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Your Ref: Pre-examination checklist

Our Ref: PINS/A2280/429/7

Date: 26 November 2025

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Dear Catherine,

## **Pre-examination checklist for local plans prepared under the Planning and Compulsory Purchase Act 2004**

### **Medway Local Plan: matters to address before submission for examination**

Thank you for completing the pre-examination checklist which we received on 24 November 2025.

Based on the answers that you provided to the checklist questions and a review of the explanations for some of the answers and relevant parts of documents referred to, I recommend that you address the matters set out in the attached Annex before submitting the Medway Local Plan for examination.

Once you have addressed the matters I have identified, I suggest you submit the Plan and other documents under regulation 22 as soon as possible. When you do so, please provide a brief written explanation of what you have done to address each of my recommendations and list any documents you have added or changed.

When you have submitted the Plan and other documents under regulation 22 we will seek to appoint an Inspector (or Inspectors) to conduct the examination in accordance with the timescales set out in the Service Level Agreement.

The completed checklist that we received on 24 November 2025, this letter and Annex, and your written description of the actions taken to address my recommendations should be published on the examination website in due course along with the Plan and other submission and supporting documents.

Please note that this is not an assessment of whether the Plan satisfies all relevant legal requirements and is sound as that will be determined by the examining Inspector(s) who will take account of all the Council's evidence, representations made under regulation 20, and any further information gathered during the examination. It is also possible that the

examining Inspector may have concerns about procedural matters, the scope of the plan, or evidence that I have not identified from the pre-examination checklist.

Yours

*William Fieldhouse*

**Duty to Cooperate Statement**

The Council's response to Q2.3 refers to the Duty to Cooperate Statement June 2025 being updated for submission. The duty to cooperate applies up to the point the Plan is submitted for examination and therefore an updated Duty to Cooperate Statement should be finalised before submission that reflects the statements of common ground referred to below (and any other significant changes since June 2025 relating to strategic matters) **[CR1]**.

**Statements of common ground**

The Duty to Cooperate Statement June 2025 indicates that the Council anticipates the need to agree a final composite statement of common ground with Gravesham Borough Council; Maidstone Borough Council; Tonbridge & Malling Borough Council; Swale Borough Council; Kent County Council; Environment Agency; Natural England; Historic England; and National Highways. The composite statement of common ground (and/or separate statements of common ground with individual bodies) should be finalised before submission **[CR2]**.

The Council's response to Q2.5 refers to ongoing discussions with Natural England, Environment Agency, National Highways and Thurrock Council relating to outstanding strategic matters. The composite statement of common referred to above and/or individual statements of common ground should be finalised with regard to those outstanding matters before submission **[CR3]**.

**Habitats Regulation Assessment and Natural England**

The Council's responses to Q2.5 and Q2.13 refer to the Habitats Regulation Assessment being updated. The updated Habitats Regulation Assessment should be finalised and a statement of common ground agreed with Natural England before submission. If this indicates that modifications to the Plan are needed to make it effective in ensuring that there will be no adverse effect on the integrity of any habitats sites these should be set out in the statement of common ground **[CR4]**.

**Strategic road network and National Highways**

The statement of common ground with National Highways referred to in the Council's response to Q2.5 should **[CR5]**:

- a) Confirm that the Plan is supported by up-to date, adequate evidence assessing the individual and cumulative impacts on highway safety and the road network.
- b) Address whether any significant impacts on the road network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
- c) Address whether the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

- d) Identify the relevant policies in the Plan that will ensure the necessary mitigations are provided.

### **Superseded policies in the adopted development plan**

The Council's response to Q2.17 advises that the Plan does not identify all of the policies in the adopted development plan that are intended to be superseded by policies in the Plan and state that fact. The Council should draft a proposed modification to the Plan which would ensure compliance with regulation 8(5) [CR6].

### **Consultation Statement**

A Regulation 22 Consultation Statement containing all of the information referred to in Q2.18 and Q2.19 should be finalised before submission [CR7].

### **Housing land supply**

The Council's responses to Q3.5 and Q3.6 refer to a Housing Topic Paper being prepared. This should be finalised before submission and include / be accompanied by up-to-date evidence to demonstrate that each site that makes up the land supply identified in the Plan meets the NPPF definitions of "deliverable" or "developable", along with a trajectory for each site. The evidence for each site should include that set out in national planning guidance, in particular PPG ID: 68-007-20190722 (for sites considered "deliverable") and PPG ID: 68-020-20190722 (for sites considered "developable") [CR8].

### **Gypsy and traveller accommodation**

The Council's response to Q3.9 states that the Plan does not include pitch targets for gypsies and travellers and plot targets for travelling showpeople. The response to Q3.10 states that the Plan does not identify specific deliverable and developable sites to meet the need for additional traveller accommodation identified in the Gypsy and Traveller Accommodation Assessment (2024) and Addendum (2025). The Topic Paper referred to should be finalised before submission and include the following [CR9]:

- a) A draft modification to the Plan setting out pitch targets for gypsies and travellers and plot targets for travelling showpeople.
- b) An explanation for why the Plan does not identify specific deliverable and developable sites to meet the need for additional traveller accommodation.
- c) The latest information about where additional accommodation could be provided, including through intensifying and/or expanding existing sites; on sites that have been granted planning permission; and on any other sites.

### **Main town centre uses**

The Topic Paper referred to in the Council's response to Q3.14 should be finalised before submission and include the following [CR10]:

- a) A summary of the quantified need for additional floorspace for office, retail, and leisure uses identified in the Employment Land Needs Assessment 2025 and Retail and Town Centres Study 2025.
- b) An explanation of where the Plan proposes that need will be met.

### **Site selection methodology**

The Council's response to Q3.16 states that the explanation of how the allocations (for housing, economic development and other uses as relevant) were chosen and other potentially reasonable alternative sites not chosen is set out in the Sustainability Appraisal volume 2 and Land Availability Assessment 2025. Those two documents refer to hundreds of reasonable alternative sites being identified and assessed. The Land Availability Assessment sections 1 and 2 describes how sites were identified and assessed and Appendix E includes assessments of individual sites. Section 5.6 of the Sustainability Appraisal volume 2 refers to Appendix J outlining the reasons for selection and rejection of each reasonable alternative site.

The Council should consider whether the Housing Topic Paper referred to in the responses to Q3.5 and Q3.6 should include a brief overview / summary of the site selection process with cross reference to specific parts of the Sustainability Appraisal and Land Availability Assessment [CR11].

### **Green Belt**

The Council's responses to Q3.18 and Q3.19 state that the Plan includes changes to the established Green Belt and that these are identified on the policies map. The policies map seems to show the Green Belt as proposed in the Plan. The Topic Paper referred to in the response to Q3.19 should be finalised before submission [CR12] and:

- a) Identify each change to the Green Belt boundary as proposed in the Plan compared to the adopted plan (in a list and on maps showing all of the boundary changes).
- b) Summarise what the exceptional circumstances are at a strategic level for changing the Green Belt in the Plan and at a site specific level for each individual change (additions and/or deletions, irrespective of size).

### **Flood risk**

The updated Level 2 Flood Risk Assessment referred to in the response to Q3.21a should be finalised before submission (and, if necessary, the Flood Risk Sequential Test Report referred to in the responses to Q3.21b and Q3.2c should also be updated) [CR13].