Member of public
E.189	Rob Gilbert	Member of public
E.191	Gravesham Borough Council	Statutory Body
E.196	Lynn Wilson	Member of public
E.197	Rachael Selleck	Member of public
E.199	Richard Bellingham	Member of public
H.2	Brian Clark	Member of public
H.4	Edward J Atkinson	Member of public
H.5	Linda Atkinson	Member of public
H.6	Rehman Chishti	Member of public
H.8	Professor Anan Shetty	Member of public
H.9	Hospital Petition_56 Signatures	Member of public
H.12	Kevin Miller	Member of public
H.14	Mr & Mrs Thomson	Member of public
H.15	David & Elaine Leggatt	Member of public
H.19	Michael O'Hanlon	Member of public
H.20	S O'Hanlon	Member of public
H.23	Eric Bishop	Member of public
H.24	Michael White	Member of public
H.25	Carol Driver	Member of public
H.28	Neil Harris & Marie-Jose Harris	Member of public
H.29	Christine Peek	Member of public
H.30	Steven Muspratt	Member of public
H.31	Meryl Lapthorn	Member of public
H.32	D A Lapthorn	Member of public
H.34	N J Miller & C D Miller	Member of public
H.35	Daphne Fritter	Member of public
H.36	M T Dennison	Member of public
H.37	Donald Baulk	Member of public
H.39	John Drake	Member of public
H.41	Kaitlan Murphy	Member of public
H.42	Stephen Murphy	Member of public
H.44	Anna Cole	Member of public
H.55	Stefan Davis	Members of the Public
H.56	A C Driver	Members of the Public
H.57	Marie Calvert	Members of the Public
H.59	High Halstow & St Mary Hoo Parish Council	MPs, Members and Parish Councils
H.63	Rochester Eco-Hub	Voluntary and Community Organisations

Support

Respondents broadly support the policy for its role in enabling sustainable growth and securing infrastructure. Key points include a strong endorsement of the Local Plan and emphasis on timely infrastructure delivery, support for evidence-based planning and developer contributions, with calls for flexibility in delivery methods, and general recognition of infrastructure's importance. Overall, comments affirm the policy's value while urging clearer delivery mechanisms, flexibility, and specific clarifications.

Issues:

Funding and Investment Uncertainty

- Lack of clarity on infrastructure funding/investment (4858, E.33, E.37, E.87, E.115, E.169, H.4, H.5, H.28, H.29, H.39).

Policy Soundness and Legal Risks

- Policy S24 considered unsound; lacks fixed triggers, costs, timing (4861, 5027).
- Exposure under CIL Reg 22; transparency failure; phasing weakened by viability override (4861).

Infrastructure Capacity and Service Strain

- Development exceeds infrastructure capacity (E.5, E.10, E.14, E.20, E.23, E.33, E.38, E.46, E.50, E.77, E.92, E.96, E.105, E.119, E.120, E.130, E.133, E.135, E.144, E.159, E.163, E.183, E.196, H.19, H.20, H.23, H.24, H.25, H.28, H.30, H.41, H.55).
- Specific concerns: utilities (E.5, E.46), healthcare/GPs/social care (E.20, E.33, E.38, E.130, E.135, E.144, E.159, E.196, H.55), roads/traffic (E.33, E.46, E.133, E.135, E.144, H.55), schools (E.135, E.144, E.159), Hoo Peninsula (E.119, E.120), Strood West (E.135, E.144).

Viability and Delivery Issues

- Lack or delayed infrastructure delivery (E.10, E.14, E.19, E.20, E.41, E.44, E.48, E.63, E.65, E.77, E.94, E.99, E.108, E.139, E.163, E.169, E.175, E.188, E.189, E.197, E.199, H.2, H.6, H.8, H.9, H.12, H.14, H.15, H.34, H.35, H.42, H.44, H.57, H.59, H.63).
- Specific mentions: healthcare/hospital (E.48, E.63, E.65, E.77, E.99, E.108, E.188, E.199, H.6, H.8, H.9, H.12, H.23, H.34, H.42, H.57), schools (E.19, E.99, E.108, E.175, H.34, H.57), flood risk (E.19, E.99, E.175), roads/transport (E.19, E.41, E.77, E.108, E.139, E.175, H.35, H.42, H.57, H.63), utilities (E.19, E.41, E.65), retail (E.19, H.12), policing (E.77), social spaces (H.42).
- Petition for new hospital (H.9, 56 signatures).
- Calls for "infrastructure first" (E.20, E.169).

Infrastructure Delivery Plan (IDP) Gaps

- Further work needed; legally inadequate evidence (E.24, E.25, E.127, E.118, E.184).
- Gaps identified (E.118); separate IDP for Hoo Peninsula suggested (E.184).

Policy Wording and Clarity

- Objections to wording (E.82, E.104): collaboration with providers should be evidenced; bullet a) unnecessary; rewrite paragraph 3 for clarity.
- Need clarity on sites, viability, contribution mechanisms (E.118, E.157, E.184).
- Policy too broad; viability concerns; transport mitigations questioned (E.161).

Community and Amenity Loss

- Concern that community needs not prioritized (E.103).

Suggested Improvements

- Conditions to secure infrastructure funding; early engagement with providers; flexibility for pre-commencement delivery (E.164).
- Additional greenfield sites to fund infrastructure and ensure soundness (E.167, E.168).
- Separate Hoo-specific infrastructure planning (E.184).
- Need for further infrastructure services/solutions (H.14, H.31, H.32, H.36, H.37; Hoo Peninsula noted in H.36, H.37).

Response:

Medway has prepared an updated Infrastructure Delivery plan and Developer contributions guide, which will address concerns raised/comments made.

DM22: Digital Communications

8 representations have been received from the following consultees:

ID	Name	Stakeholder
4859	Mrs Gillian Mulloy	Member of public
5028	Mr Lincoln Ritchie	Member of public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.168	Bellway Strategic Land (South of Moor Street) (Phase 1&2)	Developers or Agents

Support

Comments support the policy and recommend enhancing Policy DM22 by including open-access ducting and public Wi-Fi in town centres. Other comments support the policy, acknowledges recent amendments, and suggests rewriting paragraph 4 to incorporate long-term digital infrastructure requirements and ensure rollout during the plan period so that all areas of Medway have access by 2041

Issues:

- Concern supporting text / policy is based on incorrect baseline and suggests it is updated with current Ofcom/ BDUK data (4859).
- 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 (E.104).
- Urge better connectivity to support enforcement and transport systems (E.115).
- The plan does not address digital or energy resilience for future proof development and undermines the net zero vision and economic growth goals (E.119).
- Not compliant with NPPF para 16d with policy not being clear. Requests definition of terms “large-scale”, ‘strategic’, ‘major’ or ‘minor’ development. Policy needs amendment to define the circumstances under which the policy will be applied or definitions included within the appendices to the Plan (E.143, E.166, E.167 and E.168).

Response:

Note. No change required.

12. Minerals Supply

T31: Safeguarding of Existing Mineral Supply Infrastructure

4 representations have been received from the following consultees:

ID	Name	Stakeholder
E.136	Hutchison Ports	Developers Agents
E.164	Network Rail	Statutory Bodies
E.171	Redrow Homes Limited	Developers or Agents
E.204	Kent County Council	Statutory Bodies

Support

Representations support this policy.

Issues

- Suggest policy be amended to include the phrase ‘direct loss’ to clarify that the degree of prejudice is included (204).

Response:

This change could be made, if necessary.

T32: Supply of Recycled and Secondary Aggregates

1 representation has been received from the following consultees:

ID	Name	Stakeholder
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E.204	Kent County Council	Statutory Bodies
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Support

Representation support this policy and supports manufacturing of recycled and secondary aggregates, to provide alternative supply other than the primary land won supply being 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 scope.

Issues:

No issues logged.

Response:

No issues logged requiring a response.

T33: Extraction of Land Won Minerals

2 representations have been received from the following consultees:

ID	Name	Stakeholder
E.148	Natural England	Statutory Bodies
E. 204	Kent County Council	Statutory Bodies

Support

Representations 204 is in support of this policy.

- Greater clarity should be provided on safeguarded industrial mineral to further assist in the interpretation of how land won economic minerals are addressed by the Plan.
- Policy T33 should make note on the need to accord with other Local Plan policies, just as noted in policies T36 and T39 (204).

Issues:

- Object on grounds of concern that wording within the policy could lead to significant environmental impacts. Recommend strengthening the policy wording to 'Any development for the extraction of land won minerals will need to demonstrate that ecological and landscape impacts can be avoided or fully mitigated' (148).

Response:

Noted. Changes could be made to the policy to include consideration of ecological and landscape impacts.

13. Waste Management

DM23: Waste Prevention

10 representations have been received from the following consultees:

ID	Name	Stakeholder
1564	Mrs Elizabeth Poynter [1564]	Members of the public
1601	Mrs Gillian Mulloy [1601]	Members of the public
E.43	South East Waste Planning Advisory Group (SEWPAG)	Statutory bodies
E.94	Henry Langley	Members of the public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies
E.161	Peel Waters	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.204	Kent County Council	Statutory bodies

Support

The principles of minimising waste, applying the Waste Hierarchy, and providing suitable facilities and capacity are supported, as is the Circular Economy Statement in paragraph 12.3.3 as a tool for policy compliance.

Integration of waste within the local plan and net self-sufficiency are also supported (43).

Issues:

- Objects to 12.1.39: Calls for better education to boost recycling and make it more economical (1564).
- Disagrees with RDF claim: Medway's waste schemes are effective; minimal material should require burning (1564).
- Critiques waste policy: Too generic; lacks measurable targets, spatial strategy, operational standards, evidence, and development management criteria (1564).
- Notes gaps: No construction waste management; risks under CIL Regulation 122 (1564).

Response:

No change required.

T34: Safeguarding of Existing Waste Management Facilities

5 representations have been received from the following consultees:

ID	Name	Stakeholder
E.43	South East Waste Planning Advisory Group (SEWPAG)	Statutory bodies
E. 83	Terance Butler Holdings	Developers or Agents

E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.161	Peel Waters	Developers or Agents
E. 204	Kent County Council	Statutory bodies

Support

A number of comments were received which generally supported this policy.

Issues:

- Recommends the Policy T34 be re-written, ensuring the non-repeat of sub-item letters and to be comprehensible (104).
- Suggests renaming the Policy T34 to “Safeguarding of all Lawfully Permitted Waste Management Facilities.” (204). 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.

Response:

No change required.

T35: Provision of Additional Waste Management Capacity

4 representations have been received from the following consultees:

ID	Name	Stakeholder
E.43	South East Waste Planning Advisory Group (SEWPAG)	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies
E.204	Kent County Council	Statutory Bodies

Support

A number of comments were received which generally supported this policy with recognition of the criteria-based policy setting core expectation to support waste vision.

Issues:

- Object to policy T34 and strongly recommends that 'Any development for the extraction of land won minerals will need to demonstrate that ecological and landscape impacts can be avoided or fully mitigated (148).
- Recommendations to make policy T35 targets specified in the Plan more easily identifiable (43).

Response:

No change required.

T36: Location of Waste Management Facilities

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.43	South East Waste Planning Advisory Group (SEWPAG)	South East Waste Planning Advisory Group (SEWPAG)
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

A number of comments were received. Supportive criteria-based policy that addresses all the usual potentially suitable locations for the various types of waste management development.

Issues:

- Policy T36 ss4d) add wording “in exceptional circumstance with robust evidence” in section ss4d.

Response:

No change required.

T37: Other Recovery

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.43	South East Waste Planning Advisory Group (SEWPAG)	South East Waste Planning Advisory Group (SEWPAG)
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

Representations support this policy.

Issues:

- Suggests amendment in relation to carbon emissions (43)
- 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 (204).

Response:

No change required.

T38: Non-Inert Landfill

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.43	South East Waste Planning Advisory Group (SEWPAG)	South East Waste Planning Advisory Group (SEWPAG)
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

Representation E.43 is in general support of not allocating land despite additional landfill capacity being needed and is also in support of use of inert waste by permanent deposit as this is fully consistent with regional work.

Issues:

- Recommends amends to ss c) as follows;
- Paragraph 1: Add new (j): landfill base must be lined with engineered non-porous geotextile before landfilling.
 - Add new (ii): final capping with non-porous geotextile liner overlaid with clay.
 - Renumber current (i) and (ii) as (iii) and (iv).
- Paragraph 2: Relabel subsections as (d) and (e) for clarity (104).

Policies T37, T38, T40:

- Should state requirement to accord with other Local Plan policies, as seen in T36 and T39 (204).

Response:

No change required. The Council is a member of SEWPAG.

T39: Beneficial Use of Inert Waste by Permanent Deposit

1 representation has been received from the following consultees:

ID	Name	Stakeholder
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils

Support

Representation supports this policy along with ss a) and d).

Issues:

No issues logged.

Response:

No issues logged requiring a response.

T40: Wastewater Treatment

2 representations have been received from the following consultees:

ID	Name	Stakeholder
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E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

Representations support this policy

Issues:

- It is suggested that Policy T40 be strengthened to address current under-capacity and future demand (104).
- Suggests that policies T37, T38 and T40 should accord with other Local Plan policies, noting 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.

Response:

No change required.

14. Energy

S25: Energy Supply

7 representations have been received from the following consultees:

ID	Name	Stakeholder
865	Mr Graham Hunt	Members of the public
1155	CPRE Kent	Voluntary and Community Organisations
1609	Mrs Samantha Clarke	Members of the public
567	Mrs Jill Peet	Members of the public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.124	National Grid	Statutory bodies
E.136	Hutchinson Ports	Developers or Agents

Support

Comments support the policy and recognition of Grain's strategic role, including the need for carbon capture and storage technology. Support is expressed for the blue/green hydrogen and expanded electricity storage for low-generation periods and that the Isle of Grain and Kingsnorth should prioritize wind and solar over hydrocarbons, with hydrocarbons last in hierarchy.

Issues:

- Object as there is no mention of solar energy supply or criteria for planning applications. The policy should be amended to make reference to solar panels and the need avoid siting them on green belt and BMV (865).
- Object as the policy supports the transition to net zero carbon by 2050 despite a large amount of additional cars on the road resulting from huge development of houses (1609).

Response:

Noted. No change required.

T41: Heat Networks

3 representations have been received from the following consultees:

ID	Name	Stakeholder
E.82	St John's College	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.184	Hoo Consortium	Developers or Agents

Support

Issues:

- Policy T41 'Heat Network' should be modified as follows, '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' (82)
- Recommends removal of T41 and entire Section 13.3 as 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 (104)
- Policy appears premature and further work must be undertaken (184)

Response:

Noted. No change required.

15. Site allocations

SA1: Chatham Town Centre and Surrounds

15 representations have been received from the following consultees:

ID	Name	Stakeholder
4532, 4533	Ms Georgina Kosanovic	Members of the Public
4730	Miss Jackie Forrest	Members of the public
4838	Mrs Emma Aldous	Members of the Public
E.62	Telereal Securitised Property GP Limited	Developers or Agents
E.68	Environment Agency	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.148	Natural England	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents

Support

A number of comments were received which generally supported this policy. Supporting comments related to the re-use of underused land and brownfield sites, support for regeneration of Chatham Town Centre due to fear of crime, suggestions of design principles, support but need for consideration of utilities supply, support for developments to contribute to provision of green and blue infrastructure, support for development of sites near station and station entrance upgrade.

Issues:

- Concern over need for expansion of health facilities (4838).
- Consideration of architecture in development (4838).
- Concern over risk of flooding and development to fund defences (E.68).
- Concern over lack of detail in masterplans (E.104).
- Concern over impact of development on railway station/line (E.104).
- Concern over delivery of sites linked to viability especially in first 5 years (E.117, E.157, E.166).

Response:

A relatively small number of comments were received in relation to this allocation policy. They covered a number of concerns relating to delivery, viability, masterplanning and infrastructure delivery.

SA2: Heritage-led Sites

22 representations have been received from the following consultees:

ID	Name	Stakeholder
4534	Ms Georgina Kosanovic	Members of the Public
4732	Miss Jackie Forrest	Members of the public
E.45	Chatham Historic Dockyard Trust	Voluntary and Community Organisations
E.52	University of Kent	Other
E.68	Environment Agency	Statutory Bodies
E.79	Historic England	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.158	Option Two Development Limited	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents

Support

Supporting comments to this policy related to general observations of sites needs such as utilities provision, support for residential use, support for inclusion of other sites as well as design considerations in historic locations.

Issues:

- Objections to specific site allocations designations – residential over mixed use (E.45, E.52).
- Preservation of historic setting – heritage led required (E.45).
- Flood risk – development in floodplain (E.68).
- Impact of residential development in conservation areas and negative impact (E.104).
- Concern over 5 year supply, lack of buffer (E.117).
- Concern over delivery of sites linked to viability especially in first 5 years (E.166).

Response:

A small number of objections were raised to this policy across a number of themes. Most related to specific sites within the historic/heritage context. Issues of the 5 year housing supply and buffer are addressed in topic papers.

SA3: Gillingham District Centre

4 representations have been received from the following consultees:

ID	Name	Stakeholder
4731	Miss Jackie Forrest	Members of the public
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents

Support

There was general support for this policy as well as support with site specific considerations.

Issues:

- Concerns over site capacity, building heights and living standards (E.104).
- Concern over delivery of sites linked to viability especially in first 5 years (E.166).

Response:

This allocations policy received a very small number of comments. The main objections related to site specific issues and delivery/phasing. No change required.

SA4: River Waterfront

28 representations have been received from the following consultees:

ID	Name	Stakeholder
4411	Mrs Clare Marshall	Members of the Public
4537	Blueberry Homes	Developers or Agents
4733	Miss Jackie Forrest	Members of the public
4839	Mrs Emma Aldous	Members of the Public
4875	Mrs Elizabeth Poynter	Members of the Public
4973	Mr H Fitzpatrick	Members of the Public
5023	National Bargee Travellers Association (Ms Pamela Smith, Chair)	Voluntary and Community Organisations
5026	Mr Lincoln Ritchie	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.79	Historic England	Statutory Bodies
E.80	Home Builders Federation (HBF)	Developers or Agents
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.110	NHS Kent and Medway	Statutory Bodies
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.143	Taylor Wimpey & Persimmon Homes	Developers or Agents
E.146	Paul Barden	Members of the Public

E.148	Natural England	Statutory Bodies
E.155	Mr Zammit and Mr Jhalli	Developers or Agents
E.156	HRF Properties Limited	Developers or Agents
E.161	Peel Waters	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.170	Richborough	Developers or Agents

Support

A number of comments were received which generally supported this policy. Supporting comments related to observations about environmental considerations, concern over funding, support for a bridge over the River Medway, community allotments, transport model shift target, historic environment considerations, site specific utilities services, need for health facilities growth, public realm and infrastructure considerations.

Issues:

Phasing & Delivery

- Querying phasing of sites in first five years (E.117, E.143, E.166).
- Querying ability to deliver two large PDL sites in first five years (E.80).
- Concern over delivery of sites against significant infrastructure requirements (E.166).

Previously Developed Land (PDL)

- Concern about over-reliance on PDL and lack of supporting evidence (E.155, E.156).

Site Capacity & Layout

- Querying site capacities/phasing (4537, E.104).
- Querying housing numbers and layout at Chatham Waters (E.104).
- Building heights and industrial heritage considerations at waterfront sites (E.104).

Flood Risk & Infrastructure

- Concern over flood risk and funding for flood defence in IDP for waterfront sites (E.68).
- Objection to flood-vulnerable sites – flood defence needs addressing before development (E.68).

Policy & Masterplanning

- Greater clarity within policy (4537).
- Request for masterplan to coordinate sites under policy SA4 (E.104).

Access & Connectivity

- Querying how Gillingham Dockyard railway line can be opened up – request for consultation (4973).
- Land ownership considerations for riverside public access/walk (4537).
- Concern about factoring health and opening riverside walk (4839).

Site-Specific Issues

- Specific site boundary accuracy (4537).
- Against relocation of mooring to enable development (5023).

Chatham Docks & Flexibility

- Objection to loss of Chatham Docks and lack of infrastructure in replacement (E.115, E.146).
- Request for flexibility in use changes (E.115).

Environmental & Designations

- Consideration of adverse impacts on national environmental designations, incl. Medway Estuary Marine Conservation Zone (E.148).

Housing Mix

- Querying delivery of homes suitable for students and older residents (E.170).

Response:

A wide range of objections were raised to this allocations policy. A number related to phasing and site capacities. Others comments were site specific across a range of issues from potential impact from development and suggested considerations required.

The loss of Chatham Docks has been considered and supported by the Council.

SA5: Strood Town Centre and Surrounds

19 representations have been received from the following consultees:

ID	Name	Stakeholder
4840	Mrs Emma Aldous	Members of the Public
E.26	NHS Property Services (NHSPS)	Statutory Bodies
E.32	Michael Mc Evoy	Members of the Public
E.53	Kelvin Carr	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.79	Historic England	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.110	NHS Kent and Medway	Statutory Bodies
E.132	Allhallows Parish Council	MPs, Members and Parish Councils
E.157	Hallam Land (Acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land	Developers or Agents

Support

A number of general supporting representations were received in terms of support for the policy in principle and the objectives from an environmental or transport perspective. Others have general suggestions on policy refinements along with the general support.

Issues:

Design & Development Requirements

- Suggests changes: more sympathetic historical architecture, infrastructure for residential expansion, and increased healthcare facilities to support development (4840).

Infrastructure & Transport Concerns

- Impact on infrastructure overall (E.53).
- Transport impact concerns (E.53).
- Congestion at Four Elms roundabout; lack of detail on Bus Rapid Transit Corridor and junction upgrades (E.132).

Flood Risk & Policy Soundness

- Policy unsound as some sites lie in flood plain; flood defences must be in place before development (sites SNF 15, 34, 35, 38, 41).
- Policy amendments suggested due to SFRA issues (E.68).

District Centre & Local Impact

- Ignoring additional pressure on Strood district centre (E.32).

Deliverability

- Concern over short-term deliverability of some sites (first 5 years) (E.166).

Response:

A number of issues were raised with this policy in relation to impact of development on environmental grounds, as well as infrastructure. The Infrastructure Delivery Plan and Strategic Transport Assessment provide the evidence to support the approach.

SA6: Land West of Strood

91 representations have been received from the following consultees:

ID	Name	Stakeholder
4330	Mrs Jennifer Price	Members of the Public
4385	Mr Stephen Hubbard	MPs, Members and Parish Councils
4438	Sports England (Mr Bob Sharples)	Statutory Bodies
4510	Mr Jason Tillman	Members of the Public
4564, 4569	Mrs Helen Lucas	Members of the Public
4590	Mrs Ann Buttle	Members of the Public
4617	CPRE Kent	Voluntary and Community Organisations
4654, 4655, 4658, 4660, 4667, 4670	Mr Kevin Smith	Members of the Public
4683, 4684	Mr John Kay	Members of the Public
4734, 4653	Miss Jackie Forrest	Members of the Public
4779, 4780	Kent Downs AONB Unit	Statutory Bodies

4809, 4810, 4813, 4815, 4817, 4819, 4821	Mrs Alison Stiling	Members of the Public
4814, 4816, 4818, 4820, 4822	Mrs Hazel Wiggins	Members of the Public
4841	Mrs Emma Aldous	Members of the Public
4844	Miss Francesca Fox	Members of the Public
4881	Mrs Elizabeth Poynter	Members of the Public
4892	Nightingale Homes Ltd	Developers or Agents
4921	Mrs Sarah Harrington	Members of the Public
4932, 4933	Barratt David Wilson Homes	Developers or Agents
E.10	Susan Bell	Members of the Public
E.11	Angela Connelly	Members of the Public
E.15	Julian Grayland	Members of the Public
E.19	Claire Glover	Members of the Public
E.20	Yvonne Tatnall	Members of the Public
E.22	Sam Hatton	Members of the Public
E.27	Joann Skinner	Members of the Public
E.32	Michael McEvoy	Members of the Public
E.53	Kelvin Carr	Members of the Public
E.55	Maggie Antoniou	Members of the Public
E.58	Stephen Dyke	Members of the Public
E.66	Cliff Webb	Members of the Public
E.67	Kent Wildlife Trust	Voluntary and Community Organisations
E.81	Southern Water	Statutory Bodies
E.85	National Highways	Statutory Bodies
E.99	Marilyn Hawkes	Members of the Public
E.102	Jessica Glover	Members of the Public
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.110	NHS Kent and Medway	Statutory Bodies
E.113	Dickens' Country Protection Society	Voluntary and Community Organisations
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.144	E Butcher	Members of the Public
E.148	Natural England	Statutory Bodies
E.151	J P Eastlake	Members of the Public
E.164	Network Rail	Statutory Bodies
E.165	Bellway Strategic Land (Brompton Farm)	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.186	Brookworth Homes	Developers or Agents
E.188	John Connelly	Members of the Public
E.191	Gravesham Borough Council	Statutory Bodies

E.192	Frindsbury Extra Parish Council	MPs, Members and Parish Councils
E.193	Laura Blair	Members of the Public
E.199	Richard Bellingham	Members of the Public
E.202	Friends of Broomhill	Voluntary and Community Organisations

Support

A number of comments were received which generally supported this policy. Supporting comments related to a number of issues including general support for the development in principle, the provision of sports pitches, acknowledgement of need for proposal to be landscape led, joint working opportunities on transport/modal shift and support for DtC and cross boundary issues,

Issues:

Green Belt & Land Use

- Objection to development on Green Belt: (E10, E19, E20, E22, E32, E53, E66, E99, E113, E144, E151, E192, E193, E199)
- Querying Green Belt review and evidence base: (1473, 4683, 4385, 4844, 4892, 4921, 4932, 4933, E22, E32, E53, E67, E165, E193)
- Concerns over Green Belt release, infrastructure, transport, village character: (4569, 4590, 4617, 4658, 4684, 4734, 4809–4816, 4822, E11, E15, E20, E22, E32, E53, E55, E66, E102, E151, E188, E192, E193)
- Green Belt to Grey Belt categorisation, lack of consultation/DtC: (4564, 4653, 4654, 4667, 4683, 4684, 4819, 4820, 4841, 4844, 4921, E11, E15, E53, E144, E151, E165, E192, E193)
- Loss of best value agricultural land: (4617, 4683, 4817, 4818, E10, E15, E53, E55, E113, E151, E193, E199, E202)

Environmental & Ecological

- Ecological impact (including Rede Common): (4510, 4844, E15, E19, E22, E27, E53, E55, E67, E99, E102, E144, E148)
- Air pollution concerns: (4821, E20, E28, E32, E53, E99, E144)
- Loss of open space: (E53)

Infrastructure & Transport

- Infrastructure quantity and delivery (first five years): (E177, E186)
- Issues with maps/concept plan clarity: (4660, 4932)
- Access and transport concerns (including Strood impact): (4385, 4655, E11, E27)
- Rede Court housing issues (unsafe access, parking): (E188)

Policy & Process

- Lack of clarity in policy ('landscape led', 'Golden rules', affordable housing, densities): (4617, 4932, 4933, E22, E148, E202)
- Remove heritage buffer from concept plan: (E177)
- Footpath protection: (E20)

Community & Social

- Impact on village character: (see Green Belt release above)

- Increase in crime: (E66)

Response:

A wide range of issues were raised by stakeholders in relation to this allocation. A number flatly objected to the development being on greenbelt land. Others provided various reasons for their objections including concerns over evidence to support the justification for the allocation, the lack of sufficient infrastructure in the surrounding area, the impact on local character, the loss of agricultural land, the impact on air quality, the lack of clarity in the policy as well as issues with understanding the details in the maps and concept plan.

Additionally, a Green Belt Exceptional Circumstances Topic Paper sets out the justification for exceptional circumstances and sets out the changes to the Green Belt boundary. A masterplan will be prepared collaboratively across all developers and Local Authorities (Medway Council and Gravesham Borough Council) for approval in advance of any planning applications.

The Council supports some modifications to strengthen policy wording.

SA7: Capstone Valley

46 representations have been received from the following consultees:

ID	Name	Stakeholder
4430, 4443 - 4445	Mr Ray Dines	Members of the Public
4439	Sports England (Mr Bob Sharples)	Statutory Body
4365 - 4367	Mr Graham Hunt [865]	Members of the Public
4412	Mrs Clare Marshall [1525]	Members of the Public
4481	Mrs Carol Thorndycraft [667]	Members of the Public
4604	Ms Bridget Fox (Woodland Trust) [159]	Voluntary and Community Organisations
4618	CPRE Kent [1155]	Voluntary and Community Organisations
4843	Mrs Emma Aldous [1632]	Members of the Public
4877	Mrs Alison Heine [1482]	Developers or Agents
E.14	Lyn Wiles	Members of the Public
E.16	Jill Lovell	Members of the Public
E.31	Paula Quirk	Members of the Public
E.40	Theresa Elsey	Members of the Public
E.67	Kent Wildlife Trust	Voluntary and Community Organisations
E.81	Southern Water	Statutory Bodies
E.85	National Highways	Statutory Bodies
E.94	Henry Langley	Members of the Public
E.95 (4781, 4782)	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.110	NHS Kent and Medway	Statutory Bodies

E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
H.6	Rehman Chishti	Members of the Public
E.126	Boxley Parish Council	MPs, Members and Parish Councils
E.129	Bredhurst Parish Council	MPs, Members and Parish Councils
E.148	Natural England	Statutory Bodies
E.153	Maidstone Borough Council	Statutory Bodies
E.162	Kitewood Estates Limited	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.170	Richborough	Developers or Agents
E.175	RM Gollay	Members of the Public
E.187	Cllr Alex Hyne & Cllr Robbie Lammas	MPs, Members and Parish Councils

Support

A number of comments were received which generally supported this policy. Comments raised related to The capstone valley landscape character, support but observation that Darland Banks is a vital green lung, support subject to transport impact factored in, importance of woodland buffer strips within the designation, support highlighting need for reference to Medway's Playing Pitch Strategy, importance of green corridors, noting M2 J4 upgrades, health provision considerations, need for policy references to Lidsing Garden Community, Site development capacities.

Issues:

Objections to Development

- Against development of area: (4843, E.94, H6, E.126, E.175, E.187)
- Against development in Green Belt: (E.14)
- Objection to development on Rainham Orchards: (E.40)

Environmental & Land Use Concerns

- Loss of agricultural land and ecological impact: (4412, 4444, 4481, 4618, E.31, E.115, H.6, E.126, E.129, E.148, E.175, E.187)
- Loss of open space: (E.115, E.126, E.187)
- Air quality impact: (E.31, E.126)
- Flood risk: (E.126, E.129)
- Need for landscape-led policy: (4781)

Infrastructure & Transport

- Impact on road network: (4445, E.31, E.40, E.104, E.126, E.129, E.170)
- Impact on existing infrastructure: (E.40, E.104, E.126)
- Timing of infrastructure delivery: (4481, E.104, H.6)
- Lack of detail on orbital bus service: (4445)
- Lack of detail on design, costing, and highway impact: (4430, E.148)

Housing & Delivery

- Timing of housing delivery, especially first five years with BNG requirements: (E.117, E.166, E.170)
- Timing of education facilities delivery: (4443, E.104)

Policy & Funding

- Lack of funding: (E.115)
- Need for greater transparency in policy: (4618)
- Need to consider Gypsy and Traveller sites: (4877)

Response:

A wide range of objections were raised to this allocations policy around impact of the development across a number of themes with many being against the development of Capstone and many raising concern over environmental impacts and infrastructure.

The Council supports some modifications to strengthen policy wording. The Council has produced an updated Infrastructure Delivery Plan.

SA8: Hoo St Werburgh and Chattenden

112 representations have been received from the following consultees:

ID	Name	Stakeholder
4440	Sports England (Mr Bob Sharples)	Statutory Bodies
4447	Mrs Hazel Sellwood	Members of the Public
4459	Mr Colin Dutton	Members of the Public
4576	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4603	Bloomfields Ltd (Mr Ben Young, Associate)	Developers or Agents
4607	Ms Bridget Fox (Woodland Trust)	Voluntary and Community Organisations
4619	CPRE Kent	Voluntary and Community Organisations
4735, 4736, 4737, 4738, 4739, 4740, 4741, 4749	Miss Jackie Forrest	Members of the public
4790	Mrs Karen Shaw	Members of the Public
4845	Mrs Emma Aldous	Members of the Public
4878	Mrs Alison Heine	Developers or Agents
4893, 4897, 4901, 4904, 4907	Kitesfield Estates Limited	Developers or Agents
4972	Mr Richard Carpenter	Members of the Public
E.28	Jacqueline Mark	Members of the Public
E.41	Cllr Ron Sands	MPs, Members and Parish Councils
E.44	Hoo St Werburgh & Chattenden Parish Council	MPs, Members and Parish Councils

E.47	Esquire Developments (Flanders Farm)	Developers or Agents
E.57	National Grid Electricity Transmission (NGET)	Statutory Bodies
E.67	Kent Wildlife Trust	Voluntary and Community Organisations
E.68	Environment Agency	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.85	National Highways	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.108	Ron Sands and Dawn Waller	Members of the Public
E.110	NHS Kent and Medway	Statutory Bodies
E.113	Dickens' Country Protection Society	Voluntary and Community Organisations
E.115	Medway Conservative Group	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.119	The Alliance of Hoo Peninsula Parishes	Voluntary and Community Organisations
E.120	St James, Isle of Grain, Parish Council	MPs, Members and Parish Councils
E.121	Goodman	Developers or Agents
E.127	Friends of Deangate Ridge Country Park Committee	Voluntary and Community Organisations
E.132	Allhallows Parish Council	MPs, Members and Parish Councils
E.137	Dean Lewis Estates (Hoo, Chattenden & High Halstow)	Developers or Agents
E.146	Paul Barden	Members of the Public
E.148	Natural England	Statutory Bodies
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.170	Richborough	Developers or Agents
E.174	Peter and Val Richardson	Members of the Public
E.176	Homes England (Chattenden Barracks)	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.182	Taylor Wimpey	Developers or Agents
E.184	Hoo Consortium	Developers or Agents
E.200	Save The Hoo Peninsula Campaign (STHP)	Voluntary and Community Organisations
E.201	Rt Hon Kelly Tolhurst	Members of the public
H.32	D A Laphorn	Members of the Public
H.36	M T Dennison	Members of the Public
H.38	Marilyn Stone	Members of the Public
H.48	David & Nina Weatherley	Members of the Public
H.60	High Halstow Parish Council	MPs, Members and Parish Councils

Support

General support was shown for this policy along with some minor suggestions/amends as well as the following provisions: Acceptability of allocations in flood zone 1, subject to utilities provision (E.81), subject to developers M2/J1 Upgrade, support for inclusion of specific allocations.

Issues:

Scale & Character of Development

- Against scale of development (4739, 4749, 4790, E.28, E.108, E.119, H.60, H.38, H.48, E.127, E.174, E.200, E.201, H.36)
- Loss of village/rural character (4459, 4845, E.44, E.108, E.201)
- Need to keep separate villages (4740)
- Concern over building on greenfield/agricultural land (4459, E.28, E.44, E.120)

Environment & Ecology

- Ecological impact (4510, 4619, E.28, E.108, E.120, E.127, H.36, H.48, E.170, E.200)
- Impact on air quality/health (4790, E.119, E.127, H.32, H.36, H.48)
- Policy amendments for environmental perspective: masterplanning, green infrastructure, Strategic Environmental Management Plan, mitigation for SPAs/Ramsar/SSSIs (E.148)
- Greater clarity & evidence from environmental perspective (E.148)
- Investigate alternatives to avoid environmental harm (E.200)
- Clarity over SEMS remit/programme & evidence (E.176)
- Need green infrastructure & woodland buffer for SSSIs/ancient woodland (4607)
- Impact of coastal change not factored for HHH32; need Coastal Vulnerability Assessment (E.68)

Infrastructure & Delivery

- Insufficient infrastructure: roads, schools, healthcare, water (4447, 4459, 4619, 4736, 4739, 4790, E.28, E.41, E.44, E.115, E.119, E.127, H.32, H.36, H.48)
- Lack of transport/public transport/walking/cycling options (E.28, E.44, E.115, E.119, H.32, H.36, E.146, E.170)
- Concern over transport access for mobility issues (4737)
- Need bridge/tunnel to Strand from Kingsnorth (4738)
- Concern over withdrawal of new station plan at Sharnel Street (H.48)
- Need timely highway interventions & Medway-wide Monitor & Mitigation Strategy (E.137)
- Clarity on LTC upgrades at M2 J1 (E.184)
- Use of Draft Area-Wide Travel Plan & Sustainable Transport Strategy (E.184)
- Prioritise sustainable transport measures if trainline/station evidence lacking (E.177)

Policy & Evidence

- Lack of connection to neighbourhood plan (E.44, E.119, E.200)
- Objectives inconsistent with Local Plan (E.44)
- Greater clarity in policy & linked evidence (4901, 4904, E.41)
- Infrastructure delivery coordination; link to policy S24 (E.157)
- Limitation to energy infrastructure not factored (E.57)
- Lack of reference to digital/energy resilience & net zero (E.119)
- Clarity on Hoo-specific IDP references (E.184)
- Policy amendments for environmental considerations & compatibility with other SPDs (E.177)

- Suggested policy wording for design/layout of new settlement (E.137)
- Policy amendment for convenience retail thresholds/net sales area (E.137)
- 30% affordable housing inappropriate (E.146)
- Include Future Homes Standard 2025 (H.38)

Delivery & Viability

- Querying delivery of sites within timescale, esp. first 5 years (E.117, E.166)
- Amendments to site capacities (E.177)
- All sites benefiting from strategic infrastructure contribute to IDP (E.177)
- 'Cost apportionment' required considering viability (E.184)
- Heat Network feasibility/viability requirement should not fall on developers without evidence (E.184)

Specific Sites & Design

- Concern over sites HHH2, HHH6, HHH8, HHH24, HHH31, HHH33; need evidence (E.113)
- Object to Figure 14 Concept Plan; strategic green corridor through HHH8 unjustified (E.182)
- Amendments to design principles (Criteria 5 & 11) & separation approach (E.184)
- Criteria 18: strategic masterplan framework not required for historic landscapes (E.184)
- Bus Rapid Transit criteria should specify service type (E.184)

Community & Social

- Need for sports/social/community facility (4972)
- Need significant retail provision to reduce travel (E.132)
- Include Gypsy/Traveller site allocation (4878)
- Protection of employment infrastructure around Stoke Road/Ropers Lane (E.121)
- Support safeguarding railway land but need clear strategy & funding (E.164)

Response:

A wide range of objections were raised to this allocations policy across a broad range of themed links to this specific allocation. The most raised issues were the proposed scale of growth, the potential impact on the environment, the scale of new infrastructure and impact on existing infrastructure, use of greenfield sites and agricultural land, then potential loss/change of character of village(s).

The Council supports some modifications to strengthen policy wording. The Council has produced an updated Infrastructure Delivery Plan and is progressing work on transport improvements for the Hoo Peninsula.

SA9: High Halstow

16 representations have been received from the following consultees:

ID	Name	Stakeholder
4448	Mrs Hazel Sellwood	Members of the Public
4580	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4742, 4744	Miss Jackie Forrest	Members of the public

4791	Mrs Karen Shaw	Members of the Public
4846	Mrs Emma Aldous	Members of the Public
4392	Mrs Sharon Sewell	Members of the Public
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
H.5	Linda Atkinson	Members of the Public
H.47	Brian & Iris Rickford	Members of the Public
H.55	Stefan Davis	Members of the Public
E.148	Natural England	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

Some representations support the policy.

Issues:

Strategic and Site-Specific Concerns

- Many comments referenced strategic allocations, with issues captured under thematic themes: environmental impacts, infrastructure pressures (including transport), and opposition to the spatial strategy. Common requests included reducing allocation scale or removing sites entirely (general).
- Significant concerns regarding deliverability of proposed housing allocations, especially in the short term; additional sites may be needed to meet housing requirements within the first five years (E.166).

High Halstow and Policy SA9

- Concern over village development and loss of village atmosphere (4448).
- Objections to large-scale development in High Halstow, citing infrastructure strain (wastewater, transport, roads, health facilities) and loss of village character (4392).
- Key allocations like High Halstow seen as isolated, costly, and undeliverable, undermining NPPF compliance (H.5).
- Recommend modifications to Policy SA9 for clarity and soundness:
 - Remove references to withdrawn Neighbourhood Plan and unpublished housing needs survey (E.171, E.184).
 - Update wording to reflect proposed development details: approx. 820 homes, land for a new primary school, green infrastructure, and local centre (E.171).
 - Combine “masterplan” references with design principles; flexibility needed for landscape/separation strategies (E.171, E.184).
 - Amend criteria on village centre viability, service references, and developer contributions to ensure proportionality and CIL compliance (E.184).
 - Suggested wording change: “bus rapid-transit services (or similar)” (E.184).
 - Criteria 2 and Subsequent Design Principles: combined masterplan intent supported but does not require a single masterplan (E.184).
 - Criteria 3: Village Centre viability cannot be guaranteed; should not be a requirement (E.184).
 - Criteria 4: Landscape/separation prescriptive wording should allow flexibility; coalescence risk is non-existent (E.184).

- Criteria 11 and 12: Amend to refer to service type, and clarify proportional contributions to junction works (E.184).

Environmental and Infrastructure Issues

- Recommend additional policy wording for Site HHH26 to ensure mitigation of impacts on Northward Hill SSSI and RSPB reserve (4560).
- Amendment suggested due to proximity of allocations within Policy SA9 to Northward Hill SSSI (E.148).
- Concern about Redrow development on Grade 1 farmland between Britannia Road and Christmas Lane harming wildlife (H.47).
- Concern over withdrawal of plans for a new train station at Sharnel Street (H.55).

General Objections

- Too many homes proposed (4742).
- Not enough capacity to develop area (4744).
- Excessive scale and inadequate infrastructure could harm quality of life and safety (4791).
- Object to developing a small community-focused village with such a large number of houses (4392).

Response:

There have been general objections to the scale of growth proposed and concerns about the loss of the village character. There were also concerns about the impact on infrastructure and the environment.

The Council supports some modifications to strengthen policy wording. The Council has produced an updated Infrastructure Delivery Plan and is progressing work on transport improvements for the Hoo Peninsula.

SA10: Lower Rainham

35 representations have been received from the following consultees

ID	Name	Stakeholder
4329	Mr David Hillery	Members of the Public
4364	Mr Graham Hunt	Members of the Public
4413 - 4415	Mrs Clare Marshall	Members of the Public
4451	Trenport Investments Ltd (Sean Molyneux) [1496]	Developers or Agents
4455 - 4458	Mrs Patricia King	Members of the Public
4483 - 4489	Mr Mark Hewer	Members of the Public
4577	RSPB England (Mr Joseph Beale)	Voluntary and Community Organisations
4596	CPRE Kent [1155]	Voluntary and Community Organisations
4597, 4608, 4908	AC Goatham & Son	Developers or Agents
4633, 4645 - 4646	Mr Russell Smith	Members of the Public

4675 -4676	Mrs Ruth Dyke	Members of the Public
4693	Mr Ray Holton	Members of the public
4748	Miss Jackie Forrest	Members of the public
4784	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
4801	Mr Ian Thompson	Members of the Public
4879	Mrs Alison Heine	Developers or Agents
4891	Nightingale Homes Ltd	Developers or Agents
4894, 4902	Mrs Elizabeth Poynter	Members of the Public

Support

A few respondents supported this policy.

Issues:

Traffic & Congestion

- Severe congestion on A2 and Lower Rainham Road; Pump Lane junction bottleneck worsened by proposed development (4413, 4483, 4645, 4646, 4676, 4489).
- No traffic analysis for Beechings Way/Pump Lane junction (4483).
- Roads cannot cope with current flow; more houses will exacerbate issues (4646, 4693).
- Concern over obstruction to Riverside Country Park enjoyment due to traffic (4676).

Environmental & Biodiversity

- Northern field (former pear orchard) supports rare pollinators and plants (4413).
- Concern over tree removal, air quality, noise, runoff, and climate change (4675).
- Objection if parcelling avoids biodiversity net gain obligations; Rainham's rural character valued (4414).
- Orchards described as "last green lungs" (E.18).

Loss of Agricultural Land

- Object to building on orchards and prime farmland; unjustified loss of BMV land inconsistent with NPPF (4633, 4455, 4596, E.104, E.111, E.198).
- RN9 is Grade 1 agricultural land; harm to countryside and heritage (E.104, E.111).
- Development threatens rural landscape and buffer between urban/rural areas (E.198).

Infrastructure Deficiencies

- Roads, transport, healthcare remain inadequate; Medway Hospital needs expansion (4455).
- Concerns over sewage, water treatment, health and education provision (E.39, E.115).
- Reliance on vague S106 plans criticised (E.115).
- Wastewater removal flagged (4364).

Scale & Deliverability

- 750 homes plus large schools will strain transport and landscape; rural design code absent (4485, 4486, 4487).
- Development expected to take 10 years despite claims (4485, 4487).
- Fragmented housing by multiple developers will cause disruption (4457).

- Concerns over deliverability and 5-year housing supply (E.117, E.166).

Policy & Planning Issues

- Reasons for previous refusal remain; remove SA10 from Local Plan (4484).
- Plans unchanged since 2021 rejection (4458).
- SA11 needs site-specific criteria; CHR14 sensitive (4784).
- RN9 allocation questioned; brownfield-first approach urged (E.111).
- Objection to SR14 due to harm to SSSI Nightingale population and failure of NPPF tests (4577).
- Revision needed to SA10 for land quality, density, transparency (4596).

Character & Setting

- Rainham Parkside Village would destroy rural setting; obstruction to views (4488, 4329).
- Orchards vital for local character (E.18).
- Concern over irreversible harm to valued landscape (E.198).

Additional Concerns

- Traveller site provision questioned given past evictions (4879).
- Making Pump Lane one-way disregards residents (4489).
- Need flexibility for strategic site use (4908).
- Railway safety measures required for RN9 (E.164).
- Local Plan should prioritise regeneration in urban areas over greenfield loss (E.203).

General Objections

- Sites cannot sustain development (4748).
- Not justified or effective; oppose restrictions west of Rainham Parkside Village (E.190).
- Oppose scale of development; recent housing growth already strains infrastructure (E.115).
- Protect green spaces; oppose 750-home proposal (H.6).
- Concerns over cumulative impacts on SPA/Ramsar sites and need for mitigation hierarchy compliance (E.148).

Response:

Concerns raised about the impact in the environment & biodiversity, transport & congestion, loss of agricultural land and destruction of character and setting. In relation to the site allocation concerns are raised regarding the scale and deliverability.

There has also been some objection to the site allocation citing the previous refusal.

A masterplan is required for this site allocation, which will seek to address these concerns.

SA11: Rural Settlements

18 representations have been received from the following consultees:

ID	Name	Stakeholder
4743, 4745-4747	Miss Jackie Forrest [1219]	Members of the public

4783	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager) [966]	Statutory Bodies
4606	Ms Bridget Fox (Woodland Trust) [159]	Voluntary and Community Organisations
4849	Mrs Emma Aldous [1632]	Members of the Public
4903	Mrs Gillian Mulloy [1601]	Members of the Public
E.64	Cuxton Parish Council	MPs, Members and Parish Councils
E.68	Environment Agency	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.82	St John's College	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.120	St James, Isle of Grain, Parish Council	MPs, Members and Parish Councils
E.138	Dean Lewis Estates (Cliffe Woods)	Developers or Agents
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

Some comments of support received. Some caveats raised including but not limited to concerns around the flood plain, limited services and minor amendments.

Issues:

Rural Character & Development Limits

- Rural areas must remain rural (4745).
- Villages cannot support further development (4747).
- Object to adoption of listed land (4849).

Policy Wording & Modifications

- Object to para 14.12.6 wording; alternative suggested (4783).
- SR4: support allocation; replace “up to” with “circa” for housing figure (E.82).
- Modify allocations to include Land at Merryboys Rd, Cliffe Woods as reserve site; add contingency policy for housing supply (E.138).
- Policy should prioritise Bus Rapid Transit and sustainable travel funding over general highway infrastructure (E.184).

Site-Specific Concerns

- Policy SA11: Concern over site SR14 (Land south of View Rd, Cliffe Woods) adjacent to Ancient Woodland (4606).
- CHR14 allocation unsound: large section in Flood Zone 3b; vulnerable development breaches NPPF; restrict 3b to water-compatible use; reflect in SA11 (E.117).
- CHR14: oppose non-water-compatible development in 3b; residential acceptable only in Zone 1 with safe access and mitigation (E68).

Infrastructure, Services & Community Impact

- Lack of safe walking/cycling routes raises accident risk; absence of open spaces harms health; long school travel increases absenteeism; early residents face isolation; weak public realm fosters anti-social behaviour; nearby urban areas overstretched; emergency/social services face delays (4903).
- Estuary environmental capacity not cooperatively managed (E.120).

Housing Supply & Deliverability

- Concerns over deliverability of several sites; identify additional sites for short-term and 5-year housing targets (E.166).

Response:

Concerns were raised on the impacts of development on the character of rural settlements/villages. Concerns over deliverability, and housing supply/targets and infrastructure requirements are addressed in the Topic Papers and updated IDP.

SA12: Other Sites

11 representations have been received from the following consultees

ID	Name	Stakeholder
4875	Kent Downs AONB Unit (Ms Catherine Hughes, Planning and Place Manager)	Statutory Bodies
E.68	Environment Agency	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.117	Nightingale Homes	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.166	Bellway Strategic Land (Mierscourt Road)	Developers or Agents
E.167	Bellway Strategic Land (South of Moor Street) (Phase 1)	Developers or Agents
E.170	Richborough	Developers or Agents
E.171	Redrow Homes Limited	Developers or Agents
E.172	Mr Richard Castle	Developers or Agents

Support

A few representations support this policy with a number of representations endorsing various sites.

Issues:

Soundness Concerns (E.68, E.117, E.166–E.172)

- **RWB2:** Unsound as a large section lies within Flood Zone 3b. More vulnerable development here is contrary to NPPF. Site only sound if Flood Zone 3b is restricted to water-compatible uses. Sequential approach required; FRA must show no floodwater displacement or increased risk elsewhere (E.68).

- **RWB25:** Unsound due to Flood Zone 3b. Water-compatible development only in this zone; more vulnerable uses acceptable only with flood defence works. Development must provide setback from tidal Medway and access margin for defence maintenance. FRAP required within 16m of defence. Flood constraints may significantly limit development (E.68).
- **SR48 & SR49:** Sound only if flood risk comments are addressed. Sequential approach required. SR49: No objection in principle, but site will face flood risk during lifetime; site-specific FRA needed. SFRA should guide suitable development (E.68).
- **FP6:** Delivery within first 5 years doubtful. Combined with minimal buffer and BNG requirements, maintaining 5-year housing supply will be challenging (E.117).
- **Housing Supply:** Significant concerns over deliverability of several allocations, especially short-term. Additional sites needed to meet housing requirement over Plan period and first 5 years (E.166).
- **Land East of Mierscourt Road (part of RSE10):** Suitable, available, and achievable now; should be included under SA12 to address immediate housing shortfall (E.166).
- **Bellway Proposal:** Previously preferred site removed without consultation. Two phases (200 + 250 homes) deliverable and aligned with spatial strategy; should be included under SA12 (E.167).
- **Middle & Lower Stoke Sites (AS14, AS15, AS17):** Promoted for allocation; submission includes two Design Development Statements and a Masterplan (E.172).

Response:

Concerns raised about deliverability and flooding. A topic paper has been prepared on site specific flood risk assessment. The Council has prepared an Infrastructure Delivery Plan.

SA13: Frindsbury Peninsula Opportunity Area

34 representations have been received from the following consultees:

ID	Name	Stakeholder
4355-4361, 4393	Scotline (Mr Jamie Lowe)	Business
4848	Mrs Emma Aldous	Members of the Public
E.17	Roger Backway	Members of the Public
E.65	P Sharp	Members of the Public
E.68	Environment Agency	Statutory Bodies
E.79	Historic England	Statutory Bodies
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.110	NHS Kent and Medway	Statutory Bodies
E.116	Blue Harbour Investment Ltd	Developers or Agents
E.122	Catesby Strategic Land Limited	Developers or Agents
E.123	Veetee Rice Ltd	Developers or Agents

E.148	Natural England	Statutory Bodies
E.150	Mr Kevin Rice	Developers or Agents
E.157	Hallam Land (acting for Tarmac and Holcim UK)	Developers or Agents
E.164	Network Rail	Statutory Bodies
E.192	Frindsbury Extra Parish Council	MPs, Members and Parish Councils
E.204	Kent County Council	Statutory Bodies

Support

A number of representations were received in support of this policy. There were a range of issues raised with general support for the allocation as well as other issues, for example the mix of uses allowed, provision of general supporting infrastructure, transport upgrades, protection of heritage and archaeological assets, development phasing and provision of supporting public health evidence.

Issues:

Policy Clarity & Delivery

- Need for clear timetabling and policy wording to enable site delivery before framework adoption; avoid vagueness and provide certainty on delivery and funding (E.116, E.122, E.123, E.150, E.157, E.192).
- Consider other sites as 'independent' allocations (E.116).
- Querying site capacities in SA (E.123).

Employment & Business Impact

- Concern over job losses for businesses unable to relocate (4357).
- Loss of deep-water access, open storage, and river proximity for operators (4356).
- Concern over loss of employment land (E.17).
- Allocation policy perceived as favouring businesses most able to relocate (4361).
- Lack of consultation with existing businesses (E.65).

Infrastructure & Access

- Protection of nationally important maritime infrastructure and safe public access near maritime zone safety (4355, 4358).
- Update Figure 16 to show all operational commercial wharf areas on west Frindsbury Peninsula (4393).
- Link policy to transport improvements at Strood Station to support active travel and emissions reductions (E.164).

Flood Risk & Environmental Concerns

- Concern over flood risk and residential use (1488, 4359, 4360).
- Need for Strategic Flood Risk Assessment Plan before development (E.68).
- Proximity to MCZ raises ecological impact concerns and need for mitigation (E.148).

Land Use & Development

- Concern about fragmented land ownership; propose wider opportunity area for whole Frindsbury Peninsula (E.150).

- Concern over overdevelopment in an area unable to support current development (4848).

Response:

Objections to this policy related to requests for greater clarity within the wording in relation to delivery of sites, phasing, site capacities and provision of infrastructure as well as concerns over the protection of marine infrastructure and loss of jobs.

The Council support the long term vision for this location.

SA14: Employment Sites

28 representations have been received from the following consultees:

ID	Name	Stakeholder
4362	Scotline (Mr Jamie Lowe)	Business
4610	CPRE Kent	Voluntary and Community Organisations
4666	Mr Awad Chishty	Members of the Public
4750,4751	Miss Jackie Forrest	Members of the public
4786	Kent Downs AONB Unit	Statutory Bodies
4909	AC Goatham & Son	Developers or Agents
4923	Tonbridge and Malling Borough Council	Statutory Bodies
4942	Mrs Gillian Mulloy	Members of the Public
E.47	Esquire Developments (Flanders Farm)	Developers or Agents
E.57	National Grid Electricity Transmission (NGET)	Statutory Bodies
E.68	Environment Agency	Statutory Bodies
E.81	Southern Water	Statutory Bodies
E.83	Terance Butler Holdings	Developers or Agents
E.104	Medway Liberal Democrats	MPs, Members and Parish Councils
E.116	Blue Harbour Investment Ltd	Developers or Agents
E.121	Goodman (Stantec)	Developers or Agents
E.124	National Grid	Statutory Bodies
E.148	Natural England	Statutory Bodies
E.161	Peel Waters	Developers or Agents
E.177	Church Commissioners for England	Developers or Agents
E.184	Hoo Consortium	Developers or Agents

Support

Supporting representations show general support for the policy with recognition of the importance of the allocated employment sites and the delivery of floorspace. Others supported and made general observations around considerations in bringing forward the employment allocations.

Issues:

Employment Land & Policy

- Greenfield employment sites contradict brownfield-first policy (4842).
- Policy amendment requested to allow greenfield sites to come forward in parallel with brownfield (E.184).
- Concern over phasing of employment site delivery; suggested wording to specify timing (E.121).
- Request for earlier allocation site phasing (E.177).
- Concern over reliance on Kingsnorth and Isle of Grain; need suitable alternative sites for SMEs early in plan period (E.116).
- Concern over loss of MCE given lack of commercial sites for businesses (E.201).

Infrastructure & Transport

- Need pedestrian/cycle crossing over A228; include in IDP (4610).
- Policy amendment to prioritise Bus Rapid Transit and sustainable travel funding over general highway infrastructure (E.184).
- Concern over lack of new infrastructure where electricity demand will rise (E.57).

Energy & Decarbonisation

- Proximity of allocation sites to National Grid Electricity Transmission plc (NGET) assets (E.57).
- Need to consider decarbonisation and renewable energy to achieve net zero (E.57).

Flood Risk & Environmental Protection

- Refurbishment of existing flood defences (IDP) as pre-condition for Kingsnorth allocations; concern over funding source (E.68).
- Concern over employment allocations near environmentally protected areas; suggested policy wording provided (E.148).
- Proximity of IPM to Kent Downs National Landscape requires policy reference for sensitive design (E.148).
- Policy needs site-specific criteria for sites within KDNL setting; objection to lack of such criteria (4786).

Maritime & Wharf Access

- Need for wharf access and open storage for maritime operations; protect maritime use (4362).
- Against Chatham Docks development (4666).

Response:

A number of responses were received in relation to this policy. Some requested greater detail on site policies, others were concerned over the impact over the development of employment sites. The Council supports some modifications to strengthen policy wording.

Appendices

Appendices A: Local Centres, Rural Centres, Shopping Parades and Neighbourhood Centres

1 representation has been received from the following consultees:

ID	Name	Stakeholder
E.161	Peel Waters	Developer or Agent

Support

Representation support Appendix A.

Issues:

- The LC18 plan should be amended to include the terrace of commercial/retail units facing the dock within Chatham Waters (E.161).
- Also include Local Centre for planned growth through the river waterfront site allocation (E.161).

Response:

This could be addressed through minor amendments regarding LC18.

Planned growth along the river waterfront is not in-keeping with the retail evidence base.
Determine appropriateness through the masterplan and planning application.

Appendix B: Vehicle Parking Standards

1 representation has been received from the following consultees:

ID	Name	Stakeholder
E.161	Peel Waters	Developer or Agent

Support

Representation supports Appendix B.

Issues:

- Requests for updates to reflect current use class order (E.161).
- Request a bespoke approach for residential standards on brownfield sites rather than minimums (E.161).

Response:

These changes could be addressed with minor amendments.

Appendix C: Fields in Trust Standards

0 representations have been received from the following consultees:

ID	Name	Stakeholder
N/A	N/A	N/A

Support

No comments logged.

Issues:

No issues logged.

Response:

No issues logged that require a response.

Appendix D: Safeguarded Waste Sites

1 representation has been received from the following consultee:

ID	Name	Stakeholder
E.161	Peel Waters	Developer or Agent

Support

Representation supports this Appendix D but requests the removal of the safeguarded site at Chatham Docks. It is allocated for development.

Issues:

No issues logged

Response:

No issues logged requiring a response.

Evidence base

Sustainability Appraisal

Comments related to Sustainability Appraisal and responses

Rep no.	Respondent	Summary of comments related to SA	SA response
1	Barratt David Wilson (BDW) Homes [E.173]	<p>Support Site SNF1 Land West of Strood as preferred site</p> <ul style="list-style-type: none"> • BDW pleased SA recognises the positive contribution of sites forming Land West of Strood, including SNF1. • Believe SA provides a robust assessment of proposed spatial growth options. • Welcomes that Land West of Strood is included within the “Blended Strategy” following review of available land and engagement with GBC. • Supports revised Green Belt boundaries and the release of Land West of Strood. 	<ul style="list-style-type: none"> • Comments noted. No specific response.
2	Bellway Strategic Land [E.165]	<p>Disputes the rejection of Site SNF3 (Brompton Farm, Strood) in Interim SA</p> <ul style="list-style-type: none"> • Loss of BMV agricultural land – Criticises over-reliance on Natural England ALC maps. Land has historically been used for non-agricultural purposes. An ALC Report would be needed to grade the land, which can be submitted alongside a planning application. • Green Belt and coalescence - Feels MC has not fully considered the extent of the physical barriers such as the A289 preventing urban sprawl and potential coalescence. BSL recommends a revaluation against the 5 purposes of a Green Belt in paragraph 140 of the NPPF. • Beyond reasonable walking distance to current public transport - Recognises the site covers a large area, but states that the site is within reasonable walking distance to current public transport services, specifically bus 190 that is located within 400 metres from site access. • Overall, believes SNF3 performs better and is in a less sensitive landscape area than preferred sites such as Hoo Peninsula. 	<ul style="list-style-type: none"> • Site SNF3 was ‘rejected’ according to the Council’s preliminary selection/rejection of sites at the R18 stage, as documented in the R18 Interim SA. At the R19 stage however the site has been ‘selected’ as shown in Appendix I of the R19 SA (Vol 3). Irrespective of this, the reasons for selection and rejection presented in the SA are intended as the Council’s outline summaries only. The SA provides a proportionate summary of the Council’s rationale, rather than a detailed justification. • Site SNF3 has been evaluated in the SA alongside other reasonable alternative strategic sites using the same methodology as set out in Chapter 2 (Vol 2) and Appendix E (Vol 3) of the R19 SA. As explained in these sections, SA operates at a strategic level and is reliant upon secondary information and details provided by the Council. The precautionary principle is applied in the SA assessments; for example, in absence of detailed soil surveys for each site, Natural England’s provisional ALC maps are used as a

Rep no.	Respondent	Summary of comments related to SA	SA response
			proportionate indicator of soil quality.
3	Berengrave Lane 2 Ltd [E.93]	<p>Support for Vision, Objectives & Spatial Strategy, and allocation of Site RN17</p> <ul style="list-style-type: none"> Berengrave Lane 2 Ltd supports Medway 2041 Vision, Strategic Objectives, and Strategic Spatial Strategy. Supportive of the response made to Reg 18 representations re. objectively assessed need and the Interim SA assessments. Consider that the SA now provides robust assessment of proposed spatial growth options. Supports inclusion of Site RN17 in the “Blended Strategy”. <p>Dispute SA consideration of mitigation for Site RN17</p> <ul style="list-style-type: none"> Question the residual minor negative effects identified in the post- mitigation assessment of Site RN17, suggesting no effect against landscape or pollution, and positive effects against health. 	<ul style="list-style-type: none"> All reasonable alternative sites including RN17 have been evaluated in the SA using a consistent methodology against each SA Objective (see Appendix E (Vol 3) of the R19 SA). The pre-mitigation assessment of non-strategic sites can be found in Appendix G, and post-mitigation assessment in Appendix I of the R19 SA. The approach taken is consistent for all sites, aiming to aid the Council’s decision-making by illustrating the relative performance of sites both with and without mitigation.

Rep no.	Respondent	Summary of comments related to SA	SA response
4	Catesby Strategic Land (Lower Rainham Road) [E.190]	<p>Spatial delivery options</p> <ul style="list-style-type: none"> Assessment of SDOs in the SA highlighted that North of Rainham performed comparatively well, but the R19 Plan only allocates c.863 homes in this area. Recommend this figure should be higher. <p>Spatial growth options</p> <ul style="list-style-type: none"> Recommend that the SGOs are reviewed against the residential threshold of the SDOs, to result in a greater spread of housing across the district. <p>Assessment of Site RN5</p> <ul style="list-style-type: none"> Object to the reasons for rejection of Site RN5 including loss of BMV land, coalescence between settlements, adverse effect on Conservation Area, and location beyond reasonable walking distance to public transport. Suggests this conclusion does not consider the post mitigation potential of the sites. Catesby's own assessment of RN5 indicates a large proportion of the site is Grade 3b land rather than Grade 1 as per Natural England's provisional ALC maps. Air quality is improving in the nearby AQMA. New local services will be provided. A very low proportion is at risk of flooding. Suggests an inconsistent approach to site selection, with other sites performing worse (e.g. coalescence effects in Capstone Valley). Question the selection of RN8 and rejection of RN9 when they form part of the same site. 	<ul style="list-style-type: none"> Spatial delivery options (SDOs) represent broad locations which could provide a mixture of sites, with theoretical housing capacities outlined. While the SDOs helped to inform the identification and evaluation of spatial growth options (SGOs), the SGOs provided more detail and considered the realistic and up-to-date capacity information according to the Council. All reasonable alternative sites have been evaluated in the SA on a comparable basis using the same methodology (Appendix E of the R19 SA, Vol 3). All data sources and assumptions taken in the high-level assessment have been explained. The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council.
5	Catesby Strategic Land Limited (Land East of Stoke Road) [E.122]	<p>Lack of reasonable growth options</p> <ul style="list-style-type: none"> Feels SA "fails" to assess realistic alternatives to the preferred growth strategy and is not transparent regarding the selection process. CSL wants to see all four 'Assessment of Growth' Options at Reg 18 to allow for a "<i>consolidated comparative index matrix that assesses all four options side by side.</i>" Disputes that the lack of DtC is a viable reason for rejection of options 2 and 4, which they consider address unmet housing need. <p>Lack of spatial delivery alternatives</p> <ul style="list-style-type: none"> CSL believes additional spatial delivery options that could accommodate unmet housing needs in neighbouring areas, such as an 	<ul style="list-style-type: none"> All reasonable alternatives and options identified by Medway Council have been evaluated in the SA process, taking into account options that are deemed realistic given Medway's constraints. The scoring matrix tables are used as a tool to visually summarise assessment findings for reasonable alternatives, options and policies evaluated in the SA process. The narrative assessments provide the full detail and explanation. Given the high-level nature of the growth options, representing quanta alone, the provision of a

Rep no.	Respondent	Summary of comments related to SA	SA response
		<p>increase of 1,000 dwellings, should have been considered. Further spatial delivery options should include:</p> <ul style="list-style-type: none"> ○ New settlement/strategic village – significant growth in unconstrained areas requiring focused infrastructure. ○ Transport-led growth – development along key rail and road corridors (e.g., Strood station, Medway Valley Line, new Hoo Peninsula services) to support modal shift from car dependency. <p>Employment-led growth – further growth near industrial areas such as Isle of Grain, Kingsnorth, and Chatham.</p>	<p>matrix for comparison would be indifferent and thus not helpful to compare.</p> <p>At the R19 stage, the latest housing need evidence was reviewed and led to Medway Council identifying the new Growth Option '3' and '4'; these were effectively to replace the now obsolete Option 1 and 2 that were based on previous evidence. As such, a consolidated matrix comparing the four options side by side would be unnecessary.</p>
6	Councillor Ron Sands [E.41]	<p>Objects to growth on Hoo Peninsula</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The reasons for selection and rejection presented in the SA are intended as outline summaries only and have been provided by the Council.
7	Diocese of Rochester [E.84]	<p>Dispute rejection of Site CHR2 & CHR5</p> <ul style="list-style-type: none"> • Disagree with CHR2 and CHR5 being rejected; feels choice fails to meet local needs and misrepresented in R18 SA. • Assessment in the SA unfair: sites labelled non-residential despite Savills promoting them for residential use. <p>Objections to SA summary reasons for rejection:</p> <ul style="list-style-type: none"> • Criticises rejection based on BMV agricultural land loss: <ul style="list-style-type: none"> ○ CHR5 has not and will never be used for agriculture. ○ CHR2 predominantly consists of poor-quality agricultural land (Grade 4). • Dispute that sites could be affected by traffic/air pollution from Lower Thames Crossing. Sites have no direct relationship with M2. 	<ul style="list-style-type: none"> • As explained in response to R18 reps, reasonable alternatives have been identified by Medway Council and evaluated in the SA based on the red line boundary and proposal information provided. The Council confirmed that CHR2 and CHR5 continued to be considered reasonable for non-residential use only at the R19 stage. • The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council. • Both sites CHR2 and CHR5 have been evaluated in the SA alongside other reasonable alternatives on a comparable basis using the same methodology (see Appendix E of the R19 SA, Vol 3). The SA assessment against SA Objective 6 (Natural Resources) concurs that CHR2 does not include any BMV land, although CHR5 is wholly Grade 3 i.e. potential BMV land (in absence of soil survey data).
8	Environment	Flooding impacts and evidence	<ul style="list-style-type: none"> • All reasonable alternatives and options have been

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	Agency [E.68]	<ul style="list-style-type: none"> The SA, SFRA and Flood Risk Sequential Test Report 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. Believe that the SA summary of residual effects table which states that <i>"Subject to achieving the recommendations set out in the SFRA, it is likely that the MLP will have a negligible effect on flooding"</i> has no justification or evidence to support it as many of the allocated sites are in high-risk flood areas. No reference is made in the SA to the TE2100. <p>Spatial Delivery Options</p> <ul style="list-style-type: none"> Unclear how the spatial delivery options have been identified by Medway Council, with respect to the EA's comments on various local plan policies. 	<p>identified by Medway Council as the Plan makers and evaluated in the SA based on the information and evidence base documents available at the time of writing as provided by the Council. The SA assessment findings were fed back to Medway Council to aid their decision making, including the selection/rejection of sites and the spatial strategy.</p> <ul style="list-style-type: none"> The SA conclusion on flood risk is based on the strategic evidence available at the time of writing. It recognises that detailed flood risk matters will be addressed through implementation of the Level 2 SFRA recommendations and site-specific FRAs. The conclusion of the SA is therefore considered to be proportionate. The Thames Estuary 2100 (TE2100) Plan is referred to in the R19 SA in the context of site assessments and implications for flood defence schemes where relevant.
9	Friends of Deangate Ridge Country Park Committee [E.127]	<p>Legal compliance</p> <ul style="list-style-type: none"> Evidence and planning documents are being prepared without an extension to the Regulation 19 consultation period. The Local Plan is not in conformity with adopted neighbourhood plans or the NPPF. Believes the SA fails to legally satisfy the SEA Directive, and there is insufficient integration between the HRA and SEA. The number of homes proposed for the Hoo Peninsula is unsustainable and there is no evidence of buffer zones being applied to SPAs, SSSIs and Ramsar sites. 	<ul style="list-style-type: none"> The R19 SA Report has been prepared to meet the legal requirements of the SEA Regulations. Figure 2.3 of the R19 SA (Vol 2) summarises where each of the requirements of an 'Environmental Report' have been met. At the time of preparing the R19 SA, the latest outputs of the HRA process were integrated (the Interim HRA). The Interim HRA declared uncertainty regarding air quality and recreational impacts where the evidence base was emerging. The findings of the final HRA will be taken into account in future SA outputs when available.
10	Friends of the North Kent Marshes [H.82]	<p>Dispute growth in Hoo Peninsula</p> <ul style="list-style-type: none"> Objects to allocations on the Hoo Peninsula and lack of HRA and SA evidence to support the Plan during the Regulation 19 Consultation given the interim status of the HRA Report. 	<ul style="list-style-type: none"> The R19 SA assessments were based on the best available information at the time of preparation, including the interim outputs of the HRA process. The findings of the final HRA will be taken into account in future SA outputs when available.

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11	Gleeson Land [E.118]	<p>Housing</p> <ul style="list-style-type: none"> Housing delivery rates unrealistic; many short- and medium-term sites may not yield as planned due to brownfield complexity. Insufficient stress-testing for higher growth; recommends additional growth focused on viable sites such as greenfield, particularly Land East of Buckland Road. <p>Green Belt</p> <ul style="list-style-type: none"> Exceptional circumstances do not justify release; no evidence it is the only option. Suggests modifying plan to remove proposed Green Belt release and allocate other suitable sites, including Land East of Buckland Road, Cliffe. <p>Disputes rejection of Site SR6 'Land East of Buckland Road, Cliffe'</p> <ul style="list-style-type: none"> Disputes rejection of the site, feels the SA "<i>identified inaccurate conclusions</i>" and council did not consider all information. Notes inconsistency: allocated sites (e.g., SR51) scored worse than non- allocated sites (e.g., SR6). <p>Objections to SA summary reasons for rejection:</p> <ul style="list-style-type: none"> Close proximity to SSSI: Habitat, noise, SUDS, and recreation pathways mean impacts are neutral or positive; no negative impacts anticipated. Loss of BMV agricultural land: Rejection not justifiable; similar scoring sites allocated, showing inconsistency. Coalescence: Limited potential due to railway, pylons, vegetated fields, and rising topography. Walking distance to public transport: Mostly within reasonable distance; simple direct route improvements proposed. Site availability: Land controlled by Gleeson, can deliver 70 dwellings within first 5 years. 	<ul style="list-style-type: none"> All reasonable alternative sites have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The reasons for selection and rejection presented in the SA are intended as outline summaries only and have been provided by the Council. Site SR51 has been evaluated in the SA alongside other non-strategic reasonable alternative sites (e.g., SR6) on a comparable basis using the same methodology, as set out in Appendix E of the R19 SA. The SA is not responsible for conducting an 'exceptional circumstance' test for the Green Belt and instead relies on the evidence provided by the Council at the time. This is referred to in paragraph 12.1.10 of the R19 SA (Vol 2), and the Green Belt Review itself is published as part of the evidence base for the Plan¹.

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12	Gravesham Borough Council [E.191]	Gravesham Borough – Unmet Housing Need <ul style="list-style-type: none"> Notes that the SA has considered meeting Gravesham's unmet housing need, with the delivery of additional homes performing strongly against SA Objective 7 (housing), but creating more significant negative impacts on environmental sustainability objectives and increase pressures on Medway's transport network and social infrastructure. In principle, supports the approach set out in the emerging Local Plan and confirm that GBC and MC have engaged constructively via Duty to Cooperate discussions. 	<ul style="list-style-type: none"> Comments noted. No specific response.
13	Hallam Land (acting for Tarmac and Holcim UK) [E.157]	Object to rejection of Site CHR4 Holborough Quarry <ul style="list-style-type: none"> Holborough Quarry should be reconsidered; outperforms some allocated sites; site selection inconsistent. Support SA assessment findings that Site CHR4 scores highly for various SA Objectives (housing, education, climate change adaptation, employment) and concurs with some adverse effects in line with other strategic sites (climate change mitigation, pollution and waste). Question assessment against cultural heritage, suggesting positive cultural and industrial heritage interpretation has not been considered by the SA despite previous R18 comments. Suggest positive effects on landscape, health and biodiversity will be achieved subject to planning policy requirements. Recognise that while an adverse effect against natural resources is consistent with other strategic sites, CHR4 represents Grade 2 and 3 rather than Grade 1 and has been subject to disturbance through quarrying so performs better than other sites. Object to the reasons for rejection of Site CHR4 in the SA. 	<ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The reasons for selection/rejection presented in the SA are intended as outline summaries only, and have been provided by the Council. All sites have been evaluated in the SA on a comparable basis using the same methodology and source of information provided by the council. Sites have been evaluated pre- and post-mitigation to provide transparency and consistent scoring. The methodology used can be found in Appendix E of the R19 SA (Vol 3). This includes application of the NPPF definition of previously developed land (i.e. excluding quarries), and a precautionary approach to cultural heritage and landscape impacts.
14	Halling Parish Council [E.178]	Support for up to date plan policies <ul style="list-style-type: none"> Supports the environmental policies and objectives of the plan. Recognises that some of the plan has missing evidence base documentation, but is assured this will be completed. Recognise legal compliance of the Plan including completion of the SA/SEA. 	<ul style="list-style-type: none"> Comments noted. No direct response.
15	High Halstow and St Mary Hoo	Dispute growth in Hoo Peninsula <ul style="list-style-type: none"> Believes there is no justification for promoting such a large-scale development in an area where sites are greenfield, high-quality 	<ul style="list-style-type: none"> The R19 SA Report has been prepared to meet the legal requirements of the SEA Regulations. Figure 2.3 of the R19 SA (Vol 2) summarises where each of the

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	Parish Councils [H.117]	<p>agricultural land, isolated and remote from key services, facilities, and employment.</p> <ul style="list-style-type: none"> Feels exploration of harm caused by development is limited, with an <i>“inadequate and incomplete SA, HRA and Transport Assessment”</i>. 	<p>requirements of an ‘Environmental Report’ have been met.</p> <ul style="list-style-type: none"> The R19 SA assessments were based on the best available information at the time of preparation, including the interim outputs of the HRA process. The findings of the final HRA will be taken into account in future SA outputs when available.
16	Higham Parish Council [E.211]	<ul style="list-style-type: none"> Strongly oppose the Medway Local Plan. Comments found in The Alliance of Hoo Peninsula Parishes Rep. 	<ul style="list-style-type: none"> See Rep No 33 below from Alliance of Hoo Peninsula Parishes [E.119].
17	Homes England (Chattenden Barracks) [E.176]	<p>Object to rejection of Site HHH3 Chattenden Barracks</p> <ul style="list-style-type: none"> Criticises SA approach as outdated; site consistently scored well across 12 indicators but omitted due to “ecological uncertainty”. Evidence provided demonstrates robust mitigation and compensation measures to address ecological concerns. Inconsistent scoring compared to nearby allocated site HHH6; HHH3 performs better in landscape, flooding, and pollution categories yet scored more negatively. Aligns with Council’s brownfield-first strategy; SA underestimates site capacity, which could deliver ~450 additional homes. 	<ul style="list-style-type: none"> All reasonable alternatives have been identified by Medway Council and evaluated in the SA based on the red line boundary and proposal information provided. The Council confirmed that the capacity for Site HHH3 should be reduced to 400 dwellings at the R19 stage. The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council. Site HHH3 has been evaluated against other reasonable alternative strategic sites on a comparable basis using the same methodology, as found in Appendix E of the R19 SA (Vol 3). Whilst HHH3 performs better against some receptors than HHH6, it performs worse in others. Site HHH3 lies directly adjacent to the SSSI boundary and wholly within 400m, whereas a small proportion of HHH6 lies within the 400m. While the benefits of proposed mitigation for HHH3 are acknowledged in the SA (paragraph F.4.2.1) overall the development is considered likely to result in a major negative effect based on the available information at the time of assessment.

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18	Homes England (Lodge Hill Camp) [E.185]	<p>Object to rejection of Site HHH1 Lodge Hill Camp</p> <ul style="list-style-type: none"> Believes SA is inaccurate and misleading: SA states site is not previously developed land (PDL) under NPPF, but Medway Council's LAA (2025) confirms it is. Feels SA misinterpretation leads to incorrect methodology and scoring, distorting evaluation of environmental and sustainability impacts. Believes objectivity and robustness of evidence base are undermined; inconsistent evidence base affects credibility and consideration of other potential site allocations. Site located outside the SSSI and is a brownfield site. Contains existing buildings that can be reused, intensified, or replaced by wholesale development. Dispute reasons for rejection in SA: <ol style="list-style-type: none"> Potential Loss of BMV Agricultural Land - Site has not been in agricultural use for 150 years. No potential for agricultural use given brownfield status. Coalescence Between Settlements - Large parts of land between Chattenden Village and site comprise natural and built barriers. Reuse of Lodge Hill Camp will not result in coalescence; development occurs within existing site rather than surrounding land. Walking Distance to Public Transport - Bus stop 750m away on Lodge Hill Lane (above 400m threshold), but distance not prohibitive. Site can provide localised employment opportunities without long travel. Expectation that Lodge Hill Camp infrastructure will contribute to enhanced public transport provision, as with other site allocations in area 	<ul style="list-style-type: none"> Site HHH1 has been evaluated in the SA alongside other non-strategic reasonable alternative sites on a comparable basis using the same methodology (see Appendix E of the R19 SA, Vol 3). Although the site contains some existing development, it would not be consistent with the NPPF definition of a previously developed site given there are undeveloped areas within the site boundary. The site lies directly adjacent on all sides to the SSSI, and development will have potential to adversely impact biodiversity. The precautionary principle is applied in all SA assessments.

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19	Hoo Parish Council [E.44]	<p>Support the evidence presented in the SA for Hoo Peninsula</p> <ul style="list-style-type: none"> Believes the SA report evidence demonstrates that the Hoo Peninsula is the “<i>most harmful and unsustainable option</i>”, which Medway Council has ignored. <p>Growth Options</p> <ul style="list-style-type: none"> Critiques the SA’s proposal of the three growth options as “<i>crude, manufactured options</i>”, with the Hoo Peninsula proposals “<i>buried into a wider ‘blended option’</i>” which they believe is incoherent. States there is no need to include excessive urbanisation of rural parish in any of the options. Believes there should be proper consideration of more sensible and balanced options. Recommends that the Sustainability Analysis be taken again, focused on growth options properly informed by national policies. 	<ul style="list-style-type: none"> The SDO evaluation in the SA demonstrates how the Council has explored different reasonable growth options that can be combined in different ways to form spatial strategy options (i.e. the SGOs); the Council has identified which combinations or parts of SDOs could reasonably be grouped to form spatial options and meet housing needs, drawing on the SA findings and other evidence base information.
20	Kent County Council [E.204]	<p>Supports SA, recommendations for policies</p> <ul style="list-style-type: none"> KCC supports the SA Framework used to assess the strategic, thematic and development management policies, and site allocation policies. Recommends stronger inclusion of adaptive measures at relevant sites and Policy S25: Energy Supply to ensure resilience to climate risks and alignment with SA Objective 2 ‘Climate Change Adaptation’. 	<ul style="list-style-type: none"> Comments noted. No specific response.
21	Kent Wildlife Trust [E.67]	<p>SA & site allocation concerns</p> <p>SA (and HRA) does not provide sufficient reassurance that irreversible impacts can be avoided, associated with allocated sites adjacent or near internationally and nationally designated sites and other ecologically sensitive areas, such as:</p> <ul style="list-style-type: none"> Habitat fragmentation Recreational disturbance Increased domestic pet predation Pollution from noise, lighting, and air quality. <ul style="list-style-type: none"> Primary concern sites: Capstone Valley, Hoo, St Werburgh, Chattenden, and land west of Strood. Site selection process unclear regarding adherence to mitigation hierarchy in the draft Local Plan. 	<ul style="list-style-type: none"> The SA assesses the impact of all sites based on the information provided by the Council and other available evidence at the time of preparation. This includes evaluating the effect pre- and post-mitigation. Residual effects following mitigation, including threats and pressures to biodiversity designations as noted by KWT, were identified in the R19 SA, with recommendations and monitoring suggestions also provided to the Council. The SA, incorporating SEA, is a strategic level assessment at the plan-wide scale, and cannot predict outcomes with absolute certainty especially where these relate to site-specific circumstances that require more detailed analysis.

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		<ul style="list-style-type: none"> Concern that SA and Local Plan leave resolution of environmental impacts to the application stage. 	The limitations of the SA are declared in section 4.6 of the R19 SA (Vol 2).
22	Mr Kevin Rice [E.150]	<p>Assessment of Site SR40 (now part of SR53 Frindsbury Opportunity Area)</p> <ul style="list-style-type: none"> Mr Rice disagrees with the reduction of the site's capacity from 200 to 90 dwellings in the SA; reduction of 110 dwellings does not make the most effective use of land, especially given Medway Council's need to deliver significant additional homes. Concerns raised regarding SA site scores for climate change adaptability, pollution and waste, and health and wellbeing objectives, even after considering mitigation in proposed Local Plan policies. Flood Risk: Accommodation above ground level can be incorporated into policy wording to ensure this is not a concern. This will enable independent delivery of sites within the MCE if strategic mitigation is slow to come forward or takes several years to complete. Strategic approach to flood risk mitigation within the Opportunity Area allocated under Policy SA13 will address climate change mitigation concerns in the long term. Health and Wellbeing: Medway is prioritising development in the urban area. Given delivery of several brownfield sites in Strood Rural, a joined-up approach is needed to ensure access to health services and opportunities for new outdoor leisure space via the Frindsbury Peninsula Planning Framework. 	<ul style="list-style-type: none"> All reasonable alternatives have been identified by Medway Council and evaluated in the SA based on the red line boundary and proposal information provided. The Council confirmed that the capacity for Site SR40 should be reduced to 90 dwellings at the R19 stage. All sites have been evaluated in the SA on a comparable basis using the same methodology and source of information provided by the council. Sites have been evaluated pre- and post-mitigation to provide transparency and consistent scoring. The methodology used can be found in Appendix E of the R19 SA (Vol 3).
23	Mrs Gillian Mulloy [1601]	<p>Transparency in consultation feedback and site selection</p> <ul style="list-style-type: none"> Believes clear evidence should be provided showing how feedback from consultations on the interim SA and HRA reports has substantively influenced Plan revisions. Plan must document all potential sites considered and rejected, including reasonable alternatives, to demonstrate a comprehensive assessment. <p>Assessment of reasonable alternatives</p> <ul style="list-style-type: none"> Consultation process must comply with Environmental Assessment of Plans and Programmes Regulations 2004, including meaningful 	<p>The R19 SA Report has been prepared to meet the legal requirements of the SEA Regulations. Figure 2.3 of the R19 SA (Vol 2) summarises where each of the requirements of an 'Environmental Report' have been met. This includes a Non-Technical Summary (Vol 1).</p> <ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and objectively evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options.

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		<p>engagement and coordination with key statutory consultees and relevant authorities, particularly regarding air quality.</p> <ul style="list-style-type: none"> Suggests that housing numbers, different spatial distributions, and approach to prioritising brownfield land were not assessed on equal terms. Any proposed release of Green Belt land must be supported by comprehensive evidence demonstrating that all reasonable alternatives have been exhausted. <p>Suggests re-running the SA to ensure all reasonable alternatives are assessed and presented without bias and recommends publishing a non-technical, balanced summary of significant effects alongside the technical SA to support informed public comment.</p>	<ul style="list-style-type: none"> Chapter 5 of the R19 SA (Vol 2) explains the approach to reasonable alternatives in the SA process, including the different types of alternatives considered. All reasonable alternatives were assessed against the SA Framework using the methodology set out in Chapter 2 of the R19 SA, with consistent evaluation between options of the same type (e.g., growth options, spatial delivery options, spatial growth options, strategic sites, non-strategic sites). The outline reasons for selection and rejection of each option and reasonable alternative are documented in the R19 SA (see Chapter 5 of Vol 2, and Appendix J for reasonable alternative sites). Appendix C of the R19 SA documents consultation responses received during each SA stage and how they have been considered in the SA process.
24	Mrs Sarah Harrington [1646]	<p>Object to Sites SNF1–SNF3 and Green Belt / Grey Belt redesignation</p> <ul style="list-style-type: none"> Objects to redesignation from Green Belt to Grey Belt associated with Site SNF1, SNF2 and SNF3. Critiques SA and Green Belt Review for not convincingly demonstrating “exceptional circumstances” justifying change; evidence considered insufficiently transparent or independently validated. Highlights sustainability concerns: Strood near capacity for traffic, infrastructure, and services. Feels further development could strain resources. These sites play a role in preventing urban sprawl, maintaining separation between Strood and Gravesend, and preserving land openness. Suggests SA should explore and assess all suitable non-Green Belt/brownfield sites before altering boundaries. Emphasises potential for additional brownfield capacity within Strood that could meet development needs. 	<ul style="list-style-type: none"> Some 27 strategic and 335 non-strategic reasonable alternative sites have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. The SA is not responsible for conducting an ‘exceptional circumstance’ test for the Green Belt and instead relies on the latest evidence provided by the Council. Any update to the Green Belt Review (June 2025) can be taken into account in future SA outputs.

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25	Natural England [E.148]	<p>Requests clarification on mitigation</p> <ul style="list-style-type: none"> Development sites should avoid, or fully mitigate, impacts on protected landscapes and designated sites. Requests clarity on how potential negative impacts will be avoided or mitigated, highlighting concern for substantial effects on sensitive environmental areas. Policy S2 – Concerned that the Strategic Environmental Programme, including approach to development around Chattenden Woods and Lodge Hill SSSI, will not be agreed until post adoption of the Plan. SA reflects concerns that the policies will not fully mitigate adverse effects based on available information. Policy SA7 – Supports the SA findings that an adverse effect on the landscape is likely, and recommends additional policy wording to require “a landscape led, high-quality design, sensitive to the setting and special qualities of the National Landscape”. Policy SA8 – Supports SA recommendation that the findings and recommendations of the emerging Cumulative Ecological Impact Assessment should be taken into account within the MLP. <p>Comments on the SA monitoring indicators</p> <ul style="list-style-type: none"> Recommends the SA remains an iterative process, where Local Plan policies are amended following SA recommendations. Notes that not all SA recommendations are currently incorporated into the Plan or policy wording. Welcomes inclusion of monitoring indicators for biodiversity and landscape (Table 17.1), but requests clarification on data sources and methods for measuring biodiversity indicators (e.g., priority habitat areas, priority species populations). Suggests specific indicators for the Kent Downs National Landscape due to site allocations potentially affecting it. 	<ul style="list-style-type: none"> SA recommendations and assessments have been fed back to the Council on an iterative basis. Table 18.1 and 18.2 outline the recommendations made at the R18 and R19 stages, and how these have been considered by the Council. Any updates to MLP policies can be evaluated in the next SA output. The monitoring suggestions included in the R19 SA are derived from the SA assessment process, taking into account areas where potential adverse effects against the SEA topics were identified, as well as ensuring that positive effects of the Plan are being secured as expected. This includes some general points in line with the principles of the NPPF / best practice guidance, which the Council may wish to make more specific / targeted for the plan. Some are based on other evidence gathered for the plan (e.g., vehicle trip credits associated with the strategic transport assessment, and North Kent SAMMS implementation).
26	Nightingale Homes Ltd [800] [E.117]	<p>Evidence & site selection, object to rejection of Site RN2</p> <ul style="list-style-type: none"> NH believes the reasoning in the SA to support site allocations lacks a sufficient evidence base to explain why specific sites were chosen over others Claims there is a lack of consistency in site scoring, suggesting the 	<ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA based on the information provided by the Council. SA findings are fed back to the Council to aid their decision making and selection/rejection of options.

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		<p>SA may have been designed to support an intended outcome rather than being objectively prepared. For example, suggests inconsistent scoring between R18 and R19 SA in terms of access to bus stops following the revised site HHH22/HHH31 (allocations under Policy SA8: Hoo St Werburgh and Chattenden).</p> <ul style="list-style-type: none"> Dispute sites allocated under Policy SA6: Land West of Strood – Suggests reviewing whether exceptional circumstances test has truly been met and consider alternative options to meet housing needs without Green Belt release. Dispute sites allocated under Policy SA10: Lower Rainham – Reasons include previous refusal and appeal dismissal, with inspector recognising development would cause severe residual cumulative impact on local highways. Reduced quantum does not address infrastructure concerns; supporting SA evidence lacks “true justification” despite prior concerns in Reg. 18 version. Suggests removing site in favour of a more “sustainable” option such as RN2.. 	<p>The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council.</p> <ul style="list-style-type: none"> All reasonable alternative sites have been evaluated in the SA on a comparable basis using the same methodology (Appendix E of the R19 SA, Vol 3). Sites have been evaluated pre- and post-mitigation to provide transparency. For strategic sites, as explained in Appendix F (R19 SA, Vol 3), additional masterplan information was available to inform the assessment. Paragraph F.11.1.2 provides the assessment narrative against SA Objective 10 (Transport and Accessibility) for Site HHH22/HHH31 that includes provision of a new bus route. The SA is not responsible for conducting an ‘exceptional circumstance’ test for the Green Belt and instead relies on the evidence provided by the Council at the time. This is referred to in paragraph 12.1.10 of the R19 SA (Vol 2), and the Green Belt Review itself is published as part of the evidence base for the Plan¹.
27	Pump Lane Steering Group [E.208]	<p>Objects to Policy SA10 – Lower Rainham/Rainham Parkside Village</p> <ul style="list-style-type: none"> Proposal does not provide adequate mitigation to address the challenges of existing traffic situation. Development fails to protect valued landscapes and historic character, and would lead to loss of high-quality agricultural land. Assessment of harm should consider the aggregate impact on all designated heritage assets rather than evaluating them individually. (No specific comments on the SA) 	<ul style="list-style-type: none"> The SA includes an evaluation of the plan and its reasonable alternatives against a range of sustainability topics including those noted by the respondent, such as landscape, cultural heritage and soil. As required in the SEA Regulations, the SA includes an assessment of cumulative effects of the plan (see Chapter 16 of the R19 SA, Vol 2).

^{1 2} Medway Local Plan Green Belt Review. June 2025. Available at: <https://medway.oc2.uk/docfiles/30/Green%20Belt%20Review.pdf>

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28	Richborough [E.170]	<p>Object to site selection/rejection in the SA</p> <ul style="list-style-type: none"> Failed to assess site SR17 correctly – Regarding “<i>the mix of uses that have formed part of the proposals at each stage of the plan-making process, as well as the planning application submitted for the subject site (Ref: MC/25/0006)</i>”. Disagree with assessment of SR17 in SA: <ul style="list-style-type: none"> GP - submitted Vision Document included the delivery of a GP surgery; should have a positive impact. Secondary school - disparity between paragraph F.12.2.1 (minor positive impact) and table F.12.1 (minor negative impact), although post-mitigation (Table I.4.1) correctly shows minor positive impact. Believes there is insufficient justification as to why sites like Site HHH12 that score poorly against environmental objectives are allocated over sites like SR17 that score more favourably. To ensure the Local Plan is sound, additional evidence base documents must be prepared to justify the allocation of larger strategic sites. 	<ul style="list-style-type: none"> All reasonable alternatives have been identified by Medway Council and evaluated in the SA based on the red line boundary and proposal information (including site use) provided. All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA on a comparable basis, with findings fed back to the Council to aid their decision making and selection/rejection of options. In accordance with the SEA Regulations, the SA report presents an outline of the reasons for selecting or rejecting alternatives. The report provides a proportionate summary of the Council's rationale, rather than a detailed justification. SR17 has been evaluated in the SA alongside other reasonable alternative strategic sites using the same methodology as set out in Appendix E of the SA, plus consideration of further masterplan information supplied for each strategic site by the Council. The scoring is consistent with the approach taken to other sites. The vision document relating to SR17 provided did not include provision of a new GP surgery. There is an error in Table F.12.1; SR17 was identified to have a minor positive effect rather than minor negative effect against the ‘secondary school’ receptor as described in paragraph F.12.2.1.
29	RSPB England (Mr Joseph Beale) [212]	<p>Supports SA conclusion and objects to development in proximity to Chattenden Woods & Lodge Hill SSSI</p> <ul style="list-style-type: none"> Urges a strategic approach to protecting Chattenden Woods and Lodge Hill SSSI and its nationally important Nightingale population. Recommends a 400m buffer around the SSSI within which no net new residential units would be permitted. Supports the SA conclusion that new residential development, in particular Site HHH5 and SR14, could significantly affect the Nightingale population, in absence of more detail regarding the strategic environmental management plan. 	<ul style="list-style-type: none"> Comments noted. No specific response.

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30	Save the Hoo Peninsula [E.200]	<p>SA legal compliance</p> <ul style="list-style-type: none"> Believes the SA process has not met the legal requirements of the SEA Regulations, nor the NPPF requirement to ensure plan is <i>“informed by a sustainability appraisal... so that the likely effects... are fully understood”</i>. Reasonable alternatives not robustly assessed - SA Volume 2 records the “preferred approach” was essentially confirmed prior to final comparative analysis of spatial growth options. Alternatives were not developed and tested on equal footing Alternatives without large-scale Hoo Peninsula allocations ignored - Higher densities in urban/suburban Medway Towns not given equal assessment despite being realistic options under NPPF paragraphs 124– 128. Mitigation assumed but unproven - Especially for environmental impacts on European sites and infrastructure capacity. SA Volume 1 Table N.7.1 shows residual adverse effects on biodiversity, landscape, and soil quality even after mitigation. Absence of clear, funded mitigation. <p>Assessment of reasonable alternatives and justification for choices</p> <ul style="list-style-type: none"> The SA’s growth option testing indicates urban-led approaches score more favourably, but the plan opts for a rural expansion model. Urban intensification (Option 1) is not tested to the same spatial or site-specific depth as the chosen strategy (Option 3). The SA does not evidence why more sustainable options were rejected, with no transparent capacity testing. Omits key cumulative impacts including the Lower Thames Crossing, and combined recreational impacts from Swale, Gravesham and Dartford. Evidence within SA supports removal of Hoo Peninsula allocations and reallocation to urban areas with better infrastructure and lower environmental constraints. A lawful and sound plan would revisit the SA, model this approach at equal detail to rural allocations, and transparently compare environmental, social, and economic outcomes. 	<ul style="list-style-type: none"> The R19 SA Report has been prepared to meet the legal requirements of the SEA Regulations. Figure 2.3 of the R19 SA (Vol 2) summarises where each of the requirements of an ‘Environmental Report’ have been met. All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. Options were evaluated prior to the Council’s identification of preferred options. The reasons for selection and rejection presented in the SA are intended as outline summaries only and have been provided by the Council. The Council has sought to maximise urban / brownfield growth. The Council’s preferred spatial strategy (Spatial Growth Option 3 – Blended Strategy) includes maximised development in the urban area as per Option 1 (Urban Regeneration Focus). A large number of reasonable alternative sites have been evaluated in the SA (335 non- strategic and 24 strategic) demonstrating the Council’s exploration of available and reasonable options across the Plan area. The limitations of the high-level SA assessment are acknowledged (see section 4.6 of the R19 SA), including that the success of mitigation measures is uncertain. In line with the SEA Regulations, based on the available information at the time of assessment, residual effects of the Plan are identified following consideration of mitigation, and monitoring measures proposed.

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31	Taylor Wimpey & Persimmon Homes [E.143]	<p>Disputes site allocations under Policy SA4</p> <ul style="list-style-type: none"> • SMI6 Chatham Waters - Disputes allocation; tenancies are complex, and site provides existing employment that cannot easily be compensated. Believes no evidence shows site is deliverable. • Significant infrastructure requirements under Policy SA4 unresolved; may impact all sites. • High-cost items (e.g., flood defences) may lack funding; Persimmon notes gaps in Viability Appraisal. <p>Disputes reasons for rejection of Site RN1 Land at Mill Road, Gillingham</p> <ul style="list-style-type: none"> • Loss of BMV agricultural land; coalescence between settlements; and beyond reasonable walking distance to public transport. They believe benefits outweigh any loss; site is "<i>suitable, available and achievable</i>" and would contribute to housing delivery in next 5 years. 	<ul style="list-style-type: none"> • All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA. SA findings are fed back to the Council to aid their decision making and selection/rejection of options. The reasons for selection and rejection presented in the SA are intended as outline summaries only, and have been provided by the Council. • Site RN1 has been evaluated in the SA alongside other non- strategic reasonable alternative sites in Appendix G, using the same methodology as set out in Appendix E of the R19 SA (Vol 3). For relevant receptors, such as access to bus services and public or cycle access, the assessment considers the proportion of each site within recommended sustainable target distances, and negative scores are recorded where the majority of the site area lies outside of this distance.

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32	Telereal Securitised Property GP Limited [E.62]	<p>Support the Plan & allocation of Site CCB49</p> <ul style="list-style-type: none"> Support allocation of Site CCB49: Telephone Exchange, Best Street, Chatham, ME4 4AB but suggest a revised capacity of 50–100 homes (c.150 allocated). <p>Suggest revision to assessment against SA objectives:</p> <ul style="list-style-type: none"> Climate Change Adaptation – Should not be affected if appropriate flood risk and drainage strategies are in place. Biodiversity & Geodiversity - Sufficiently distanced from European sites and SSSI; any impacts likely mitigated at application stage. Landscape & Townscape - No significant constraints identified. Pollution & Waste - Propose air quality assessment to mitigate potential impact; small housing yield means risk is minimal. Assumes no adverse impact on air quality or pollution. Health & Wellbeing - Leisure centre more than 1.5km away, but Medway Park Sport Centre 600m away (within threshold); easily reachable by bike or foot. Pedestrian route via open space. Minor positive impact anticipated. Cultural Heritage - Potential minor negative impact on heritage assets. Can be mitigated through heritage- and design-led redevelopment or conversion approach. Transport & Accessibility - Council notes excellent location relative to public services. Economy & Employment - Slight adverse effect anticipated, but site currently underutilised. Mostly empty, with capacity for additional office use. 	<ul style="list-style-type: none"> All reasonable alternative sites have been evaluated in the SA using a consistent methodology against each SA Objective, pre-mitigation (see methodology within Appendix E (Vol 3) of the R19 SA, and evaluation of non-strategic sites in Appendix G). All reasonable alternative sites including CCB49 have also been evaluated post-mitigation (see Appendix I of the R19 SA) where points including those outlined by the respondent have been considered to improve the performance of the site. Should any amendments (e.g. capacity alterations) to sites evaluated in the Regulation 19 SA be identified by Medway Council these can be evaluated in the next SA output.
33	The Alliance of Hoo Peninsula Parishes [E.119]	<p>Reasonable alternatives</p> <ul style="list-style-type: none"> The SA fails to objectively assess reasonable alternatives, e.g. Hoo Peninsula strategic allocations were appraised after inclusion as preferred sites, contrary to the legal requirement for iterative and open testing. The SA presents site options and growth strategies without a consistent comparative framework. The SA accompanying the Plan: <ul style="list-style-type: none"> Does not demonstrate fair and equal testing of strategic alternatives. Fails to explain dismissal of a maximised vacant brownfield-led approach centred within the urban/suburban Medway Towns. 	<ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA on a comparable basis, with findings fed back to the Council to aid their decision making and selection/rejection of options. In accordance with the SEA Regulations, the SA report presents an outline of the reasons for selecting or rejecting alternatives. The SA provides a proportionate summary of the Council's rationale, rather than a detailed justification. Chapter 5 of the R19 SA (Vol 2) explains the approach to

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		<ul style="list-style-type: none"> Does not show how cumulative impacts on Hoo Peninsula were determinative in site selection. <p>SA assessments</p> <ul style="list-style-type: none"> The SA “<i>does not provide evidence of how environmental limits have influenced strategic choices</i>”, especially regarding: <ul style="list-style-type: none"> Water and wastewater infrastructure. Air quality impacts on internationally protected sites. Soil and land degradation. Transport capacity on the peninsula. 	<p>reasonable alternatives in the SA process, including the different types of alternatives considered. All reasonable alternatives were assessed against the SA Framework using the methodology set out in Chapter 2 of the R19 SA, with consistent evaluation between options of the same type (e.g., growth options, spatial delivery options, spatial growth options, strategic sites, non-strategic sites).</p> <ul style="list-style-type: none"> While it is acknowledged that specific environmental “limits” and thresholds play a crucial role in guiding development across various sustainability topics, it is important to note that the SA operates at a high-level, strategic scale (note the limitations of the SA in section 4.6 of the R19 SA). Many of the specific thresholds related to issues such as water and wastewater infrastructure, air quality impacts, soil and land degradation, and transport capacity will be explored and addressed in more detail at the project level, as these issues become more context specific. The SA has been informed by the best available evidence at the time of its preparation, with any evidence gaps clearly identified where relevant. For example, regarding water (see Table 15.1), the SA notes uncertainties around wastewater capacity due to the absence of specific data at this stage. Additionally, more detailed air quality modelling is currently being prepared to inform the Submission HRA, which will include a comprehensive evaluation of the plan's impacts, particularly in relation to critical levels and critical loads of air pollutants affecting protected sites.
34	The Independent Group [E.37]	<p>Objects to growth on Hoo Peninsula but supports evidence in SA report</p> <ul style="list-style-type: none"> Notes adverse effects on the habitats of Hoo Peninsula from the scale of development proposed, and uncertainty in the HRA conclusions. Believes the LPA's spatial strategy is “<i>irrational and is in clear conflict with the evidence base and supporting documentation</i>” given that the Interim HRA and R19 SA identify potential adverse effects from 	<ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA on a comparable basis, with findings fed back to the Council to aid their decision making and selection/rejection of options. This includes spatial growth options, as explained in section 5.5 of the R19 SA

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		growth allocated on the Hoo Peninsula.	(Vol 2), which also includes commentary from the Council regarding their outline reason for selection/rejection of options. The full evaluation of spatial growth options can be found in the R18 Interim SA, where Option 3 (Blended Strategy) was identified to offer the best balance of sustainability considerations.
35	The Kent SME Developers Network [E.49]	<p>Infrastructure pressure & growth options</p> <ul style="list-style-type: none"> SA (para 5.3.5) notes lower growth could reduce pressure on transport and social infrastructure, but SME suggest low growth option unlikely to effectively address existing infrastructure strain, reflected throughout Plan: ageing infrastructure, services/facilities not meeting community needs, pressure on local services. Pressure partly due to absence of plan-led, coordinated growth and infrastructure provision. Adoption of Plan vital to address this. <p>Growth options assessed in SA</p> <ul style="list-style-type: none"> Two options assessed: <ol style="list-style-type: none"> Meeting minimum local housing needs in full. Meeting minimum local housing needs + accommodating Gravesham's unmet need (2,000 homes). Council discounted GBC request due to lack of evidence demonstrating necessity; Respondent concludes it not justified. Plan should be reviewed once GBC Local Plan progresses, likely before Examination. Unclear if further consideration given to housing requirement above minimum needs to support growth ambitions (e.g., increased affordable housing, spreading infrastructure costs). Suggest preparing further evidence to explore this. 	<ul style="list-style-type: none"> The growth options have been evaluated in the SA, with the assessment narrative exploring the relative sustainability credentials of each. The lower option is generally expected to place less pressure on infrastructure than the higher option although similar overall effects are anticipated. The reasonable alternative growth options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making. As explained in section 5.3 of the R19 SA (Vol 2), the growth options were first identified at the R18 stage, and were updated at the R19 stage based on the most up to date information available to the Council at the time. Should any further evidence emerge, or any further reasonable alternatives be identified, it can be explored in the SA process.
36	Trenport Investments Limited [E.26]	<p>Support SA and allocation of Site SR51</p> <ul style="list-style-type: none"> Using the SA report as evidence, TIL believe that the land to the east and west of Church Street should be retained as a site allocation in the new Local Plan. 	<ul style="list-style-type: none"> Comments noted. No specific response.
37	Uniper [E.147]	<p>Supports employment land focus but requests further detail on MedwayOne site (HHH35 and HHH36)</p> <ul style="list-style-type: none"> Supports the plan's focus on delivering employment land, particularly through the re-use of existing brownfield allocations, which aligns with 	<ul style="list-style-type: none"> Comments noted. No specific response.

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		<p>the SA report.</p> <ul style="list-style-type: none"> Requests that Grain Power Station is explicitly recognised within Policy SA14 as a safeguarded Existing Employment Allocation. Believes the site has significant potential: <i>"It is in active energy and industrial use, and has scope for further intensification aligned with decarbonisation, logistics, and advanced manufacturing,"</i> and needs to be protected in the plan. 	
37	Veetee Rice [E.123]	<p>SA assessment of Sites SR30, SR31 and SR37</p> <ul style="list-style-type: none"> Suggest that Sites SR30, SR31 and SR37 together have the capacity to deliver approximately 1,000 dwellings, rather than the reduced capacities noted in the SA. Note that the sites received some minor negative impacts in the SA regarding flood risk, pollution and waste, and health and wellbeing. Suggest that Site 1 is not at risk of flooding; air and noise pollution compliance will be achieved at application stage; access to healthcare and leisure will be improved via the Frindsbury Opportunity Area Framework. 	<ul style="list-style-type: none"> All reasonable alternatives have been identified by Medway Council and evaluated in the SA based on the red line boundary and proposal information (including housing capacity) provided. All sites have been evaluated in the SA on a comparable basis using the same methodology and source of information provided by the council. Sites have been evaluated pre- and post-mitigation to provide transparency and consistent scoring. The methodology used can be found in Appendix E of the R19 SA (Vol 3).
38	Village Store [H.205]	<p>Object to Hoo Peninsula development</p> <ul style="list-style-type: none"> Critiques the plan for minimising development in urban areas, which are more sustainable and closer to existing infrastructure and transport links, while maximising development in the Hoo Peninsula, an unsustainable and sensitive location. States that development in the Hoo Peninsula must be minimised to reduce impacts on habitats and wildlife. Local Plan conflicts with legally adopted Neighbourhood Plan policies, particularly regarding infrastructure, landscape, community facilities, and housing. <p>Sustainability Appraisal Compliance</p> <ul style="list-style-type: none"> States that the SA fails to legally satisfy the SEA directive. Insufficient integration of the SA/SEA and the HRA. 	<ul style="list-style-type: none"> The R19 SA Report has been prepared to meet the legal requirements of the SEA Regulations. Figure 2.3 of the R19 SA (Vol 2) summarises where each of the requirements of an 'Environmental Report' have been met. At the time of preparing the R19 SA, the latest outputs of the HRA process were integrated (the Interim HRA). The Interim HRA declared uncertainty regarding air quality and recreational impacts where the evidence base was emerging. The findings of the final HRA will be taken into account in future SA outputs when available.
39	CPRE Kent	<p>Lack of justification for spatial strategy</p> <ul style="list-style-type: none"> Comment that the SA states that the worst performing spatial development option is the Hoo Peninsula, ranking lowest against a number of SA objectives (see table 5.5.4). And in terms of delivery, table N.5.6 of the SA executive summary shows a blended approach offers 	<ul style="list-style-type: none"> All reasonable alternatives and options have been identified by Medway Council as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options.

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		<p>best balance of sustainability considerations, however, two of the largest sites could not be expected to be completed by 2041 – LW8/Mill Fields (2,000 at Capstone Valley) and SM16/Chatham Docks.</p> <ul style="list-style-type: none"> From the SA (executive summary) it is said that no new information about the availability of sites located in town centres was reviewed. Presumably this was because there was no targeted brownfield land call for sites. 	<p>The Council's Land Availability Assessment (LAA) evidence was used to inform their identification of reasonable alternatives that were evaluated in the SA process. The latest available information was reviewed at the time of preparing the R19 SA.</p>
40	Esquire Developments [E.134]	<p>Reasonable alternative growth options</p> <ul style="list-style-type: none"> Feel there is no consideration to increasing housing delivery above minimum housing needs to either increase affordable housing delivery or spreading the cost of infrastructure over an increased number of homes. Recommend further work be completed to establish whether there is justification for a potential uplift in housing requirements in light of affordable housing needs and/or infrastructure needs (and costs). If there is justification, this should be tested through the SA as a reasonable alternative growth option. 	<ul style="list-style-type: none"> All reasonable alternatives and options identified by Medway Council have been evaluated in the SA process, taking into account options that are deemed realistic given Medway's constraints. This includes two growth options at the R18 stage, which were updated at the R19 stage to reflect the latest housing need evidence. At both stages, consideration was given to exceeding the minimum housing need, and the benefits / challenges of this approach were explored in the SA assessments.
41	ArcelorMittal Kent Wire [E.154]	<p>Assessment of reasonable alternatives</p> <ul style="list-style-type: none"> Suggest that despite R18 submissions, the SA still fails to properly consider the alternatives to the redevelopment of Chatham Docks for residential led development. <i>"...there is no evidence in the Sustainability Appraisal of any more than superficial consideration, with no real assessment of the impact of the proposed reallocation of Chatham Docks. There are no reasoned conclusions for the redevelopment of Chatham Docks away from strategically significant steel manufacturing. The identification of Chatham Docks as an indicative residential-led development site is not explained"</i>. Feel that the Council has not addressed the docks' unique location, the impacts of redeveloping them for housing, or viable alternatives such as the SPPARC Masterplan 2022. The draft Local Plan inadequately assesses the loss of the South East's last non-tidal dock, failing to consider effects on the construction industry, carbon emissions, and skilled jobs. It also lacks any sustainability or net impact analysis comparing the loss of ArcelorMittal Kent Wire with a housing-led and 	<ul style="list-style-type: none"> Representations made regarding the SA at the Regulation 18 stage were responded to in the R19 SA (see Appendix C, Volume 3). SA/SEA operates at a strategic level and does not include detailed analysis of individual site impacts. The detailed implications of any redevelopment, including potential impacts on existing operations such as steel manufacturing and the associated economic, carbon, and employment effects, would be expected to be assessed more fully at the planning application stage, when proposals are brought forward in more detail. Some 27 strategic and 335 non-strategic reasonable alternative sites have been identified by Medway Council as the Plan makers and evaluated in the SA process, with findings fed back to the Council to aid their decision making and selection/rejection of options. The inclusion of Chatham Docks as a preferred residential-led mixed use site forms part of this strategic assessment process

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		light industrial redevelopment.	and reflects wider planning considerations, including the need to meet housing and employment needs sustainably.
42	Tonbridge and Malling Borough Council	Support for the spatial strategy <ul style="list-style-type: none"> Tonbridge and Malling Borough Council supports the spatial strategy and consider that it complies with the NPPF 2024 in all aspects, being positively prepared, justified, effective and consistent with national policy. Comment that the Local Plan “<i>avoids the allocation of sites assessed in the council’s Land Availability Assessment and Sustainability Appraisal as unsuitable, including site CHR4 north of Snodland and west of Halling, due to factors including the potential coalescence between settlements</i>”. 	<ul style="list-style-type: none"> Comments noted. No specific response.

Habitats Regulation Assessment

Comments related to HRA and responses

Developers and Agents

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
1	AC Goatham & Son [E.372]	No mention of HRA.	n/a
2	Gleeson Land [E.118]	<p>This representation promotes non greenbelt sites for inclusion in the Local Plan and in particular the inclusion of Land east of Buckland Road, Cliffe.</p> <p>This representation includes information for a project level HRA for the site known as Land east of Buckland Road, Cliffe.</p>	<p>Information provided does not change the findings of the HRA process as undertaken for the scale for the Local Plan.</p> <p>It is noted that the project level HRA refers to the Arup 2018 HRA rather than the Interim HRA prepared in support of the Local Plan Regulation 19 consultation.</p> <p>The information provided for the site known as Land east of Buckland Road, Cliffe would support a project level HRA alongside a planning application.</p>
3	Catesby Strategic Land Limited (Land East of Stoke Road) [E.122]	417. A draft Habitats Regulation Assessment has been provided with the Regulation 19 Consultation Local Plan evidence base. Catesby consider the contents of the draft HRA acceptable at this time.	No comment required.

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
4	Taylor Wimpey & Persimmon Homes [E.143]	<p>2.1.3. At the time of publication of the Regulation 19 Plan, the following evidence documents, which are fundamental to the preparation of the Plan (and cannot be considered as anything other than “proposed submission documents”) are missing:</p> <p>Air Quality Assessment which also underpins the Habitats Regulation Assessment (HRA) which is not in its final form; Final Habitats Regulation Assessment; and Completed Duty to Cooperate Report. Para 1.4.4 of the Local Plan confirms this is still being completed and is intended to be submitted with the Local Plan for examination.</p> <p>2.2.1. In not making these documents available with the consultation Local Plan for review and comment, the Council has failed in its statutory duty in this regard. In particular the absence of the Air Quality Assessment is fundamental to the HRA and determining whether the spatial strategy put forward in the Local Plan is likely to have a significant effect on European designated sites, of which there are several in Medway. The missing documentation is to be made available and re-consulted upon prior to the Plan proceeding to examination.</p>	<p>The Habitats Regulations [at Regulation 105] states that ‘the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives’.</p> <p>Air quality modelling work is currently in preparation which will inform the Final HRA. In addition, more details on the Strategic Environmental Programme are being worked up which will inform the Final HRA. The Final HRA Report will be published prior to submission of the Local Plan and will be consulted on with Natural England (the appropriate nature conservation body). This will enable the Council to fulfil its duty under the Habitats Regulations in this respect.</p>
5	Uniper [E.147]	3.13. Prioritising brownfield allocations before releasing new greenfield sites (particularly those with extant planning permissions such as MedwayOne), represents the most sustainable and deliverable strategy for the future growth of Medway across the Plan period. This strategy also aligns with the recommendation within the Sustainability Appraisal Report (2025) and Interim Habitats Regulations Assessment, which caution against the premature release of greenfield land on the Hoo Peninsula due to landscape, biodiversity and infrastructure sensitivities.	No comment required
6	Taylor Wimpey [E.182]	It is noted that the draft Habitat Regulations Assessment is in an interim form at present and we would support the Council's completion of this crucial work prior to Plan submission in consultation with stakeholders - the statutory agencies, wildlife groups and bodies, local communities and developers.	Noted. No comment required.

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
7	Catesby Strategic Land (Lower Rainham Road) [E.190]	<p>Draft Policy S3: North Kent Estuary and Marshes designated sites - Comments</p> <p>5.15. This policy proposes that 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 or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England.</p> <p>5.16. Both Land South of Lower Rainham Road and the draft site allocation Rainham Parkside Village (SA10), are located within this zone of influence. Catesby considers that the tariff could have impacts for the viability of large scale development within the zone of influence. There is also the added complexity that Rainham Parkside Village is proposed to be delivered by a consortium of SME housebuilders. Therefore, the impact of this tariff and the level set should be subject to sensitivity testing within the viability assessment to ensure the inclusion of the tariff does not impact the delivery of development.</p>	The tariff contribution towards Birdwise is required for all new development as set out in Policy S3. No further comment required.
8	Trenport Investments Limited [E.26]	No HRA related comments included in response.	No comment required
9	St Johns College [E.82]	<p>Comments in relation to Policy S3 as follows:</p> <p>There are two particular sections of the proposed Policy which do not meet the tests of soundness in that they are imprecise, ambiguous and extremely subjective and so are not effective.</p> <p>Firstly, the requirement that 'adjacent land parcels of land' to development sites (including allocated sites), which could include third party land (land outside the ownership or control of the applicant, landowner or developer of the development site) are surveyed is unrealistic and therefore unreasonable.</p> <p>If such a policy criterion is not deliverable, it cannot be effective. Rights of access to land outside of ownership or control do not exist for developers. It is therefore entirely unrealistic to introduce a requirement that land outside of ownership is accessed and surveyed as part of planning/development work.</p> <p>An applicant may be able to choose to or negotiate with an adjacent</p>	<p>This type of limitation [i.e. no access to third party land] is occasionally encountered during ecology surveys. Where landowner permission is not possible other means of assessing the potential of adjacent land for birds/habitats/invertebrates can be negotiated with the Council and in agreement with Natural England such as use of desk top information.</p> <p>The wording of Policy S3 refers specifically to the SSSI IRZ ' <i>Development with potential for urbanisation effects which are located in close proximity to both designated sites and/or functionally linked land, identified through reference to the Impact Risk Zone consultation area should</i>'</p>

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		<p>landowner to prepare such information, but the delivery of development cannot be reliant on such negotiations being successful. The policy is therefore not effective and does not meet the tests of soundness.</p> <p>Additionally, the policy requirement that <i>'all applications for development at the allocations set out should be accompanied with detailed noise assessments and lighting strategies...'</i> is considered to be overly restrictive, onerous and not justified. It therefore fails the test of soundness set out in the National Planning Policy Framework (NPPF). It is suggested that the wording of the Policy is altered to provide a cross-reference to proposed Policy DM4, which provides a more flexible and reasonable policy requirement.</p> <p>Moreover, the Policy as worded does not make clear whether supporting noise and lighting strategies are solely required for sites within the Zone of Influence or if the Policy relates to all allocations, whether within or outside the Zone of Influence.</p> <p>This adds further ambiguity and a lack of clarity about what the requirement relates to. As such, the Policy as worded is ineffective and unsound.</p> <p>In addition, attention is drawn to the fact that the Policy includes reference to 'larger schemes outside of the 6km Zone of Influence', which may be required to provide appropriate levels of avoidance or mitigation against harm to the designated sites and habitats. However, the Policy and its supporting explanatory paragraphs does not provide any definition of what 'project level applications' and a 'larger site' is. This evidently provides an ambiguous, uncertain and subjective policy which does not meet the National Planning Policy Framework (NPPF) tests of soundness- specifically it is not effective.</p> <p>It is accepted that there may be cases in which development proposals outside the designated Zone of Influence may have a detrimental impact upon it. However, the wording of the Policy as drafted does not meet the tests of soundness set out in the NPPF. It is suggested that this wording is removed from the Policy and included as supporting text to the Policy instead.</p>	<p>Sites outside the 6km Zone will be defined on a case-by-case basis by the Council in consultation with Natural England. This is common practice for similar mitigation strategies across the UK.</p>

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
10	Esquire Developments (Rainham Parkside Village) [E.134]	No HRA related comments	No comment required
11	Mrs Gillian Mulloy [E.1601]	<p>The Plan is considered incomplete and possibly insufficient to prove it is “positively prepared,” “justified,” and “effective” as required by the NPPF. Relying on an interim Habitat Regulations Assessment (HRA), pending air quality assessments at a crucial stage weakens confidence in the Plan’s evidence base. Lack of clear evidence showing how consultation feedback has influenced Plan changes, inadequate assessment of all potential sites and alternatives. Interim HRA before completing a full air quality assessment risks breaching the Conservation of Habitats and Species Regulations 2017; requires Appropriate Assessment before Plan submission. Lacks coordination between authorities to manage cross- boundary environmental impacts effectively.</p> <p>Change suggested by respondent:</p> <p>Completion of Environmental Assessments Prior to Submission</p> <p>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 2017 (as amended)</p>	<p>We recognise there is difference between the tests of soundness at examination as set out in the NPPF and legal compliance with the Habitats Regulations. HRA is a separate legal requirement to the tests of soundness and is used to assess the potential impact of a plan on European-protected sites and ensures that Natural England is consulted during the process. Both the tests of soundness and the HRA processes are distinct but are part of the overall planning and assessment framework, with the soundness tests focusing on the plan's overall viability and the HRA specifically on the impact on nature conservation sites. It is important to recognise that the HRA process has been undertaken throughout and alongside the plan making process and consulted on at all stages. An interim HRA was issued and consulted upon at Regulation 19. The final HRA will be prepared at submission for the examination.</p>

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		<p>and to demonstrate that environmental impacts have been thoroughly assessed and adequately mitigated before Plan submission.</p> <p>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.</p>	<p>The Habitats Regulations [Regulation 105] states that 'the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives'.</p> <p>Air quality modelling work is currently in preparation which will inform the Final HRA. In addition, more details on the Strategic Environmental Programme are being worked up which will inform the Final HRA.</p> <p>The Final HRA Report will be published prior to submission of the Local Plan and will be consulted on with Natural England (the appropriate nature conservation body). This will enable the Council to fulfil its duty under the Habitats Regulations in this respect.</p> <p>The council is required to undertake consultation on the Local Plan and show how this has been taken on board. The SA Report indicates how the SA process has influenced the Local Plan.</p>

Statutory Bodies

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
12	Natural England [E.148]	<p>Plan wide comments:</p> <p>Natural England raises concerns regarding progress of the Strategic Environmental Programme.</p> <p>Whilst Natural England is hopeful that a package of avoidance and mitigation measures can be agreed, it does not feel certain that this is achievable nor the timeframe for it being secured at present. Given this, and in the absence of detailed policy wording or an agreed strategic approach to avoiding or fully mitigating direct and indirect impacts to the Chattenden Woods and Lodge Hill SSSI and the Medway Estuary and Marshes SSSI, SPA and Ramsar site at this stage, Natural England is concerned that the Plan is currently unsound.</p> <p>Natural England provide suggested wording edits to Policies S2 and</p> <p>S3. Policy SA10: Lower Rainham</p> <p>Natural England is concerned that Policy SA10 refers to the potential need for compensation measures following a project level Habitats Regulations Assessment. Suggested wording provided.</p> <p>Habitats Regulations Assessment specific comments:</p> <p>Natural England expresses concern over the timing of the Hoo Peninsula Strategic Environmental Programme.</p> <p>Whilst Natural England welcomes the reference to the enhanced SAMMS provision within the HRA, it does not appear to be reflected within the Policy wording. For completeness, and to ensure impacts do not result, we recommend the Policy S3 wording is amended along the lines of our suggestions above.</p> <p>The section on urbanisation effects of the HRA appears to focus primarily on the urbanisation effects of development allocations to the designated</p>	<p>The Strategic Environmental Programme is in preparation. It will be considered in the Final HRA which will be completed prior to submission of the Local Plan.</p> <p>Agree with suggested wording</p> <p>Agree with suggested wording</p> <p>The Strategic Environmental Programme is in preparation. It will be considered in the Final HRA which will be completed prior to submission of the Local Plan.</p> <p>Noted and agreed.</p> <p>In order to avoid loss of FLL, Policy S3 requires bird</p>

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		<p>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 appear to form part of the supporting documents or evidence base to the Plan making it difficult to understand the conclusions within the interim HRA.</p> <p>Whilst Natural England concurs that mitigation measures for urbanising effects such as noise, lighting, dust and drainage are widely used and can generally be effective (Section 8.3.17 of the HRA), direct loss of functionally linked land will require bespoke mitigation. Given this, we advise that there should be a high degree of certainty at this stage that the allocations will not result in significant impacts to functionally linked land. We will be pleased to continue working with the Council on the HRA as further information becomes available.</p>	<p>surveys to inform mitigation requirements. One of the original aims of the CEclA was to identify FLL associated with the North Kent Marshes European site designations on the Hoo Peninsula through bird surveys. We appreciate that this has not been done through bird survey work, with the CEclA instead focusing on a desk-based review of records. The CEclA does not reach a conclusion regarding FLL outside the designation boundaries. Although it does note that land in the RSPB reserves is FLL. We have therefore previously recommended that bird surveys be undertaken on the peninsula to define areas of FLL with confidence. In the absence of these surveys and in accordance with the CEclA we have taken a precautionary approach which assumes that FLL is associated with areas of grazing marsh habitat on the Hoo Peninsula and any other area of open grassland or arable land adjacent to the designations and RSPB reserves.</p>
13	Environment Agency [E.68]	<p>For Hoo Peninsula Strategic Environmental Programme – and specifically the Hoo</p> <p>, as outlined in Policy S2, should be noted that this is an area of potential coastal change, where setback flood defences to provide coastal squeeze intertidal habitat compensation (as outlined by the MEAS strategy - 2019), and areas of 'No Active Intervention' where Environment Agency maintenance of coastal defences may be withdrawn from around 2040. This is also referenced in the Interim Habitats Regulations Assessment (7.2.18). For this policy, it's essential that the Environment Agency is part of the partnership discussions to establish as strategic environmental programme on the Hoo Peninsula.</p>	Noted

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14	Homes England (Chattenden Barracks) [E.176]	<p>Homes England is keen to understand updates in respect of the SEMS and would like to be included as one of the stakeholders.</p> <p>Homes England is undertaking exploratory work relating to the future of land to the north of the Lodge Hill asset to ascertain what wider environmental benefit could be generated (beyond its statutory management obligations). Given the interim nature of the HRA and uncertainty in approach within the Plan, Homes England is not committing any land to SEMS at this stage. Further clarity is needed on what SEMS is seeking to achieve in the context of wider development on the Hoo Peninsula and how SEMS is being incorporated within a longer term (implementable) Hoo Peninsula Environmental Framework.</p>	Noted. The details of the Strategic Environmental Programme will be presented in the Final HRA prior to submission.
15	Village Store [H.205]	<p>The response states that the Local Plan is unsound for a number of reasons including</p> <ul style="list-style-type: none"> - Insufficient integration of the SEA and HRA. The SA fails to legally satisfy the SEA Directive and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle. 	The precautionary principle should be applied when undertaking the integrity test. This is outlined in the Interim HRA methodology. Further clarity / detail is sought on this response to understand how the HRA process has failed to apply the precautionary principle. This point can be addressed in the Final HRA which will be prepared prior to submission.

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16	Kent Wildlife Trust [E.67]	<p>The supporting Habitats Regulations Assessment and Sustainability Appraisal do not provide sufficient reassurance that irreversible impacts from the volume of development proposed will be avoided.</p> <p>Of particular concern are the impacts from habitat fragmentation, recreational disturbance, increased domestic pet predation and pollution from noise, lighting and air quality issues because of sites allocated in Capstone Valley, Hoo St Werburgh and Chattenden, and on land west of Strood. With respect to these sites and the supporting Habitats Regulations Assessment and Sustainability Appraisal it is unclear how site selection within the draft Local Plan has followed the mitigation hierarchy. Concerns are raised that the approach taken in selecting sites has been to leave the resolution of all impacts of development to the application stage.</p> <p>The Wildlife Trust raise concerns that details around the strategic environmental management plan have not been established to provide certainty in respect of mitigation.</p>	<p>Noted. The details of the Strategic Environmental Programme will be presented in the Final HRA prior to submission.</p>
17	RSPB England (Mr Joseph Beale) [E.212]	<p>The RSPB considers that Bird Wise SAMMS reflects the current best available evidence on how to address in combination impacts from recreational disturbance from increased residential development close to coastal SPA/Ramsar/SSSI. For sites that may have an impact on these sites on their own due to proximity or size it is important that they may need to deliver additional bespoke mitigation plus the SAMMS contribution. There is a need to better understand functionally linked land and how this network of sites support the SPA. The findings of the SPA Review should be referenced in policy. Site SR51 is of concern.</p>	<p>In order to avoid loss of FLL, Policy S3 requires bird surveys to inform mitigation requirements. Lepus has previously recommended that bird surveys of all allocations be undertaken to inform the HRA process and define the presence / absence of FLL at allocations themselves and surrounding land on the peninsular. A desk-based assessment of FLL was taken forward in the CEclA. It is noted however that the CEclA does not form part of the evidence base and therefore it is difficult to draw on this data in the HRA.</p>

Political and Remaining Vol Community Groups

Rep no.	Respondent	Summary of comments related to HRA	HRA response to Medway Council
18	The Alliance of Hoo Peninsula Parishes Rep [E.119]	Concerns are raised over the interim nature of the HRA.	<p>The Habitats Regulations [Regulation 105] states that ‘the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives’.</p> <p>Air quality modelling work is currently in preparation which will inform the Final HRA. In addition, more details on the Strategic Environmental Programme are being worked up which will inform the Final HRA.</p> <p>The Final HRA Report will be published prior to submission of the Local Plan and will be consulted on with Natural England (the appropriate nature conservation body). This will enable the Council to fulfil its duty under the Habitats Regulations in this respect.</p>
19	Higham Parish Council Rep [E.211]	As above	As above
20	The Independent Group [E.37]	As above	As above
21	High Halstow and St Mary Hoo Parish Councils [E.117]	As above	As above
22	Save The Hoo Peninsula Campaign [E.200]	As above	As above

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23	Pump Lane Steering Group Add column [E.208]	No HRA related comments	No comment required
24	Friends of Deangate Ridge Committee [E.127]	There is insufficient integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.	As above
25	Friends of the North Kent Marshes [H.82]	Concerns are raised over the interim nature of the HRA.	<p>The Habitats Regulations [Regulation 105] states that 'the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives'.</p> <p>Air quality modelling work is currently in preparation which will inform the Final HRA. In addition, more details on the Strategic Environmental Programme are being worked up which will inform the Final HRA.</p> <p>The Final HRA Report will be published prior to submission of the Local Plan and will be consulted on with Natural England (the appropriate nature conservation body). This will enable the Council to fulfil its duty under the Habitats Regulations in this respect.</p>

Others

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26	<p>Bellway Strategic Land (Mierscourt Road) [E.166]</p> <p>Bellway Strategic Land (Bellway Strategic Land South of Moor Street, Phase 1) [E.167]</p> <p>Bellway Strategic Land (Bellway Strategic Land South of Moor Street, Phase 1 and 2) [E.168]</p>	Concerns are raised over the interim nature of the HRA.	<p>The Habitats Regulations [Regulation 105] states that 'the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives'.</p> <p>Air quality modelling work is currently in preparation which will inform the Final HRA. In addition, more details on the Strategic Environmental Programme are being worked up which will inform the Final HRA.</p> <p>The Final HRA Report will be published prior to submission of the Local Plan and will be consulted on with Natural England (the appropriate nature conservation body). This will enable the Council to fulfil its duty under the Habitats Regulations in this respect.</p>