

Examination of the Medway Local Plan 2041

Schedule of Matters, Issues and Questions Phase 2 Hearings

1 October 2026

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Introduction

Following our initial examination of the Medway Local Plan 2041 (the Plan) and the supporting material and the completion of the Phase 1 Hearings, we now set out below the Matters, Issues and Questions (MIQs) for the Phase 2 Hearings regarding the soundness of the Plan. These should be read in conjunction with the Guidance Note (ref: ED13) for people participating in the examination which was issued on **30 July 2026**.

Participants should be aware that the Council has published a number of additional documents to their evidence base which are located on the examination website¹ and which representors may wish to consider in their responses to the MIQs below.

An initial Hearings Programme for the Phase 2 Hearings will be published on the examination website at the same time as this Schedule. Agendas for the individual hearing sessions, if appropriate, may be issued prior to the hearings commencing.

The questions identified below are primarily focussed on the Plan's policies and the tests of soundness found in Paragraph 36 of the National Planning Policy Framework 2024. Insofar as they relate to the Plan's soundness, other elements of the Plan including the supporting text will be considered as part of the discussion of the relevant policies.

Apart from the Council, there is no obligation for participants to produce hearing statements. **You should only do so if there is something to add to your original representation - do not repeat what is in your original representation, just provide a cross reference to it where necessary.**

We will determine the manner in which discussions take place at the hearings. Indeed, subject to the responses received to these MIQs and considering all relevant factors, it may be that a hearing session is no longer necessary for particular policies or issues as written responses provide sufficient information for the determination of soundness. Any proposed changes to the published Phase 2 Hearings Programme will be notified through the Programme Officer and on the examination website which will be the main source for information during the examination.

As identified within the Guidance Note, all references below to the National Planning Policy Framework are to the December 2024 version. Where respondents answering the following questions identify a deficiency in the Plan, as submitted, they should also make clear how it should be changed and why.

Furthermore, as a result of these questions and other matters, should any substantive changes to policies or text in the submitted Plan be proposed by the Council, then these should be added to the Schedule of Proposed Main Modifications, as necessary. This schedule should be kept up to date and the latest version published prior to the examination hearings.

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¹ Medway Local Plan 2041 Examination Webpage: <https://medway.oc2.uk/>

Matter 9 – Transport

Issues

Whether the Plan has a transport strategy that is justified by proportionate evidence, is capable of supporting the scale and distribution of growth proposed and is consistent with national policy.

Whether the transport strategy provides sufficient capacity to accommodate the proposed scale of development.

Whether the Plan and its relevant policies provide an effective framework for achieving sustainable travel and transport solutions.

Questions

Transport Strategy and Capacity

- 9.1 What evidence demonstrates that the transport strategy can facilitate and accommodate the scale and distribution of development across Medway proposed by the Plan?
- 9.2 How does the transport strategy support the Spatial Development Strategy, particularly the scale of growth proposed on the Hoo Peninsula and within regeneration areas?
- 9.3 Have all strategic highway, public transport, active travel and rail infrastructure requirements been identified?
- 9.4 What are the principal transport constraints to growth and how will they be addressed?
- 9.5 What contingency measures exist to deliver the required development growth if key transport schemes are delayed or not delivered?

Policy DM15: Monitoring and Managing Vehicle Trip Generation

- 9.6 What evidence demonstrates that the approach to monitoring and managing vehicle trip generation is necessary in addition to Transport Assessments and Travel Plans?
- 9.7 How have the thresholds and triggers referred to in Policy DM15 and the supporting text been derived?
- 9.8 How would the policy operate where monitored trip generation differs materially from that forecast in supporting transport evidence?
- 9.9 What mechanisms exist to secure additional mitigation where monitoring identifies greater impacts than originally anticipated?
- 9.10 How will cumulative impacts from multiple developments be monitored and attributed?
- 9.11 Who would be responsible for collecting, maintaining and reviewing monitoring data and for producing and maintaining mechanisms for doing so, such as the envisaged Medway-wide Monitor and Management Mitigation Strategy?
- 9.12 Is Policy DM15 sufficiently precise and effective to be implemented consistently through the development management process?

Policy T20: Riverside Path

- 9.13 What evidence demonstrates the need for the Riverside Path? Is it necessary or is it aspirational?
- 9.14 How does the proposed route contribute to the Plan's transport, recreation and regeneration objectives?
- 9.15 What sections of the route rely on third-party land ownership and how will access to these sections be secured?
- 9.16 Have constraints relating to operational river uses, port activities, ecology, flood risk or land ownership been identified and fully assessed? If so, how?

- 9.17 How will gaps in provision of the Riverside Path route be addressed where delivery cannot be secured?
- 9.18 Is there sufficient certainty that the Riverside Path can be delivered within the Plan period? If so, how that been demonstrated?
- 9.19 Is Policy T20 sufficiently flexible where parts of the route prove undeliverable?
- 9.20 Is the full route shown on the Policies Map and, if not, how will route alignment be determined?
- 9.21 Are main modifications required to improve clarity regarding delivery, safeguarding or route alignment?

Policy DM16: Chatham Waters Line

- 9.22 What is the purpose of the Chatham Waters Line and how does it support the wider transport strategy?
- 9.23 What evidence demonstrates a need for safeguarding the route?
- 9.24 What evidence supports the proposed alignment?
- 9.25 What assessment has been undertaken of feasibility, deliverability and likely demand?
- 9.26 Have alternative alignments or transport solutions been considered, for example where any part of the proposed alignment may not be feasible, available or accessible and, if so, why were they discounted?
- 9.27 Is the line intended to be delivered during the Plan period or safeguarded for longer-term provision?
- 9.28 What land requirements and infrastructure constraints have been identified?
- 9.29 How will development affecting the safeguarded corridor be assessed?
- 9.30 Is there a realistic prospect of implementation and funding?
- 9.31 Is Policy DM16 effective and justified if a funding mechanism has not yet been identified?

Policy DM17: Grain Branch

- 9.32 What evidence demonstrates a continuing need to safeguard the Grain Branch?
- 9.33 What assessment has been undertaken of future freight demand?
- 9.34 Have future passenger opportunities been assessed and if so, what conclusions were reached?
- 9.35 How has Network Rail informed preparation of the policy?
- 9.36 Are the safeguarding arrangements proportionate, having regard to competing land uses and development opportunities?
- 9.37 Is the safeguarded alignment shown clearly on the Policies Map?
- 9.38 Under what circumstances would development affecting the route be acceptable?
- 9.39 Are the safeguarding requirements justified, effective and consistent with national policy?

Policy T21: Riverside Infrastructure

- 9.40 What infrastructure in particular is safeguarded by Policy T21?
- 9.41 Have safeguarding boundaries been derived and assessed in relation to Policy T21 and if so, are these clearly shown on the Policies Map?
- 9.42 What evidence demonstrates continuing operational need for the safeguarded facilities and their purposes?
- 9.43 Is there any conflict between the safeguarding provisions of Policy T21 and regeneration proposals elsewhere within the Plan?

- 9.44 Under what circumstances would relocation or redevelopment of safeguarded infrastructure be acceptable?
- 9.45 Is Policy T21 sufficiently precise to operate effectively in determining planning applications?

Policy T22: Marinas and Moorings

- 9.46 What evidence supports additional marina and mooring provision?
- 9.47 Has existing capacity and future demand for marina and mooring facilities been assessed?
- 9.48 How does Policy T22 contribute towards tourism, recreation and economic objectives?
- 9.49 How does the policy address potential impacts upon designated habitats and species?
- 9.50 Have cumulative impacts on the Medway Estuary and river environment been assessed?
- 9.51 How does the policy align with marine and maritime planning objectives and relevant environmental legislation?
- 9.52 How does Policy T22 balance economic benefits against environmental impacts and how will cumulative impacts be assessed?
- 9.53 How does Policy T22 relate to other policies in the Plan, such as Policy T7: Houseboats?
- 9.54 Is the policy sufficiently clear regarding residential moorings and long-term occupation?
- 9.55 Is Policy T22 justified, effective and consistent with national policy?

Policy T23: Aviation

- 9.56 What specific aviation facilities at Rochester Airport are safeguarded by Policy T23?
- 9.57 What evidence demonstrates the need for continuing operational requirements of Rochester Airport?
- 9.58 Have any safeguarding areas relating to Policy T23 been identified? If so, how were they derived?
- 9.59 Are safeguarding areas relating to Policy T23 shown on the Policies Map?
- 9.60 Is Policy T23 consistent with national aviation policy and guidance?
- 9.61 Are the restrictions imposed by the policy proportionate?
- 9.62 How does the policy balance airport safeguarding with wider growth and regeneration objectives?
- 9.63 Is Policy T23 justified by proportionate evidence and is it effective?

Policy T24: Urban Logistics

- 9.64 What evidence demonstrates the need for urban logistics facilities in Medway?
- 9.65 How does Policy T24 differ from, and add to, the general employment land policies of the Plan?
- 9.66 What role are urban logistics facilities expected to play in supporting future growth?
- 9.67 Have suitable locations been identified and assessed?
- 9.68 How does the policy support sustainable freight movement and last-mile delivery solutions?
- 9.69 Are the policy requirements sufficiently clear for decision-making purposes?
- 9.70 How does it contribute to sustainable freight movement?
- 9.71 How will amenity, traffic and environmental impacts be addressed?
- 9.72 Is Policy T24 justified by proportionate evidence and is it effective?

Policy T25: User Hierarchy and Street Design

- 9.73 How does Policy T25 effectively implement the transport hierarchy contained within national policy?
- 9.74 Is the user hierarchy consistent with current Government guidance relating to active travel and street design?

- 9.75 What evidence informed the street design requirements?
- 9.76 How will conflicts between walking, cycling, public transport, servicing and private vehicle movements be resolved?
- 9.77 Are the requirements of the policy sufficiently precise to ensure consistent application in development management decisions?
- 9.78 Does the policy provide enough flexibility where site-specific constraints exist?

Policy T26: Accessibility Standards

- 9.79 What evidence supports the accessibility standards set out in Policy T26?
- 9.80 How were accessibility thresholds derived?
- 9.81 Have the standards in the policy been tested through the Plan's viability evidence?
- 9.82 Are the standards realistic and achievable across all parts of Medway?
- 9.83 How would Policy T26 apply to brownfield regeneration sites where standards cannot immediately be met?
- 9.84 How will compliance be measured and assessed?
- 9.85 Is Policy T26 sufficiently flexible to respond to changing accessibility circumstances over the Plan period?

Policy DM18: Transport Assessments, Transport Statements and Travel Plans

- 9.86 Are the policy thresholds requiring Transport Assessments, Transport Assessments and Travel Plans clearly set out and are they justified and effective?
- 9.87 How do the requirements of Policy DM18 compare with national guidelines and Kent County Council guidance?
- 9.88 What evidence demonstrates the effectiveness of Travel Plans in reducing reliance on private car travel?
- 9.89 How will Travel Plans be monitored and enforced?
- 9.90 What happens where Travel Plan targets are not achieved?
- 9.91 Are monitoring requirements clear, proportionate and deliverable?
- 9.92 Could the policy create unnecessary burdens on smaller developments?

Policy DM19: Vehicle Parking

- 9.93 How were parking standards derived and is the evidence relied upon for them sufficiently up-to-date?
- 9.94 Have differing parking demands across urban, suburban and rural areas of Medway been considered?
- 9.95 Are the standards consistent with the wider transport strategy and objectives for modal shift?
- 9.96 Is sufficient flexibility provided in highly accessible locations?
- 9.97 How would departures from the parking standards be assessed?
- 9.98 Have the viability implications of parking provision requirements been assessed?
- 9.99 Are electric vehicle charging requirements justified and deliverable?

Policy DM20: Cycle Parking and Storage

- 9.100 What evidence supports the cycle parking standards?
- 9.101 Are these standards in Policy DM20 consistent with current best practice guidance?
- 9.102 How were the cycle parking standards derived?

- 9.103 What constitutes secure, convenient and accessible cycle storage for the purposes of Policy DM20?
- 9.104 How will the quality of provision be secured through development management?
- 9.105 Are the requirements achievable across all development types and in higher-density and mixed-use developments?
- 9.106 Is there evidence that the standards are likely to promote and contribute to modal shift?
- 9.107 Is Policy DM20 justified, effective and consistent with national policy?

Matter 10 – Health, Communities & Infrastructure

Issue

Whether the Plan provides a robust framework for improving health and wellbeing, reducing health inequalities, sustaining and enhancing local communities and infrastructure delivery which is justified, effective and consistent with national policy.

Questions

Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing

- 10.1 Does the length of Policy T27 impact on its effectiveness with regard to consistency and the number of health and well-being matters that it concerns?
- 10.2 What is the difference between the 2 sets of bulleted criteria under Policy T27, in relation to what they seek to achieve and their deliverability, and therefore their effectiveness?
- 10.3 How would Policy T27 be deliverable and therefore effective where it refers to 'selling fresh food' (first set of bulleted criteria, last but one bullet point)?
- 10.4 Where the second list of bulleted criteria under Policy T27 refers to major development, how is this defined?
- 10.5 Is Policy T27 seeking to control the uses under criteria b), c) and d) consistent with national policy?
- 10.6 What is the local evidence to support the control of specifically these uses, under criteria b), c) and d)?
- 10.7 Is the approach under Policy T27 (below the a), b), c) and d)) criteria on page 188) to control hot food takeaways consistent with national policy, in particular as it would seem to apply in town centres and introduce obesity controls?

Policy T28: Existing Open Space, Outdoor Sports and Play Spaces

- 10.8 Are the existing open spaces, outdoor sports and play spaces which Policy T28 seeks to protect defined on the Policies Maps?
- 10.9 Would a proposal have to meet only one of the criteria (a. to e.) under Policy T28 for publicly accessible open space to be lost, or is a different approach to these criteria proposed in terms of the effectiveness of the policy?
- 10.10 Are the criteria in Policy T28 (a. to i.) consistent with national planning policy?
- 10.11 Is the Plan seeking to designate land as Local Green Space (paragraph 10.3.4)?
- 10.12 What is the evidence base which supports Policy T28 (and DM21), noting that the Open Space Assessment is a draft document (paragraph 10.3.6)? **Note:** We are not encouraging the Council to submit any further evidential documents.
- 10.13 Do the emerging Built Facilities Strategy (MLP/ED11A), Facilities Planning Model (MLP/ED11B) and Playing Pitch Strategy (MLP/ED11C) have any bearing on Policy T28

(and DM21)? **Note:** We are not encouraging the Council to submit any further evidential documents.

- 10.14 Do these Strategies and Sport England representations to the Plan necessitate a main modification to this policy / these policies in considering the Council's Response to Inspectors' Initial Questions (MLP/ED6) (page 8, under 17.) and the Statement of Common Ground with Prescribed Bodies (MLP/ED24A) (section 2.14)?

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

- 10.15 Does Policy DM21 seek to rely on Fields in Trust Standards (2024) (as set out in the first paragraph of the policy itself) or the Council's standards in its Open Space Assessment (2024) (as set out in paragraph 10.3.8) and which is understood to be in draft form (paragraph 10.3.6)?
- 10.16 How would Policy DM21 apply if these standards change during the time period of the Plan?
- 10.17 What type of development would Policy DM21 apply to in relation to making new open space, outdoor sports and play spaces provision and in the case of residential development what types would be specifically excluded?
- 10.18 Where criterion d. of the first list of criteria refers to minor development, how is this defined for the purposes of Policy DM21?
- 10.19 How is criterion f. of the first list of criteria under Policy DM21 consistent with a standards-based method, as it concerns a pre-application discussion-based approach to on-site open space provision?

Policy T29: Community and Cultural Facilities

- 10.20 Is the list of community facilities (paragraph 10.4.1) intended to be a definition of such facilities for the purposes of Policy T29, noting that there is a later reference to shops and healthcare facilities (paragraph 10.4.7)
- 10.21 Does this policy consider new healthcare facilities, such as hospitals and doctors surgeries?
- 10.22 Are education facilities the subject of the policy?
- 10.23 If open space in any form would be the subject of Policy T29, how would this operate with Policies T28: Existing Open Space, Outdoor Sports and Play Spaces and DM21: New Open Space, Outdoor Sports and Play Spaces, in terms of effectiveness as they would all cover the same matter (open space)?
- 10.24 What development would Policy T29 apply to in terms of providing community and cultural facilities, and what types of development would be specifically excluded?
- 10.25 Where the third paragraph of Policy T29 refers to large scale residential development, how is this defined?
- 10.26 Why does the last paragraph of Policy T29 (with the bulleted list below) which deals with the loss of a community or cultural facility include a criterion (and sub-criteria) on new community facilities?
- 10.27 The Statement of Common Ground with Prescribed Bodies (MLP/ED24A) (section 2.14) refers to modifications that are needed following discussions with NHS Kent and Medway IDB. What are these, are they Main Modifications and do they relate to Policy T29, or any other policy?

Policy S24: Infrastructure Delivery

Strategic Role

- 10.28 What role does Policy S24 play in delivering the spatial strategy and strategic objectives of the Plan?
- 10.29 How does Policy S24 relate to the Infrastructure Delivery Plan (IDP) and what is the status of that document?
- 10.30 Which infrastructure projects are critical to the successful delivery of the Plan?

Infrastructure Requirements

- 10.31 What transport, education, healthcare, utilities, wastewater, flood defence, green infrastructure and community infrastructure requirements have been identified?
- 10.32 Have all strategic infrastructure requirements arising from the planned growth strategy been adequately identified and assessed, with proportionate evidence?
- 10.33 Are there any significant infrastructure deficits which already exist and, if so, how have they been addressed in the Plan?

Funding and Delivery

- 10.34 What proportion of identified infrastructure is expected to be funded through developer contributions and what proportion relies upon public funding or third-party investment?
- 10.35 Which infrastructure projects currently have secured funding?
- 10.36 Which projects remain unfunded or only partially funded?
- 10.37 Is there sufficient certainty regarding funding of infrastructure to conclude that the Plan is deliverable?

Critical Dependencies

- 10.38 Which infrastructure projects are prerequisites for development coming forward?
- 10.39 What would be the implications for housing and employment delivery if key infrastructure projects are delayed or do not come forward?
- 10.40 Does the policy contain appropriate triggers linking development and infrastructure provision?
- 10.41 Is the phasing of infrastructure in place and is it sufficiently clear?

Infrastructure Providers

- 10.42 Have infrastructure providers confirmed that the assumptions within the Plan and the IDP are reasonable and achievable?
- 10.43 Have utility providers identified any capacity constraints relating to water supply, wastewater treatment, electricity distribution, telecommunications or gas infrastructure?
- 10.44 Have healthcare and education providers confirmed that planned growth can be accommodated?

Monitoring and Review

- 10.45 How will delivery of infrastructure be monitored throughout the Plan period?
- 10.46 What indicators will be used to identify infrastructure delivery problems?
- 10.47 What contingency measures exist if critical infrastructure is delayed or fails to come forward?
- 10.48 Should the policy contain clearer monitoring or review mechanisms?

Consistency with Other Policies and Allocations

- 10.49 How does Policy S24 interact with site allocation policies and infrastructure-specific policies elsewhere in the Plan?
- 10.50 Is there any inconsistency between the Infrastructure Delivery Plan and infrastructure requirements identified within allocation policies?
- 10.51 Are any main modifications required to ensure consistency between Policy S24 and other policies and site allocations?

Soundness

- 10.52 Is Policy S24 positively prepared, justified, effective and consistent with national policy?
- 10.53 Does the evidence demonstrate that the infrastructure necessary to support the scale and distribution of development proposed by the Plan can be delivered within the Plan period?

Policy DM22: Digital Communications

Principle and Justification

- 10.54 What evidence demonstrates that additional local planning policy intervention is required to support digital communications infrastructure in Medway?
- 10.55 What deficiencies or constraints in digital connectivity, broadband provision or mobile coverage have been identified and how have they informed the preparation of Policy DM22?
- 10.56 How does Policy DM22 support the wider spatial strategy and economic development objectives of the Plan?
- 10.57 What evidence demonstrates that the policy is justified by local circumstances rather than relying upon matters already addressed through national policy and guidance?

Future Technology and Network Capacity

- 10.58 How does Policy DM22 support future telecommunications technologies, including gigabit-capable broadband, 5G and successor technologies?
- 10.59 Is the policy sufficiently flexible to accommodate technological change throughout the Plan period?
- 10.60 What evidence demonstrates that existing telecommunications infrastructure has sufficient capacity to support the scale of growth proposed by the Plan?
- 10.61 Have infrastructure providers identified any constraints or investment requirements that are necessary to support planned development?
- 10.62 How will new development contribute to improved digital connectivity?

Deliverability and Effectiveness

- 10.63 What consultation has taken place with telecommunications providers and how has that informed the policy?
- 10.64 Are the requirements of Policy DM22 capable of being consistently applied in development management decisions?
- 10.65 How would compliance with the policy be assessed?
- 10.66 Are the policy requirements proportionate to the scale and nature of development proposed?
- 10.67 Has the Council assessed the viability implications of the policy and its requirements?
- 10.68 Could the policy impose obligations which are beyond the control of applicants or developers?

Environmental and Design Considerations

- 10.69 How does Policy DM22 balance the provision of telecommunications infrastructure against visual, heritage, landscape and environmental considerations?
- 10.70 What safeguards exist to ensure that telecommunications infrastructure does not result in unacceptable impacts upon designated heritage assets, conservation areas, the Kent Downs National Landscape or other sensitive locations?

- 10.71 Does the policy provide a clear framework for balancing connectivity benefits against environmental impacts?

Relationship with Other Policies

- 10.72 How does Policy DM22 operate alongside Policies relating to design, heritage, landscape protection and infrastructure delivery?
- 10.73 Is there any duplication between Policy DM22 and national policy, Building Regulations requirements or other policies within the Plan?
- 10.74 Does the policy provide a sufficiently clear framework for developers, infrastructure providers and decision-makers?

Monitoring and Review

- 10.75 How will implementation of Policy DM22 be monitored throughout the Plan period?
- 10.76 What indicators will be used to assess whether digital connectivity objectives are being achieved?
- 10.77 If expected improvements in digital connectivity do not occur, what mechanisms exist to review the policy approach?

Soundness

- 10.78 Is Policy DM22 positively prepared, justified, effective and consistent with national policy?
- 10.79 Does the policy provide sufficient flexibility to support future advances in telecommunications and digital infrastructure over the Plan period?

Matter 11 – Energy

Issue

Whether the Plan contains a justified and effective strategy for energy generation, distribution and resilience and for renewable and low-carbon energy.

Whether the Plan helps to increase the use and supply of renewable and low carbon energy and heat in accordance with national policy.

Questions

General

- 11.1 What evidence informs the energy strategy?
- 11.2 How does the Plan support projected energy demand arising from planned growth?
- 11.3 Have energy infrastructure providers confirmed capacity and investment requirements?
- 11.4 Is additional energy network reinforcement required and, if so, how will this be delivered?
- 11.5 How will delivery be monitored throughout the Plan period?

Policy S25: Energy Supply

- 11.6 Is Policy S25 solely concerned with renewable and low carbon energy, or would it cover all types of potential energy supply, such as liquid natural gas (LNG)?
- 11.7 Does Policy S25 concern all types of renewable and low carbon energy?
- 11.8 Does Policy S25 also cover the infrastructure associated with energy supply development, or solely the energy supply production itself?

- 11.9 Where Policy S25 (first paragraph) sets out where there are suitable locations for renewable and low carbon energy development, what evidence is this based on in terms of justifying this approach?
- 11.10 Is Policy S25 (first paragraph) consistent with national policy where it goes onto state that proposals for such development will be supported if the potential adverse impacts are or can be made acceptable, rather than adverse impacts being addressed appropriately?
- 11.11 Is Policy S25 consistent with national policy where it refers to the threshold for consideration under the Planning Act 2008 (paragraph 3), and why is this a consideration for the Plan?
- 11.12 Why does Policy S25 concern low carbon hydrogen (paragraph 4), noting there is no reference to it in the supporting text?
- 11.13 If Policy S25 is intended to deal with LNG, why are there not specific criteria to deal with it?
- 11.14 What evidence specifically informs and supports Policy S25 and is it proportionate?
- 11.15 How does Policy S25 support and address future energy demand arising from growth in Medway?
- 11.16 How does Policy S25 contribute towards national net-zero objectives?

Policy T41: Heat Networks

- 11.17 Is there evidence to demonstrate that such an approach is viable and so justified for the types of development which Policy T41 specifies?
- 11.18 Where Policy T41 refers to development that is not feasible, what does this mean (apart from viability)?
- 11.19 Is there an update where there is reference to commissioning initial feasibility studies (paragraph 13.3.5) and does this impact on the approach which Policy T41 takes?
- 11.20 What evidence supports Policy T41 and demonstrates that heat networks are feasible within Medway?
- 11.21 Which growth areas and locations are expected to support heat networks?
- 11.22 What anchor loads have been identified?
- 11.23 What delivery mechanisms have been identified and have alternatives been considered?
- 11.24 How does Policy T41 respond to changing technologies and is it sufficiently flexible to accommodate them?
- 11.25 Have viability implications been adequately assessed and tested?
- 11.26 How will implementation be secured through the development management process?

Renewable and Low Carbon Energy

- 11.27 How has the potential for renewable and low carbon energy been assessed?
- 11.28 What opportunities exist for solar, wind, hydrogen and other renewable technologies within Medway and how does the Plan deliver on these?
- 11.29 How does the Plan balance renewable and low carbon energy delivery against environmental constraints?
- 11.30 Does the policy framework for renewable and low carbon energy within the Plan provide sufficient flexibility to respond to future technological change?
- 11.31 How will cumulative impacts relating to energy be assessed?

Matter 12 – Minerals and Waste

Issues

Whether the Plan and its relevant policies provide for a steady and adequate supply of minerals and is justified, effective and consistent with national policy.

Whether the Plan seeks to maintain a sufficient, sustainable supply of locally and nationally important minerals and adequately safeguard mineral resources and minerals infrastructure.

Whether the Plan's overall approach and policies in relation to waste that needs to be managed over the Plan period robust, justified, effective and consistent with national policy.

Questions

MINERALS

General

- 12.1 Given there appears to be some reliance on Kent for minerals, please explain the working arrangements for minerals with Kent County Council and if there are other (sub) regional groups?
- 12.2 Is the supporting evidence for the Plan's approach to minerals sufficiently robust and up-to-date and is it proportionate?
- 12.3 What engagement has occurred with the minerals industry regarding future operations over the Plan period?
- 12.4 As there is not a minerals monitoring policy, and it appears that monitoring is only mentioned to support Policy T31 (Paragraph 11.3.2 of the Plan), what are the monitoring arrangements that the Plan seeks to put in place for minerals?
- 12.5 Is there a reason why the vision for minerals is not included in the contents pages for the Plan?
- 12.6 How has future demand for minerals been assessed?
- 12.7 Does the Plan provide an adequate landbank for minerals throughout the Plan period?

Policy T30: Safeguarding Mineral Resources

- 12.8 How have Mineral Safeguarding Areas been defined?
- 12.9 What evidence supports the proposed boundaries and are they up-to-date?
- 12.10 Does Policy T30 apply only to Minerals Safeguarding Areas (MSA), or also to Minerals Consultation Areas (MCA)?
- 12.11 If Policy T30 does not apply to MCAs, how does the Plan seek to deal with development proposed in these areas, but outside of MSAs?
- 12.12 Which minerals are the subject of Policy T30 and shown on the Policies Maps?
- 12.13 Are safeguarding requirements proportionate?
- 12.14 How will prior extraction opportunities be considered and addressed?
- 12.15 Are consultation arrangements with neighbouring authorities appropriate and effective?
- 12.16 Is Policy T30 consistent with national policy?

Policy T31: Safeguarding Existing Mineral Supply Infrastructure

- 12.17 How were safeguarded wharves, railheads and associated facilities identified?
- 12.18 Are the safeguards proportionate and justified?

- 12.19 What evidence demonstrates continued need for the safeguarded infrastructure?
- 12.20 Are consultation areas justified?
- 12.21 Could alternative facilities realistically perform the same role?
- 12.22 How does safeguarding support regional and national supply chains?
- 12.23 Are MCAs shown for all of the 'Minerals Supply Site' notation on the Policies Maps?
- 12.24 Would Policy T31 seek to safeguard new minerals supply infrastructure that may take place during the Plan Period as the policy title refers to 'Existing'?
- 12.25 Would unidentified linear minerals supply infrastructure such as pipelines be protected by the Policy T31, if they are not identified either on the Policies Map or in a subsequent Annual Monitoring Report?

Policy T32: Supply of Recycled and Secondary Aggregates

- 12.26 What contribution do recycled and secondary aggregates currently make?
- 12.27 What evidence supports forecast demand?
- 12.28 How significant is the contribution from recycled aggregates?
- 12.29 Where Policy T32 states additional capacity for such production will 'generally' (first paragraph) be supported, is this effective?
- 12.30 Are sufficient facilities available to meet anticipated demand?
- 12.31 How will additional capacity be delivered?
- 12.32 How does Policy T32 support a circular economy approach?
- 12.33 Where Policy T32 criterion b. refers to other minerals operations, would this include minerals sites themselves, including quarries when operational?
- 12.34 Why is the paragraph which concerns location and transport after the list of criteria in Policy T32 not simply a further criterion?
- 12.35 Is it the case that when quarries have ceased operation (paragraph 11.4.6), they would not be supported as additional capacity for minerals production, under Policy T32?

Policy T33: Extraction of Land Won Minerals

- 12.36 How does the Plan, including Policy T33, provide for a steady and adequate supply of land won minerals?
- 12.37 Is Policy T33 consistent with national policy concerning the priority order for minerals supply?
- 12.38 Does Policy T33 establish clearly what the needs are for minerals over the Plan period, by type of mineral?
- 12.39 How were extraction locations identified?
- 12.40 Noting Figure 8: Economic Geology of Medway, is any of the chalk reserve high quality and might give rise to future workings over the Plan period?
- 12.41 While no new sites have been promoted under Policy T33 (paragraph 11.5.7), has the expansion of existing sites been considered?
- 12.42 Is it the intention that development management-based policies found elsewhere in the Plan would be used to consider the effects from such development?
- 12.43 Is there a typographical error at the start of paragraph 11.5.9 (1.5.9)?

WASTE

General

- 12.44 Should the current Municipal Waste Management Strategy (paragraph 12.1.12) be considered an up-to-date part of the evidence, as it dates from 2006?

- 12.45 How are the waste capacity requirement tables (4, 5a and 5b) reflected in the subsequent waste policies?
- 12.46 How is green waste reflected in the waste policies of the Plan?
- 12.47 In the absence of a specific policy, what are the monitoring arrangements that the Plan seeks to put in place for waste?
- 12.48 How have future waste arisings been forecast?
- 12.49 How does the Municipal Waste Management Strategy align with the Waste Hierarchy?
- 12.50 Does the Plan provide sufficient waste capacity throughout the Plan period?
- 12.51 Have cross-boundary movements of waste been appropriately considered?

Policy DM23: Waste Prevention

- 12.52 What evidence supports the need for Policy DM23 and demonstrates that additional local planning policy intervention is required to promote waste prevention in Medway?
- 12.53 Is the policy justified by proportionate evidence?
- 12.54 How does Policy DM23 contribute to the delivery of the Waste Hierarchy and what outcomes are expected in terms of reducing waste arisings across the Plan period?
- 12.55 Does Policy DM23 only apply to 'qualifying development proposals' (last paragraph of the policy), as defined, or is any aspect of it intended to apply to all development proposals?
- 12.56 Where reference is made to that it being essential that all proposals for residential development are designed to allow for separate storage of residual, recyclable and compostable materials (paragraph 12.3.9), is this approach effective as it is not stated in Policy DM23 itself?
- 12.57 Is the policy consistent with national policy and waste management objectives?
- 12.58 How have future waste arisings been forecast and to what extent does Policy DM23 support the assumptions underpinning those forecasts?
- 12.59 Is there a clear relationship between waste prevention measures and projected waste management capacity requirements?
- 12.60 Are the requirements of Policy DM23 sufficiently clear, effective and enforceable through the development management process?
- 12.61 What evidence is there to demonstrate that applicants and decision-makers will be able to apply the policy consistently?
- 12.62 How does Policy DM23 address waste prevention during the design, construction, occupation and demolition phases of development?
- 12.63 Are all relevant stages of the development lifecycle adequately covered?
- 12.64 Has the Council considered the viability and deliverability implications of the policy requirements and are they proportionate to the scale and nature of development proposed?
- 12.65 What monitoring indicators and review mechanisms will be used to assess the effectiveness of Policy DM23 during the Plan period, and what action would be taken if waste reduction objectives are not being achieved?

Policy T34: Safeguarding of Existing Waste Management Facilities

- 12.66 Would Policy T34 seek to safeguard new waste management facility development that may take place during the Plan Period, as the policy title refers to 'Existing'?
- 12.67 Is Policy T34 formatted as intended as it repeats criteria notations around paragraphs in between?
- 12.68 How were safeguarded waste facilities selected?

- 12.69 What evidence demonstrates continued operational need?
- 12.70 Would Policy T34 permit the loss of a safeguarded site where it may no longer be fit for purpose as a waste management facility?
- 12.71 Under what circumstances would redevelopment be acceptable?
- 12.72 Is the 250-metre safeguarding area for waste management facilities (paragraph 12.4.5) shown on the Policies Map, with regard to whether the policy would be effective?
- 12.73 Are the safeguarding provisions clear and effective?

Policy T35: Provision of Additional Waste Management Capacity

- 12.74 Is it an effective approach to have a separate policy for the provision of Additional Waste Management Capacity, when the waste policies which follow Policy T35 also concern additional waste management capacity, whether by location or type of waste?
- 12.75 Is there duplication between Policy T35 and the policies which follow, and if so does this impact on the effectiveness of these policies?
- 12.76 Why are the various targets related to types of waste management detailed in the supporting paragraphs not included in Policy T35 itself as strategic requirements, or another waste policy, as it appears that the Plan itself is setting these targets (paragraph 12.5.7)?
- 12.77 Are these targets also consistent with national waste targets?
- 12.78 Have all waste streams been considered?
- 12.79 Is Policy T35 sufficiently flexible to respond to technological change?
- 12.80 Why is there a specific paragraph in Policy T35 (under the criteria) on other recovery facilities, as this is the subject of Policy T37?
- 12.81 Where Policy T35 states the quantity of the waste must be equal to at least what is currently managed (second paragraph from the end of the policy itself), what is this intended to achieve as an effective approach?
- 12.82 What does the reference to the management of Local Authority Collected Waste (LACW) biowaste subject to confirmation of acceptability (paragraph 12.5.11) mean, and would this have a bearing on the policy as regards construction and industrial waste recycling?
- 12.83 What is the capacity of this facility over the entirety of the Plan period for Medway's non-hazardous landfill?
- 12.84 Does the absence of an agreed Statement of Common Ground with Thurrock Council have a bearing on the soundness of the Plan as regards landfill waste capacity?
- 12.85 Where it is stated that hazardous waste (paragraph 12.5.27) is treated outside of Medway, is this consistent with earlier in the Chapter where it states that Medway has sufficient capacity to manage hazardous waste (paragraph 12.1.32)?
- 12.86 How does dealing with non-hazardous waste landfill (paragraph 12.5.21) and hazardous waste (paragraph 12.5.27) outside of Medway accord with national policy through the waste sustainability principle?
- 12.87 As the principal contract for LACW will expire during the Plan period (paragraph 12.1.24), how is this reflected in the waste policies of the Plan as regards additional waste management capacity?
- 12.88 Is it still the case there is sufficient wastewater treatment capacity to meet current and future growth (paragraph 12.5.30), or are wastewater treatment works now approaching capacity, having regard to the views of all relevant statutory bodies?

- 12.89 How does Policy T35 seek to address capacity issues with sewage sludge treatment capacity (paragraph 12.5.31)?

Policy T36: Location of Waste Management Facilities

- 12.90 How does Policy T36 ensure that impacts on amenity, highways and the environment are addressed?
- 12.91 Are the locational criteria sufficiently clear and effective and how do they relate to the waste hierarchy?
- 12.92 How will cumulative impacts be assessed?
- 12.93 Are environmental safeguards adequate?
- 12.94 Is it the intention Policy T36 would be the development management policy that waste management development would be considered against, in terms of the policy's purpose and effectiveness?
- 12.95 What does 'located in an area which can accommodate the proposed development' mean in the last but one sub-bulleted criteria of Policy T36?
- 12.96 How has the definition of 'greenfield' for the purpose of Policy T36 under footnote 42 been derived?
- 12.97 While waste electrical and electronic equipment is referred to in the supporting text to Policy T36 (paragraph 12.6.1), it does not in itself appear to be the subject of a policy in the Plan. Why is this?

Policy T37: Other Recovery

- 12.98 Is Policy T37 intended to apply to extensions and improvements to existing Energy from Waste facilities, and if so would it have to comply with the criteria under the policy as an existing facility?
- 12.99 What forms of recovery are supported?
- 12.100 How will proposals be assessed?
- 12.101 What evidence supports the policy approach?
- 12.102 Is the policy sufficiently flexible for future technologies?
- 12.103 How does it contribute to waste reduction objectives?
- 12.104 Is the paragraph numbering in the supporting text to Policy T37 as intended for the last paragraph on page 238?

Policy T38: Non-Inert Landfill

- 12.105 What evidence demonstrates continuing need for landfill capacity?
- 12.106 Why is it justified for Policy T38 seeking to support such development, given that it is at the bottom of the waste hierarchy under national policy and that it can only apply where such waste cannot be reasonably managed in any other way?
- 12.107 How would landfill demand be effectively managed over the entirety of Plan period under Policy T38, as no allocations are proposed, in considering the need for self-sufficiency under national policy and as Thurrock Council has been unable to confirm its landfill could continue to utilise non-inert capacity as set out in Appendix A of the Council's Response to the Inspectors' Initial Queries Letter (MLP/ED6)?

- 12.108 Why does Policy T38 also seek to support the reworking of old landfill sites, as it is also stated that it can be a hazardous activity (paragraph 12.8.5)?
- 12.109 Does Policy T38 seek to control the management of landfill gas, as it only refers to it in the context of maximising energy recovery (criterion c. i.)?
- 12.110 Is the policy formatted as intended as it repeats criteria notations around a paragraph in between?
- 12.111 Have alternative recovery options been fully assessed?
- 12.112 Are environmental safeguards adequate?
- 12.113 Is the policy justified by forecast need?

Policy T39: Beneficial Use of Inert Waste by Permanent Deposit

- 12.114 Is Policy T39 justified in requiring under criterion b. for such waste development to 'significantly' enhance other development or its setting?
- 12.115 Does Policy T39 provide a more stringent approach in dealing with inert waste in the way it is worded, compared to non-inert waste under Policy T38 and if so, why and how is this consistent with national policy?

Policy T40: Wastewater Treatment

- 12.116 With regard to criterion a. of Policy T40, is this referring to wastewater infrastructure development itself, or other types of development that would have to meet these standards and provisions.
- 12.117 Why is it justified for a development to have to meet 'prospective' environmental standards under criteria a.?
- 12.118 Is the use of 'and/or' between the two criteria under Policy T40 effective over how a development would achieve policy compliance?
- 12.119 Where there is reference for this type of development to potentially be an exception to Policy T36 Locational Requirements (paragraph 12.10.1), is it effective for the wording of Policy T40 itself not to state this?
- 12.120 Where there is reference to pollution and human health effects of such development (paragraph 12.10.3), is this intended to be dealt with by other development management policies of the Plan?

Matter 13 – Site Allocations (Policies SA1-SA14)

Issues

Whether the site allocation strategy for Capstone Valley, Hoo St Werburgh and Chattenden, High Halstow, Lower Rainham and the Rural Settlements is justified by proportionate evidence, positively prepared and capable of delivery within the Plan period.

Whether the allocations are supported by adequate infrastructure, environmental mitigation and necessary safeguards relating to biodiversity, landscape, heritage, transport, flood risk and other constraints.

Whether the policies provide a clear and effective framework for decision making and are consistent with national planning policy.

Questions

General

- 13.1 What is the role of the Council in the delivery of the site allocations, over the Plan Period, in terms of what mechanisms, delivery vehicles and infrastructure provision arrangements it has, or will, put in place?
- 13.2 Following on from discussions at the Phase 1 Hearings in particular in relation to flood risk, please provide updated 'Plan Period (Years)' in the site-specific information tables for each allocation.
- 13.3 Under the site-specific information tables for each site, how have the capacities been derived for the individual sites?
- 13.4 Under the site-specific information tables for each site, how has the plan period for delivery been decided for each site?
- 13.5 Under the site-specific information tables for each site, how have infrastructure and utilities requirements been considered in the plan period for delivery, including any related flexibility?

Policy SA1: Chatham Town Centre and Surrounds

- 13.6 Is Policy SA1 consistent with Policy S17: Chatham Town Centre?
- 13.7 Is there duplication between Policy SA1 and Policy S17, and does this impact on the effectiveness of the policy?
- 13.8 How has the circa 1,350 capacity for the strategic allocation been derived (criterion 3.)?
- 13.9 Why is housing mix and affordable housing a criterion (5.) specifically for this strategic allocation under Policy SA1?
- 13.10 Noting the reference to an Air Quality Management Area under Policy SA1, does air quality (criterion 9.) have the potential to impact on deliverability?
- 13.11 Why does Site FP25 provide an opportunity to reveal much about the history of Chatham (criterion 10.b) and why is a masterplan required for this site (criterion 13.)?
- 13.12 Is the provision of green-blue infrastructure and suitable walking and cycling links a specific issue for this site allocation (criterion 11.) and what would be required?
- 13.13 Is criterion 12. of Policy SA1 formatted and worded in the way which is intended?
- 13.14 Why is a heritage, townscape and visual impact assessment required for sites CCB49 and GS2 (criterion 14.), but not for sites FP10 and FP25 (criterion 10.)?
- 13.15 Where 'flood risk assessment' is identified under Policy SA1 (criterion 15.) what does this mean as regards a design principle (the sub-heading)?
- 13.16 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA1, as set out in its Phase 1 Hearing Statement.
- 13.17 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, and will this have a bearing on deliverability?

Policy SA2: Heritage-led Sites

- 13.18 How have these 2 strategic heritage-led sites been derived, and their overall capacities decided on?
- 13.19 Policy SA2 includes a number of supporting documents, including the Interface Land Supplementary Planning Document, the Star Hill to Sun Pier Development Framework and a Conservation Area Appraisal. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy?
- 13.20 Under the 'Site-specific Information table', what mixed-use would site ref: CCB35 be put to?

- 13.21 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA2, as set out in its Phase 1 Hearing Statement.
- 13.22 Under the 'Site-specific Information table', will any of the sites require upfront archaeological work and, if so, will this have a bearing on deliverability and a need for flexibility?
- 13.23 Please clarify if a main modification is in fact proposed to this policy to address potential impacts on the North Downs Woodland Special Area of Conservation (SAC) south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) and its Phase 1 Hearing Statement on Matter 6 Natural Environment (6.12.3)?
- 13.24 How was the effect of the Interface land allocations considered on the operational activities of the Chatham Dockyard, including its basins?

Policy SA3: Gillingham District Centre

- 13.25 Is Policy SA3 consistent with Policy S19: Gillingham District Centre?
- 13.26 Is there duplication between Policy SA3 and Policy S19 and does this impact on the effectiveness of the policy?
- 13.27 How has the circa 100 new homes capacity for this strategic allocation been derived (criterion 3.)?
- 13.28 Where Policy SA3 states 'demonstrate compliance with relevant guidance' (criterion 10.) as the sole design principle, is this an effective way to plan for these sites in terms of what might be required?
- 13.29 How does the policy address potential impacts on the North Downs Woodland SAC south of Lidsing, as referred to in the Council's Response to the Inspectors' Initial Queries (MLP/ED6) (page 3, under 6.) which refers to this site?

Policy SA4: River Waterfront

- 13.30 Is the riverside walk that Policy SA4 envisages will be provided (criterion 1.) shown on Figure 11: River Waterfront Concept Plan?
- 13.31 How has the circa 4,197 capacity for this strategic allocation been derived (criterion 2.)?
- 13.32 Why is Policy SA4 not more specific on building heights (criterion 6.), in terms of whether the approach which is proposed would be justified and effective?
- 13.33 Who would be responsible for the green-blue infrastructure strategy under Policy SA4 (criterion 7.) for this strategic allocation?
- 13.34 Where Policy SA4 states that the urban context will not provide for adequate space to meet all of the requirements for open space and playing pitch provision (criterion 8.), does that mean that less than the required provision under Policy DM21: New Open Space, Outdoor Sports and Play Spaces will be provided for open space and playing pitch provision on this strategic allocation?
- 13.35 Who would be responsible for the development brief for site SM16 (criterion 14.) and please explain why this site appears to be split on the Policies Map (two 'SM16' notations)?
- 13.36 Who would be responsible for the masterplans and infrastructure delivery plans/phasing plans (criteria 15. to 18.)?
- 13.37 Which of these plans would be site specific and which would be strategic allocation wide?
- 13.38 Is the potential funding from Homes England agreed (criterion 22.) and do these requirements need to be fulfilled for development to proceed on (any) of the sites under Policy SA4?
- 13.39 Do the Policy SA4 criteria provide appropriate safeguards for heritage assets and ecological designations that may be impacted?

- 13.40 Do the Policy SA4 criteria provide appropriate safeguards for riverboat moorings, or else for their affordable re-provision for their residents?
- 13.41 Under the 'Site-specific Information table', why is the number of new homes provided less than the overall number under the strategic allocation (criterion 2.) by approximately 200 units?
- 13.42 Under the 'Site-specific Information table', would site GN6 be delivered within the first 5 years of the plan period, as Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) indicates there would be no completions within the first 5 years?
- 13.43 Under the 'Site-specific Information table' and Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6), site SM16 is in part to be delivered beyond the plan period. Have these units been included, or excluded from, the Plan's housing supply figures?
- 13.44 Under the 'Site-specific Information table', will any of the sites involve the relocation of the existing uses, including employment and tenancies, and will this have a bearing on deliverability?
- 13.45 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA4, as set out in its Phase 1 Hearing Statement.

Policy SA5: Strood Town Centre and Surrounds

- 13.46 Is Policy SA5 consistent with Policy S20: Strood District Centre?
- 13.47 Is there duplication between Policy SA5 and Policy S20, and does this impact on the effectiveness of the policy?
- 13.48 How has the circa 1,079 capacity for this strategic allocation been derived (criterion 3.)?
- 13.49 Policy SA5 includes a number of supporting documents, including the Strood Waterfront Development Brief and a Town Centre Masterplan. Is it intended these documents would be elevated in status to become part of the development plan by virtue of their inclusion within the policy?
- 13.50 The supporting text (paragraph 14.6.2) states that the Strood Waterfront Development Brief is being revisited. What bearing does that have on Policy SA5?
- 13.51 At what stage would the transport interchange and bus corridor (criterion 6.) be provided and how would this relate to the development of this strategic allocation and individual sites?
- 13.52 At what stage would the railway station improvements (criterion 7.) be provided and how would this relate to the development of this strategic allocation and individual sites?
- 13.53 Are the transport improvements proposed for this strategic allocation shown on the Policies Maps?
- 13.54 Why does the increase in housing provision lead to a healthy living centre requirement at site SNF20 (criterion 9.) as this site is only allocated for circa 15 units under the Site-specific Information table'?
- 13.55 To what extent have healthcare requirements been considered in Policy SA5, including evidence?
- 13.56 Why do certain sites (criterion 14.) require a masterplan?
- 13.57 Do the criteria provide appropriate safeguards for heritage assets that may be impacted?
- 13.58 Under the 'Site-specific Information table', are any of these sites located in Flood Zone 3a/3b and if so, how are they justified? Will flood risk be adequately mitigated and does this have an impact on deliverability? Please also respond to the Environment Agency comments on flood risk for sites listed in Policy SA5, as set out in its Phase 1 Hearing Statement.

Policy SA6: Land West of Strood

- 13.59 How has the circa 1,280 capacity for this strategic allocation been derived (criterion 3.)?
- 13.60 Is the location of this strategic allocation consistent with national policy as regards encouraging modes of transport other than the motor car?
- 13.61 What ecology evidence has been used in the preparation of Policy SA6?
- 13.62 What affordable housing requirement (criterion 3. c) is the policy setting for this strategic allocation?
- 13.63 Why are proposals for this strategic allocation to be landscape based (criterion 4.)?
- 13.64 Who will be responsible for producing the green-blue infrastructure strategy (criterion 5.) for this strategic allocation?
- 13.65 Do the specific requirements for the strategic allocation set out in Policy SA6 (in particular, criteria 6. to 11.) concern only land in Medway?
- 13.66 Does Figure 12: Land West of Strood Concept Plan accurately show where infrastructure would be provided as regards Medway?
- 13.67 Has the provision of such infrastructure requirements been considered when the circa site capacity has been derived under Policy SA6?
- 13.68 How are these infrastructure requirements justified, in respect of evidence?
- 13.69 What proportion of the costs for infrastructure requirements under Policy SA6 are to be met by way of section 106 agreement, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6).
- 13.70 Is there an updated position as regards application dates, as per Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6)?
- 13.71 Who would be responsible for the delivery of the infrastructure delivery plan under the policy (criterion 14.)?
- 13.72 Are the 'other TBD' land uses that are referenced in sites SNF1 and SNF3 those which are listed under Appendix F Strategic Sites of the Council's Response to the Inspectors' Initial Queries (MLP/ED6) for SNF1 and SNF3 (and SR5)?
- 13.73 How did the Sustainability Appraisal (SA) (A3.1 to A3.3) consider SNF1, SNF3 and SR5, both individually and collectively? Please provide the related paragraph references in the SA.
- 13.74 Where the Statement of Common Ground with National Highways (MLP/ED20) (page 17, last paragraph of bullet point 'Site Allocations') refers to where any other site allocations which are located in proximity to the M2 Junction 1 should include this improvement, does this include the SA6 allocation and how is this reflected in the policy?
- 13.75 Can the M2 Junction 1 accommodate the additional traffic associated with the SA6 Allocation and please provide an associated update where matters are still under discussion with National Highways, as per the Statement of Common Ground with National Highways (MLP/ED20) (paragraph 2.8.2)?

Policy SA7: Capstone Valley

- 13.76 What evidence demonstrates that the scale of development proposed (up to 3,958 new homes) within Capstone Valley is justified having regard to the spatial development strategy and reasonable alternatives?
- 13.77 How were the allocated sites selected and what alternatives were considered and discounted?
- 13.78 How does Policy SA7 contribute towards the housing, infrastructure and environmental objectives of the Plan?
- 13.79 What evidence demonstrates that the proposed quantum and form of development can be accommodated without unacceptable harm to the landscape character of Capstone Valley?

- 13.80 How have the findings of the Landscape Character Assessment (B7), Green Infrastructure evidence and Sustainability Appraisal (A3.1 to A3.3) informed the allocation?
- 13.81 Are the green infrastructure requirements sufficiently clear and deliverable?
- 13.82 How will strategic green infrastructure and ecological corridors be secured and managed over the Plan period?
- 13.83 What transport evidence supports the allocation?
- 13.84 Is there sufficient capacity within the local highway network to accommodate the scale of development proposed?
- 13.85 What highway mitigation measures are required and how will they be funded and delivered?
- 13.86 What education, health, utilities and other infrastructure requirements have been identified as required and how will they be delivered?
- 13.87 Have cumulative impacts with other allocations been fully assessed?
- 13.88 How will infrastructure provision relating to Policy SA7 be phased alongside development?
- 13.89 Are there any significant viability, land ownership or deliverability constraints?
- 13.90 Are the site-specific allocations within Policy SA7 deliverable within the anticipated timescales set out in the housing trajectory?
- 13.91 Is Policy SA7 overall positively prepared, justified, effective and consistent with national policy?

Policy SA8: Hoo St Werburgh and Chattenden

- 13.92 What is the justification for directing a significant proportion of growth (circa. 4,700 new homes) to Hoo St Werburgh and Chattenden?
- 13.93 How does the allocation accord with the Plan's settlement hierarchy and spatial development strategy?
- 13.94 What reasonable alternatives were considered and why were they discounted?
- 13.95 What evidence demonstrates that the transport network can accommodate the scale of development proposed?
- 13.96 What are the key transport infrastructure requirements for Policy SA8?
- 13.96 What are the key dependencies for delivery of transport improvements and are they funded and committed?
- 13.97 Have National Highways and public transport providers confirmed that the proposed mitigation is sufficient?
- 13.98 What are the consequences to the delivery of SA8 if key transport infrastructure is delayed or does not come forward?
- 13.99 How have impacts on internationally and nationally designated ecological sites been assessed?
- 13.100 What mitigation measures are necessary in respect of recreation pressure, air quality and wider ecological impacts?
- 13.101 Is there sufficient certainty that these mitigation measures can be secured?
- 13.102 What evidence demonstrates that water resources and wastewater infrastructure can support the scale of development proposed?
- 13.103 What assessment has been undertaken of the impact of development on the historic environment, including Chattenden Conservation Area, listed buildings and archaeological interests?
- 13.104 What evidence demonstrates that the allocation is achievable and viable?
- 13.105 What are the principal risks to delivery and how have they been addressed?
- 13.106 How will the comprehensive development of the area be secured?

Policy SA9: High Halstow

- 13.107 What is the justification for the scale of development (up to 820 new homes) proposed at High Halstow?
- 13.108 How does the allocation support the overall spatial development strategy and the role of High Halstow within it??
- 13.109 What assessment has been undertaken of landscape character impacts and how has Policy SA9 sought to maintain the character and identity of High Halstow?
- 13.110 How will Policy SA9 avoid unacceptable harm to the character and identity of High Halstow?
- 13.111 Are the proposed landscape buffers and safeguards justified and effective and are they sufficient to avoid unacceptable coalescence, encroachment into the countryside or harm to local character?
- 13.112 What evidence demonstrates that local services, facilities and infrastructure can support the proposed growth set out within Policy SA9?
- 13.113 What infrastructure improvements are required and how and when will they be delivered?
- 13.114 What assessment has been undertaken regarding impacts on ecology and heritage assets?
- 13.115 Are the mitigation measures identified within the policy justified, effective and deliverable?
- 13.116 Are there any ownership, environmental or infrastructure constraints identified that could affect delivery of the scale of development proposed on the allocated sites within Policy SA9 (HHH26, HHH29 and HHH15)?
- 13.117 Are the component sites of SA9 available, suitable, viable and achievable within the anticipated timescales as set out in the housing trajectory?
- 13.118 What delivery assumptions concerning Policy SA9 underpin its position within the housing trajectory and are they realistic?

Policy SA10: Lower Rainham

- 13.119 What evidence demonstrates that the level of development at Lower Rainham (up to 863 new homes), as set out within Policy SA10, represents the most appropriate strategy when considered against reasonable alternatives?
- 13.120 What reasonable alternatives were considered and why were the allocated sites selected?
- 13.121 What role does Lower Rainham, and its component site allocations (RN9, RN17, RN23 and RN25) play in contributing to and delivering the Plan's wider development strategy?
- 13.122 How do the individual site allocations at RN9, RN17, EN23 and RN25 and the overall SA10 allocation relate to the existing urban area and settlement pattern?
- 13.123 Are the proposed development limits and site boundaries justified?
- 13.124 What evidence is there to demonstrates that the allocations in Policy SA10 can be developed both individually and cumulatively without unacceptable effects on landscape character?
- 13.125 How have heritage assets, their settings and archaeological interests informed the overall allocation within Policy SA10?
- 13.126 How will important views, green infrastructure assets and heritage interests be protected or enhanced?
- 13.127 Are the policy requirements within Policy SA10 sufficiently precise to secure those outcomes?
- 13.128 What transport improvements are required to support the development within the allocation?
- 13.129 How will sustainable travel choices be promoted?
- 13.130 Is the necessary infrastructure deliverable within the timescales envisaged?

- 13.131 Are there any significant constraints relating to viability, land ownership, flood risk, contamination or infrastructure provision?
- 13.132 Is the allocation set out in Policy SA10 capable of being delivered during the Plan period and as set out in the housing trajectory?

Policy SA11: Rural Settlements

- 13.133 What is the justification for the overall approach to growth in the rural settlements?
- 13.134 How does the distribution of growth, as set out in Policy SA11, relate to the settlement hierarchy and wider spatial development strategy of the Plan?
- 13.135 How were individual sites selected and what alternatives were considered?
- 13.136 Is the scale of growth proposed for each settlement proportionate to its role, function and level of services?
- 13.137 What evidence supports the distribution of development between the various settlements?
- 13.138 What assessment has been undertaken of cumulative impacts arising from the allocations across the rural settlements?
- 13.139 How have impacts on landscape character, biodiversity, heritage assets and the setting of settlements been assessed and taken into account?
- 13.140 Are mitigation measures identified within Policy SA11, in reference to Policies S2 and S3, effective and deliverable?
- 13.141 Can existing local infrastructure, services and facilities accommodate the proposed growth?
- 13.142 What improvements to existing infrastructure are required and how will they be secured?
- 13.143 Have the implications for highway safety and accessibility been adequately assessed?
- 13.144 Have education, healthcare and wastewater implications been adequately assessed and addressed?
- 13.145 Are all allocated sites within Policy SA11 available, suitable and achievable?
- 13.146 What evidence demonstrates that development can be delivered within the Plan period and in accordance with the housing trajectory?
- 13.147 Does Policy SA11 provide a sufficiently clear and effective framework for decision-making?

Policy SA12: Other Sites

- 13.148 What is the purpose of Policy SA12 and how do the allocations for development identified within it (up to 881 new homes) contribute towards the spatial development strategy of the Plan?
- 13.149 What methodology was used to identify and select the sites included within Policy SA12?
- 13.150 Were reasonable alternatives considered and, if so, on what basis were the selected sites preferred?
- 13.151 Are the boundaries of the individual allocations justified and clearly defined?
- 13.152 What evidence demonstrates that the allocated sites are suitable for the uses proposed?
- 13.153 Have all significant physical, environmental and infrastructure constraints been identified, adequately assessed and appropriate mitigation addressed?
- 13.154 Are there any site-specific constraints that could affect the deliverability of the allocations?
- 13.155 What assessment has been undertaken of landscape and townscape effects?
- 13.156 Are the policy requirements for the site allocations identified within Policy SA12 sufficiently clear to secure appropriate mitigation and enhancement measures?

- 13.157 What infrastructure is required to support the development proposed and how is this identified within the Plan?
- 13.158 How and when will the necessary infrastructure be delivered?
- 13.159 Are all the site allocations within Policy SA12 viable, suitable, available and deliverable within the Plan period?
- 13.160 Does Policy SA12 provide a sufficiently clear and effective framework for decision-making?

General Questions for Policies SA7 - SA12

- 13.161 Taking Policies SA7 to SA12 collectively, is there sufficient certainty that the necessary transport, utilities, water, wastewater, education, healthcare, green infrastructure and environmental mitigation measures will be delivered in step with development?
- 13.162 Is the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character, infrastructure provision and public services adequately understood and addressed?
- 13.163 Are any main modifications necessary to ensure the allocations within Policies SA7 to SA12 are effective, justified and consistent with national policy?

Policy SA13: Frindsbury Peninsula Opportunity Area

- 13.164 What is the intended role of the Frindsbury Peninsula Opportunity Area (FPOA) within the spatial development strategy for Medway?
- 13.165 What evidence supports the identification of the FPOA as a strategic opportunity location?
- 13.166 How does the allocation of the FPOA within Policy SA13 contribute towards the Plan's housing, employment and regeneration objectives?
- 13.167 How will comprehensive masterplanning and coordinated delivery be achieved across the FPOA? Will this be through the Frindsbury Peninsula Development Framework?
- 13.168 Are the policy requirements sufficiently clear regarding the expected form, scale and mix of development?
- 13.169 How will landownership and delivery arrangements affect implementation?
- 13.170 What assessment has been undertaken regarding impacts upon internationally, nationally and locally designated ecological sites?
- 13.171 How will impacts on the Thames, Medway and Swale Estuaries and Marshes habitat network be avoided, mitigated or compensated for?
- 13.172 What evidence demonstrates that biodiversity impacts can be satisfactorily addressed?
- 13.173 How have contamination, land stability and former industrial land-use issues been assessed?
- 13.174 What flood risk evidence supports the allocation?
- 13.175 Have the sequential and exception tests been applied appropriately?
- 13.176 How will future flood risk and climate change impacts be managed throughout the lifetime of development?
- 13.177 What assessment has been undertaken regarding impacts on designated and non-designated heritage assets?
- 13.178 How will important landscape, townscape and waterfront characteristics be protected and enhanced?
- 13.179 What transport evidence supports the level of development proposed?
- 13.180 What highway, public transport, walking and cycling improvements are required?
- 13.181 Is there sufficient certainty that the necessary transport infrastructure can be delivered?

- 13.182 What utilities, wastewater, healthcare, education and community infrastructure improvements are required?
- 13.183 What role will the FPOA play in delivering employment growth?
- 13.184 How does Policy SA13 balance residential redevelopment, regeneration objectives and the protection of employment functions?
- 13.185 What evidence informs the proposed distribution between employment and other land uses?
- 13.186 What are the principal barriers to delivery and how will they be overcome?
- 13.187 Is Policy SA13 sufficiently flexible to respond to changing market circumstances over the Plan period?

Policy SA14: Employment Sites

- 13.188 What role do the allocated employment sites in Policy SA14 play in meeting future employment land requirements?
- 13.189 How do the allocations in Policy SA14 support the economic strategy and growth objectives of the Plan?
- 13.190 What evidence supports the quantity and distribution of employment land proposed?
- 13.191 What methodology was used to identify and assess the allocated employment sites in Policy SA14?
- 13.192 Were reasonable alternative sites considered and why were the selected sites preferred?
- 13.193 Are the allocation boundaries justified and clearly defined on the Policies Map?
- 13.194 What evidence demonstrates a need for the allocated employment land throughout the Plan period?
- 13.195 How does the allocation strategy respond to identified demand across different employment sectors?
- 13.196 Is there sufficient flexibility within Policy SA14 to accommodate changing economic circumstances and market requirements?
- 13.197 Given the significant over supply of employment land available within Medway, how has the Council considered unused or underused employment land not allocated for employment in the Plan for other uses, including housing, and why has it not taken that approach?
- 13.198 What transport and infrastructure improvements are required to support the allocated employment sites set out within Policy SA14?
- 13.199 Are the sites accessible by sustainable modes of transport?
- 13.200 Can utilities, digital infrastructure and servicing requirements be accommodated?
- 13.201 What assessment has been undertaken of environmental constraints affecting the employment allocations in Policy SA14?
- 13.202 How have impacts on designated ecological sites, protected habitats and biodiversity been assessed?
- 13.203 What mitigation measures are required and are they deliverable?
- 13.204 How have landscape, heritage and amenity impacts been addressed?
- 13.205 In relation to the larger strategic employment allocations, what evidence demonstrates that they are capable of delivery within the Plan period?
- 13.206 Are there any significant ownership, infrastructure, access or viability constraints relating to employment allocations within Policy SA14?
- 13.207 How will the delivery of strategic employment sites be monitored throughout the Plan period?
- 13.208 Does Policy SA14 provide a sufficiently clear framework for determining planning applications?

- 13.209 Is Policy SA14 justified, effective and consistent with national planning policy relating to economic growth and employment development?

General Questions for Policies SA13-SA14

- 13.210 Taken together, do Policies SA13 and SA14 provide a justified and effective means of achieving the Plan's spatial development strategy?
- 13.211 Have the cumulative effects of these allocations on transport infrastructure, ecological interests, water resources, wastewater treatment capacity, healthcare provision, education facilities and other critical infrastructure been adequately assessed? If so, how has this been demonstrated?
- 13.212 Is there sufficient certainty that the infrastructure and necessary mitigation measures to support these allocations will be delivered in a timely manner?
- 13.213 Are any main modifications required to ensure that Policies SA13 and SA14 are effective, justified and consistent with national policy?

Matter 14: Delivery and Monitoring

Issues

Whether the Plan sets out a clear framework for the delivery and monitoring of its policies and proposals.

How will the effectiveness of the Plan and its policies and proposals be measured and assessed?

Questions

- 14.1 How will the effectiveness of the Plan's policies, the identified quantum of development, the associated infrastructure requirements and the Plan's spatial development strategy and strategic objectives be effectively monitored, managed and delivered?
- 14.2 Several policies in the Plan make reference to monitoring, measuring and assessing how effective the policy and the Plan as a whole are. How will the identified performance indicators and targets be regularly monitored, measured and assessed in the submitted Plan?
- 14.3 Are these performance indicators and targets sufficiently precise so as to be effective?
- 14.4 Are these indicators and targets easily and clearly measurable so as to appropriately assess the performance of the Plan and its policies?
- 14.5 How regularly will the performance of the submitted Plan and its policies against its strategic objectives be reviewed and what mechanisms will be in place to do this regular review and inform any necessary update to the Plan or its policies?

Inspectors Note:

The following questions relate to Matter 3 Meeting Housing Needs and, in particular, Gypsy, Traveller and Travelling Showpeople. We are aware that the Council is currently undertaking additional work regarding this, including possible consultation on potential site allocation work for relevant accommodation. As a result, it is likely that a further hearing will need to be held to discuss this following the Phase 2 Hearings and the completion of the Council's additional work. Notwithstanding this, we ask the following questions at this stage to provide an opportunity for our queries to be addressed and for key points and issues to be identified ahead of any future hearing session.

Matter 3: Meeting Housing Need (contd.)

Gypsy, Traveller and Travelling Showpeople

Issue

Whether the Plan meet the needs of the specific housing requirements of the Gypsy, Travellers & Travelling Showpeople communities and the approach taken is justified, effective and consistent with national policy.

Need and Supply

- 3.62 The Council's Gypsy and Traveller Note (MLP/ED8) (PDF pages 2 and 3, under question 27) refers to a recent supply of pitches from planning applications that it considers contributes to need. Are these consents all permanent and not restricted by personal permissions?
- 3.63 Please provide an update on the capacity of consented sites, as per the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17, paragraph 5.2.2).
- 3.64 The Council's Gypsy and Traveller Note (MLP/ED8) (PDF page 4, under question 27) states that the Council has identified land suitable for Gypsy and Traveller accommodation that is being used for wider residential needs, including the potential use of Compulsory Purchase Orders (CPO). Has consideration been given to the likelihood of CPO success as regards its effectiveness in bringing forward further Gypsy and Traveller sites?
- 3.65 Where the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17, paragraph 2.1.3) states that the three sites that were submitted during the Call for Sites 2022 were all deemed unsuitable, was need considered when that view was taken?
- 3.66 Do the sites that were considered in the review of sites in the Council ownership under the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17) include the site at Cuxton which is referred to in the supporting text to Policy T10 (paragraph 6.10.7)?
- 3.67 Please provide an update on the potential site allocation at Wigmore, following the Full Council meeting on 15 October 2026, as referred to in the Update On Gypsy And Traveller Accommodation Needs (MLP/ED28)?
- 3.68 Please also provide an update on the timescales for updating evidence and the site consultation for the potential site allocation at Wigmore.
- 3.69 Please explain why the Wigmore site is achievable, having regard to its economic viability, the capacity of the developer to complete and let or sell the development over a certain period, as per the assessment of achievability in the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17) (paragraph 3.3.8).
- 3.70 Please provide evidence of the discussions that the Council has had with the developers and landowners of the strategic development allocations over making provision for Gypsy and Traveller pitches that is referred to in the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17) (paragraph 4.1.1).
- 3.71 Why would brownfield regeneration in urban centres and waterfront sites not be suitable for Gypsy and Traveller pitches, as is stated in the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17) (paragraph 4.1.1)?
- 3.72 Why is there a concern about viability and impacts on integrating use for Gypsy and Traveller pitches in large scale 'bricks and mortar' developments on the wider strategic allocations in suburban and rural locations, as is stated in the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17) (paragraph 4.1.2)?
- 3.73 Where the Council's Gypsy and Traveller Note (MLP/ED8) (PDF page 4, under question 27) and the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17, paragraph 5.2.1) refers to site reconfiguration or space to increase capacity, has

consideration being given to whether this would be justified with regard to the effect on the living conditions of the existing residents of those site(s)?

- 3.74 In considering the various responses of the Council on Gypsy, Travellers and Travelling Showpeople site provision (MLP/ED6, MLP/ED8, MLP/ED17, MLP/ED18 and A, and MLP/ED28) please provide an update on whether the Council can now meet the projected need for Gypsy and Traveller pitches over the first five years of the Plan and over the Plan period?

Policy T10 Gypsy, Travellers & Travelling Showpeople

- 3.75 Why does Policy T10 not consider sites with a condition limiting them to a temporary period or a specified person(s) to be authorised, by way of the definition it gives at the end of the 'Safeguarding existing sites' section, or is that simply to ensure that permissions that are subject to temporary and/or personal permissions are not taken into account in supply calculations?
- 3.76 Under both the 'Safeguarding existing sites' and 'New Sites' sections of Policy T10, why must sites be 'well-screened' and is this consistent with national policy?
- 3.77 Are the criteria in the 'Safeguarding existing sites' section of Policy T10 (top of page 107) formatted as intended?
- 3.78 Under the 'New sites' section of Policy T10, how would the needs of Gypsy, Traveller and Travelling Showpeople' who do not meet the definition under national policy (first bullet point) be addressed?
- 3.79 Is the reliance on expansion of authorised sites under the 'New sites' section of Policy T10 (second bullet point) consistent with national policy, as well as with this sub section title?
- 3.80 Are the list of the location exclusions under the 'New sites' section of Policy T10 (third bullet point) consistent with national policy and positively prepared?
- 3.81 The Council's Response to the Inspectors' Initial Questions on Gypsy, Traveller and Travelling Showpeople (MLP/ED8) (PDF page 2, under question 26) refers to the need to update the supporting text to Policy T10 to reflect the Gypsy and Traveller Accommodation Assessment - Addendum (B11.2) as a minor modification. Why would it be a minor, rather than a main modification?
- 3.82 The Council's Response to the Inspectors' Initial Questions on Gypsy, Traveller and Travelling Showpeople (MLP/ED8) (PDF page 4 under question 27) and the Gypsy, Traveller and Travelling Showpeople Accommodation Sites Report (MLP/ED17, paragraph 5.2.1) refers to the potential for areas for expansion of existing Gypsy, Traveller and Travelling Showpeople sites. Do these sites need to be included in Policy T10 and shown on the Policies Map?
- 3.83 In also considering the Main Modifications that the Council has indicated it would wish to make to this policy, is Policy T10 therefore positively prepared, justified, effective and consistent with national policy?