

Please contact: Catherine Smith  
Our ref: Medway LP  
Your ref:  
Date: 18 December 2025



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Dear Sir/Madam

**Submission of Medway Local Plan for Examination – Section 22 Town and Country Planning (Local Planning) (England) Regulations 2012**

I am pleased to advise you of the Submission of our Draft Medway Local Plan for Examination. This is in accordance with our Service Level Agreement with the Planning Inspectorate.

We have provided electronic copies of the prescribed Submission documents and supporting information.

We have commissioned a Programme Officer, Louise St John, who is supporting us in preparing for the examination process.

We have set up an examination website following the guidance provided by the Planning Inspectorate, which is available to view today.

We have welcomed the advice provided by the Inspectorate through Advisory Visits, and the Pre-examination checklist. We have outlined our response to the matters raised in Annex 1 to this letter.

We consider that we have the steps and processes in place to support the examination of our draft Local Plan.

We have provided details of the representations made on the Draft Plan, and have identified a range of matters that are likely to be key issues at examination. These include the proposed spatial strategy and specific site allocations and the ability to meet housing needs through sustainable development with effective mitigation. Representations on these matters have been made by both promoters of development and objectors to proposed allocations.

Representations have been made on the Duty to Cooperate. There is support from neighbouring local planning authorities. Wider parties have queried engagement on cross border site allocations, with Gravesham, Maidstone and Tonbridge and Malling Borough

**This information is available in other formats and languages from  
Catherine Smith on 01634 331358.**

Councils. Some statutory consultees have raised issues of soundness. There has been further discussion with Natural England and the Environment Agency on key matters. We anticipate further discussion of assessing and mitigation of environmental impacts arising from the plan.

We anticipate further examination on housing delivery, the plan period and five year housing land supply.

Many comments relate to infrastructure delivery to mitigate the impacts of planned development. The scale of investment needed is significant, and strategic mitigations are required in transport and flood defences to facilitate the delivery of the plan. This has led the Council to propose a stepped trajectory across the plan period. Strategic infrastructure including transport capacity and the plan's strategy is anticipated to be a key matter. Linked to this will be discussion on viability and developer contributions.

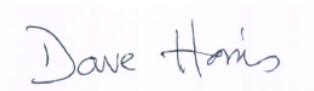
Green Belt will be a key matter for examination, with regard to sites west of Strood and in the Medway Valley.

Provision for Gypsy and Traveller accommodation is also likely to be a key matter.

76 respondents have indicated that they wish to participate in the examination. We will be guided by the Inspector on the appropriate time allocation for hearing sessions.

We look forward to hearing from our appointed Inspector in due course and further advice on the examination of our plan.

Yours faithfully

A handwritten signature in blue ink that reads "Dave Harris". The signature is written in a cursive style with a light blue background behind it.

Dave Harris  
Chief Planning Officer  
Planning Service

**How the Council has addressed the Inspectorate's response to the Pre-examination checklist****Duty to Cooperate Statement**

The Council has prepared an updated Duty to Cooperate Report. This has taken account of matters raised in representations on the Pre Submission Draft Local Plan and updated Statements of Common Ground with prescribed bodies. The updated report is submitted with the Draft Plan for examination.

**Statements of Common Ground**

The Council has prepared updated Statements of Common Ground with prescribed bodies. These include reference to the ongoing engagement with National Highways, Natural England, and the Environment Agency since the publication of the Pre-Submission Draft Plan. These form a finalised composite and individual Statements of Common Ground and are submitted with the Draft Plan for examination.

**Habitats Regulation Assessment and Natural England**

In agreement with Natural England, the Council has undertaken further work on potential air quality impacts on the Special Protection Areas, Ramsar sites and Special Areas of Conservation that have been scoped into the assessment of the plan. The technical reports and an updated Habitats Regulation Assessment have been produced and have been submitted with the draft Plan for examination. In Duty to Cooperate engagement with Natural England, proposed modifications to policy wording have been identified. The Council notes this as an agreed matter in the updated Statement of Common Ground.

**Strategic road network and National Highways**

The Council has continued to engage with National Highways since the publication of the Pre Submission Draft Plan. The Council has commissioned additional transport evidence to respond to the comments made in the representations from National Highways. The Council has agreed an updated Statement of Common Ground with National Highways and has provided the additional transport information with the examination materials.

**Superseded policies in the adopted development plan**

A schedule of the superseded policies is attached at Annex 2, and the Council asks that this be considered as a modification to the plan.

**Consultation Statement**

The Council has prepared a Regulation 22 Consultation Statement which is submitted with the materials for examination.

## **Housing land supply**

The Council has prepared a Housing Delivery Topic Paper which is submitted with the materials for examination.

## **Gypsy and traveller accommodation**

The Council has prepared a Gypsy and Traveller Accommodation Topic Paper which is submitted with the materials for examination.

## **Main town centre uses**

The Council has prepared a Main town centre uses Topic Paper which is submitted with the materials for examination.

## **Site selection methodology**

The Council has prepared a Site Selection Topic Paper which is submitted with the materials for examination.

## **Green Belt**

The Council has prepared a Green Belt Exceptional Circumstances Topic Paper which is submitted with the materials for examination.

## **Flood Risk**

The Council has prepared an updated Strategic Flood Risk Assessment (SFRA), in consultation with the Environment Agency to take account of updated modelling, which was not available at the time of the SFRA preparation. The Council has continued to engage with the Environment Agency on this matter and has produced an updated Statement of Common Ground. The Council has also produced a Site-Specific Flood Risk Topic Paper to clarify matters raised in representations from the Environment Agency. These documents are submitted with the materials for examination.

### List of superseded policies in the adopted development plan

In accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Local Plan contains the policies in the adopted development plan that will be superseded upon adoption of this Plan.

The policies listed in Appendix A are saved policies from the Medway Local Plan 2003. These will cease to have effect when this Local Plan is adopted. The list of saved policies identified in Appendix A, reflects the outcome of a compliance check undertaken following the 2023 amendments to the National Planning Policy Framework (NPPF). As part of this review, all saved policies from the adopted Medway Local Plan 2003 were assessed against the updated NPPF to determine their continued relevance and consistency. Policies deemed fully compliant or partially compliant with national policy have been carried forward as saved policies and remain in effect until the adoption of this Local Plan.

Current planning policy concerning minerals development in Medway is set out in the saved policies of the following plans:

- Kent Minerals Local Plan: Brickearth (1986)
- Kent Minerals Local Plan Construction Aggregates (1993)
- Kent Minerals Local Plan Chalk and Clay (1997)
- Kent Minerals Local Plan Oil and Gas (1997)

All of these plans were prepared by Kent County Council (KCC) prior to the formation of Medway Council and these plans therefore cover areas which are now within Medway. It is Medway Council's intention to replace all the previously adopted minerals planning policies with policies in the new Medway Local Plan 2041.

The Secretary of State for the Government Office for the South East wrote separately to both KCC and Medway Council on 21 September 2007 providing a direction on the policies in the previously adopted minerals and waste plans. Any policies not listed by the Secretary of State expired and those listed in the Direction are known as the 'saved policies'. It is the saved policies that will be deleted by the Medway Local Plan once adopted.

KCC and Medway Council received separate letters of direction from the Secretary of State and therefore the deletion of saved policies by KCC resulting from its adoption of replacement policies in 2016 and 2020 had no effect on Medway Council's saved policies.

This proposed modification ensures clarity and provides compliance with Regulation 8(5) by explicitly stating which policies will no longer form part of the development plan.

## List of Saved 2003 Medway Local Plan Policies to be Superseded

Medway Local Plan 2003 Saved Policy Number and Name
<b>S1</b> Development Strategy
<b>S2</b> Strategic Principles
<b>S4</b> Landscape and Urban Design
<b>S5</b> Medway's City Centre
<b>S6</b> Planning Obligations
<b>S7</b> Rochester Riverside Action Area
<b>S8</b> Chatham Maritime
<b>S9</b> Chatham Historic Dockyard
<b>S10</b> Strood Waterfront Action Area
<b>S12</b> Kingsnorth
<b>S13</b> Isle of Grain
<b>BNE1</b> General Principles for Built Development
<b>BNE2</b> Amenity Protection
<b>BNE4</b> Energy Efficiency
<b>BNE5</b> Lighting
<b>BNE7</b> Access for All
<b>BNE8</b> Security and Personal Safety
<b>BNE9</b> Design of Commercial Frontages
<b>BNE10</b> Advertisements
<b>BNE11</b> Hoardings
<b>BNE12</b> Conservation Areas
<b>BNE13</b> Demolition in Conservation Areas
<b>BNE14</b> Development in Conservation Areas
<b>BNE15</b> Advertisements within Conservation Areas
<b>BNE16</b> Demolition of Listed Buildings
<b>BNE17</b> Alterations to Listed Buildings
<b>BNE18</b> Setting of Listed Buildings
<b>BNE19</b> Advertisements on Listed Buildings
<b>BNE20</b> Scheduled Ancient Monuments
<b>BNE21</b> Archaeological Sites

<b>Medway Local Plan 2003 Saved Policy Number and Name</b>
<b>BNE22</b> Environmental Enhancement
<b>BNE23</b> Contaminated Land
<b>BNE24</b> Air Quality
<b>BNE27</b> Re-Use of Buildings in The Countryside
<b>BNE28</b> Farm Diversification
<b>BNE29</b> Farm Shops
<b>BNE30</b> Metropolitan Green Belt
<b>BNE31</b> Strategic Gap
<b>BNE32</b> Areas of Outstanding Natural Beauty
<b>BNE35</b> International and National Nature Conservation Sites
<b>BNE36</b> Strategic and Local Nature Conservation Sites
<b>BNE37</b> Wildlife Habitats
<b>BNE38</b> Wildlife Corridors
<b>BNE39</b> Protected Species
<b>BNE40</b> Cliffe Conservation Park
<b>BNE41</b> Tree Preservation Orders
<b>BNE42</b> Hedgerow Retention
<b>BNE44</b> Community Woodlands
<b>BNE45</b> Undeveloped Coast
<b>BNE46</b> Developed Coast
<b>BNE49</b> Agricultural Dwellings
<b>BNE50</b> Agricultural Occupancy
<b>ED2</b> Employment in Action Actions and Mixed Used Areas
<b>ED3</b> Other Employment Sites
<b>ED7</b> Special Industrial Areas
<b>ED8</b> Industrial Uses Not in A Use Class
<b>ED9</b> Chatham Port
<b>ED10</b> Working from Home
<b>ED11</b> Existing Tourist Facilities
<b>ED12</b> New Tourist Facilities
<b>ED13</b> Hotels
<b>ED14</b> Bed & Breakfast Accommodation and Guest Hotels
<b>ED15</b> Self Catering Accommodation

<b>Medway Local Plan 2003 Saved Policy Number and Name</b>
<b>ED16</b> Tourist Facilities for Walkers and Cyclists
<b>H2</b> Retention of Housing
<b>H3</b> Affordable Housing
<b>H4</b> Housing in Urban Areas
<b>H6</b> Flat Conversions
<b>H7</b> Multiple Occupation
<b>H8</b> Residential Institutions
<b>H9</b> Backland and Tandem Development
<b>H10</b> Housing Mix
<b>H11</b> Residential Development in Rural Settlements
<b>H12</b> Mobile Home Parks
<b>R1</b> Chatham – Comparison Retailing
<b>R2</b> Chatham – Convenience Retailing
<b>R3</b> Chatham – The Brook and High Street
<b>R4</b> Retailing in Strood
<b>R5</b> Retailing in Gillingham
<b>R6</b> Retailing in Rainham
<b>R8</b> Rochester City Centre
<b>R9</b> Retail Provision in New Residential Developments
<b>R10</b> Local Centres, Village Shops and Neighbourhood Centres
<b>R11</b> Town Centre Uses and the Sequential Approach
<b>R12</b> Mixed Use Schemes
<b>R13</b> Retail Uses and the Sequential Approach
<b>R14</b> Ancillary Retail Development
<b>R15</b> Amusement Arcades, Etc.
<b>R16</b> Restrictions on Goods For Sale
<b>R17</b> A2 and A3 Uses and Change of Use
<b>R18</b> Takeaway Hot Food Shops, Restaurants, Café, Bars and Public Houses
<b>R19</b> Vehicle Sales and Showrooms
<b>L1</b> Existing Leisure Facilities
<b>L2</b> New Leisure Facilities
<b>L3</b> Protection of Open Space

<b>Medway Local Plan 2003 Saved Policy Number and Name</b>
<b>L4</b> Provision of Open Space in New Residential Developments
<b>L5</b> Open Space in Employment Areas
<b>L6</b> Open Space Allocations
<b>L7</b> New Playing Fields
<b>L8</b> Dual Use of Recreational Facilities
<b>L9</b> Country Parks
<b>L10</b> Public Rights of Way
<b>L11</b> Riverside Path and Cycleway
<b>L13</b> Water Based Leisure
<b>T1</b> Impact of Development
<b>T2</b> Access to the Highway
<b>T3</b> Provision of Pedestrians
<b>T4</b> Cycle Facilities
<b>T5</b> Bus Preference Measures
<b>T6</b> Provision of Public Transport
<b>T7</b> The Rail Network
<b>T9</b> River Buses and Piers
<b>T10</b> Wharves
<b>T12</b> Traffic Management
<b>T13</b> Vehicle Parking Standards
<b>T14</b> Travel Plans
<b>T15</b> Parking Strategy
<b>T18</b> New Transport Infrastructure
<b>T19</b> Road Schemes
<b>T20</b> Development Related Road Schemes
<b>T21</b> Motorway Service Areas
<b>T22</b> Provision for People with Disabilities
<b>T23</b> Aviation Related Development
<b>CF1</b> Community Facilities
<b>CF2</b> New Community Facilities
<b>CF3</b> Sites for Local Healthcare Facilities
<b>CF4</b> Primary Healthcare Facilities
<b>CF5</b> Nursing and Social Care

Medway Local Plan 2003 Saved Policy Number and Name
<b>CF6</b> Primary Schools
<b>CF7</b> Further, Higher and Adult Education
<b>CF8</b> Cemetery Extension
<b>CF10</b> Overhead Supply Lines
<b>CF11</b> Renewable Energy
<b>CF12</b> Water Supply
<b>CF14</b> Telecommunications