

Examination of the Medway Local Plan 2041

Schedule of Matters, Issues and Questions Phase 1 Hearings

30 July 2026

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Introduction

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

Participants should be aware that the Council has published a number of additional documents to the Plan evidence base and examination documents 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 (version 1) for the 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 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 1 – Legal and Procedural Requirements

Issue

Whether the relevant legal and procedural requirements have been met in the preparation of the Plan and whether the Plan is legally compliant.

Questions

Legal and Procedural Compliance

- 1.1 How does the Council explain the steps it took to comply with the statutory requirements of Regulation 18 and Regulation 19 consultation?
- 1.2 In what ways were the consultation responses that were received taken into consideration during the preparation of the submitted Plan?
- 1.3 How has the Council ensured that the published Statement of Community Involvement (SCI) was applied throughout the plan-making process?

Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)

- 1.4 How have the likely environmental, social and economic effects of the Plan been adequately and appropriately assessed through the work of the SA and HRA?
- 1.5 The Plan engages with international nature sites, including Special Protection Areas (SPA) and RAMSAR. Please could the Council confirm and set out how there is legal sufficiency in the process of engagement within the plan-making process relating to such sites and an adequate evidence trail to support this.
- 1.6 How has the Plan been based on a sound process of SA and how has the SA, as set out in supporting evidence, provided an adequate and appropriate consideration and testing of reasonable alternatives to the development strategy approach presented in the submitted Plan?
- 1.7 How does the SA adequately and appropriately assess all sites identified within the Plan, particularly in relation to flooding and how is such an assessment considered sufficiently robust, justified and sound?
- 1.8 How has the submitted Plan been formulated on a sound HRA process and how is the Council's conclusion that a comprehensive appropriate assessment is not required justified?
- 1.9 How are the policies in the Plan reflective of the Submission Habitat Regulations Assessment (A4.1 to 4.3)?
- 1.10 Have Natural England's views been sought on the Submission Habitat Regulations Assessment (A4.1 to 4.3) and if so, how have they been considered?
- 1.11 Has the Integrated Impact Assessment (IIA) submitted been undertaken in accordance with all the relevant Regulations (including SA and HRA) and the National Planning Policy Guidance (NPPG)?
- 1.12 Overall, how is the IIA adequate in its expression of why the Plan's preferred strategy and policies were selected, as opposed to other alternatives?

Other Legal Requirements

- 1.13 Taken as a whole, does the Plan include strategic policies - or a spatial development strategy which contains policies – to address the identified strategic priorities of the

Plan area, in accordance with Section 19(1C) and (1D) of the Planning and Compulsory Purchase Act (PCPA)? If not, why?

- 1.14 How is the Plan legally compliant in terms of how it seeks to address climate change?
- 1.15 Does the Plan include policies designed to secure the development and use of land in the Borough which contributes to the mitigation of, and adaptation to, climate change as required by Section 19(1A) of the PCPA?
- 1.16 How has the Plan been prepared in accordance with the Council's Statement of Community Involvement (SCI) and how has it met the minimum consultation requirements in the relevant Regulations? How has the consultation carried out during the preparation of the Plan been adequate and appropriate?
- 1.17 How does the Plan accord with the Council's Local Development Scheme (LDS)
- 1.18 Is the geographical illustration of all relevant policies and proposals within the Plan adequately and correctly shown on the submission policies map?

Matter 2 - Vision, Spatial Development Strategy and Strategic Objectives

Issues

Whether the Plan identifies a clear Vision and Spatial Development Strategy for Medway that are positively prepared, justified, effective and consistent with national policy.

Whether the Strategic Objectives are clear, positively prepared, justified, effective and in accordance with national policy.

Questions

The Vision of the Plan

- 2.1 How does the Vision for the Plan express the long-term ambitions for Medway up to 2041?
- 2.2 In what ways does the Vision take account of identified local needs, opportunities and constraints?
- 2.3 Does the Vision align with other local, regional and national strategies and plans that are active in Medway? If so, what and how?

Spatial Development Strategy

- 2.4 What are the key factors that informed and shaped the selection of the spatial development strategy of the Plan over other reasonable approaches?
- 2.5 How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?
- 2.6 How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

Strategic Objectives

- 2.7 How have the strategic objectives been developed and what evidence has informed them?
- 2.8 How do the strategic objectives support the spatial development strategy and the policies set out in the Plan?

- 2.9 How does the Plan ensure that the strategic objectives are capable of being delivered within the Plan period?
- 2.10 The Plan sets out that the spatial distribution of new development within Medway is circa. 40% urban regeneration; circa 30% suburban and circa 30% rural (mainly on the Hoo Peninsula). Please could the Council explain, with reference to the evidence submitted, how and why this spatial distribution is the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.
- 2.11 In what way were reasonable alternative development strategies considered and assessed during the plan-making process?
- 2.12 How does the spatial development strategy address the requirements of different parts of Medway such as the Hoo Peninsula as well as the more urban areas?

Matter 3 – Meeting Housing Needs

Issues

Whether the policies and designations relating to meeting housing needs in the Plan are clear, positively prepared, justified, effective and consistent with national policy.

Whether the housing growth identified in the Plan is justified and deliverable.

Whether the Plan and its relevant policies provide an ongoing five-year supply of deliverable housing sites.

Whether the Plan and its policies provide for an adequate and appropriate mix of housing and sites.

Whether delivery mechanisms to meet housing needs are clear, justified and effective.

Questions

Housing Requirement

- 3.1 How has the housing requirement for the Plan period been assessed? What evidence underpins the housing requirement and how has national policy been applied in setting it?
- 3.2 How does the Plan demonstrate that the housing requirement is realistic and deliverable in light of the constraints identified in the evidence base?
- 3.3 The Council states a housing requirement of 1,636 dwellings per annum to 2041 (circa. 24,540 homes). Is this the Plan's minimum requirement? How it has been set and explain how flexibility and contingency in its delivery is provided.
- 3.4 Please could the Council clarify and confirm the Plan's housing requirement figure for adoption of the Plan, provide an explanation of how this is identified and the buffer applied to manage non-delivery risk.
- 3.5 The development proposed in the Plan is identified as meeting the full Local Housing Need and this is identified as the housing requirement figure. However, there does not appear to be a policy which sets out the housing requirement figure and identifies how the need would be met and distributed. The Council is asked to explain why this is the case.

Housing Supply

- 3.6 Does the Plan clearly set out the expected, 'planned-for' sources of housing supply to meet the identified housing requirement?
- 3.7 With regard to meeting housing need through an identified supply of land, particularly over the first five years of the Plan period, we note that the proposed housing trajectory appears to be outside of the Plan and is, in fact, within a separate Topic Paper (ref: B22.5). Why is this?
- 3.8 How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?
- 3.9 How does the Plan demonstrate the role of small sites / SMEs in housing supply and the robustness of any windfall assumptions?
- 3.10 How have identified constraints (environmental, highways, utilities, flood risk) been factored into site capacities and delivery timings? If they have not, why?
- 3.11 What mechanisms does the Plan identify to assess its performance and how it will respond to delivery underperformance (e.g. contingency, review triggers)?

Policy T2: Housing Mix

- 3.12 How has the Local Housing Needs Assessment (LHNA) informed the Plan's approach to housing mix, and what evidence demonstrates that the proposed mix of dwelling sizes, types and tenures reflects identified housing needs, demographic change and projected household formation throughout the Plan period?
- 3.13 What evidence demonstrates that the proposed housing mix requirements will remain appropriate throughout the Plan period to 2041, including in relation to an ageing population, specialist housing needs and potential changes in demographic or economic circumstances?
- 3.14 What evidence demonstrates that the proposed housing mix requirements are deliverable across strategic allocations, brownfield regeneration sites and windfall developments, and have developers, housebuilders and registered providers been engaged in testing the proposed approach?
- 3.15 How will housing mix requirements be applied and managed on large strategic sites delivered over extended periods, and what flexibility exists within the policy framework to respond to changing housing needs and market conditions?
- 3.16 To what extent have housing mix requirements been incorporated into the viability evidence, and what evidence demonstrates that they remain viable when considered alongside affordable housing, infrastructure contributions and other policy requirements? How will competing policy requirements be balanced where viability pressures arise?
- 3.17 How will the Council monitor the implementation of Policy T2, the delivery of the intended housing mix and what indicators and review mechanisms will be used to assess policy effectiveness? How will identified needs for specialist housing be translated into deliverable development proposals and completed units during the Plan period?

Policy T3: Affordable Housing

- 3.18 How has the need for affordable housing across Medway been identified, and what evidence supports the proposed affordable housing requirements, tenure mix and thresholds set out in the Plan?
- 3.19 How has the evidence on housing need, affordability, demographic change and local housing market conditions informed the affordable housing policy, and why is the proposed approach considered the most appropriate when assessed against reasonable alternatives?
- 3.20 What evidence demonstrates that the affordable housing requirements are deliverable across the range of development typologies anticipated during the Plan period, including strategic allocations, regeneration sites, brownfield sites and windfall developments?
- 3.21 To what extent have affordable housing requirements been tested through the viability evidence, and what evidence demonstrates that they remain viable when considered alongside infrastructure requirements, biodiversity net gain, climate change measures and other policy obligations?
- 3.22 Please provide a schedule setting out the anticipated affordable housing delivery by site and phase across the strategic allocations and explain any instances where delivery is expected to differ from policy requirements. How will affordable housing be secured on large, phased developments?
- 3.23 What flexibility exists within the policy framework to respond to changing market conditions, viability circumstances, government policy and local housing needs over the Plan period, and how will decisions be made where viability pressures arise?
- 3.24 How will affordable housing delivery and tenure provision be monitored throughout the Plan period, what intervention mechanisms are proposed if delivery falls below expectations, and how will the evidence base be reviewed to ensure the policy remains effective and justified?
- 3.25 What evidence is there that registered providers can absorb and manage the level of affordable housing anticipated by the Plan?
- 3.26 Why is the chosen affordable housing strategy the most appropriate when considered against reasonable alternatives and the available evidence base?

Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation

- 3.27 What evidence supports the identified need for supported housing, older persons' accommodation, nursing homes and residential care provision across the Plan period, and how have changing demographic trends, care models and patterns of need informed the policy approach?
- 3.28 How has the Council assessed the need for different forms of specialist accommodation, including extra-care housing, supported housing, residential care and nursing care, and what evidence demonstrates that the proposed approach is the most appropriate when assessed against reasonable alternatives?
- 3.29 What evidence demonstrates that the identified need for specialist accommodation will translate into deliverable development proposals and completed units during the Plan period, and can the Council identify the sites, locations, unit numbers and/or bedspaces expected to contribute towards meeting those needs?

- 3.30 How does the distribution of specialist accommodation align with the Plan's spatial strategy, and what evidence demonstrates that proposed locations provide appropriate access to healthcare, public transport, local services and community infrastructure?
- 3.31 To what extent has viability testing considered specialist accommodation products, including extra-care housing, supported housing and care homes, and what evidence demonstrates that policy requirements will not undermine delivery, particularly on strategic allocations and in conjunction with affordable housing and other policy obligations?
- 3.32 How will the Council monitor delivery of specialist accommodation throughout the Plan period, what intervention mechanisms are proposed if delivery falls below expectations, and what flexibility exists within the policy framework to respond to changing demographic trends, care models and market conditions?

Policy T5: Student Accommodation

- 3.33 What evidence supports the identified need for student accommodation over the Plan period, how has the Council engaged with higher education institutions and accommodation providers in assessing future requirements, and why is the proposed approach the most appropriate when assessed against reasonable alternatives?
- 3.34 How does Policy T5 contribute to the overall housing strategy of the Plan, including the delivery of mixed and balanced communities, and what relationship exists between student accommodation provision, HMOs and the wider housing market? In particular, to what extent would additional purpose-built student accommodation reduce pressure on conventional housing stock?
- 3.35 What evidence demonstrates that the identified need for student accommodation will translate into deliverable development proposals, and can the Council quantify the amount of accommodation expected to be delivered, identify where it will be accommodated, and provide an indicative delivery trajectory?
- 3.36 How does the policy ensure that student accommodation is directed to sustainable locations with appropriate access to higher education facilities, public transport, town centres, employment opportunities and community services, whilst avoiding unacceptable impacts on residential amenity and local communities?
- 3.37 What evidence demonstrates that educational institutions, developers and accommodation providers support the forecasts and delivery assumptions underpinning the policy, and how would the identified needs be met if anticipated schemes fail to come forward?
- 3.38 How will the delivery of student accommodation throughout the Plan period be monitored? What flexibility exists to respond to changing patterns of higher education demand and student numbers, and what intervention mechanisms are proposed if delivery falls below anticipated levels?

Policy T6: Mobile Home Parks

- 3.39 What evidence demonstrates a need for mobile home park provision within Medway during the Plan period, what contribution is it expected to make towards meeting housing needs (including the needs of older persons), and why is the proposed policy approach in Policy T6 the most appropriate when assessed against reasonable alternatives?

- 3.40 How does Policy T6 ensure that mobile home park development is directed to sustainable locations, and how have environmental constraints, flood risk, landscape considerations, accessibility to services and the wider spatial strategy informed the policy approach?
- 3.41 What evidence demonstrates that additional mobile home park provision is deliverable during the Plan period, including evidence of operator or landowner interest? How will identified needs be met if anticipated provision does not come forward?
- 3.42 Does Policy T6 provide an effective framework for securing appropriate living conditions and site standards, and how will the Council monitor delivery and effectiveness of the policy, review evidence of need, and respond if provision significantly exceeds or falls below expectations?

Policy T7: Houseboats

- 3.43 In terms of robust and up to date evidence, what need is there over the Plan period for houseboats as a specialist type of accommodation?
- 3.44 How would the policy seek to ensure that the need is met over the Plan period?
- 3.45 Is seeking to remove and dispose of vessels justified and effective (second bullet point of the policy)?

Policy T8: Houses of Multiple Occupation

- 3.46 Should the title of this policy be Houses In Multiple Occupation (HMOs)?
- 3.47 What is meant by an overconcentration of HMOs under Policy T8 (second bullet point) and how is this term defined?
- 3.48 Does Policy T8 seek to prevent the loss of any units suitable for family accommodation and, if so, how is this justified?
- 3.49 What is meant by excessive parking demands or traffic (fourth bullet point) and how is this term defined?
- 3.50 What level of family accommodation has been lost to HMOs (paragraph 6.8.3), in justifying this aspect of the policy?

Policy T9: Self-build and Custom Housebuilding

- 3.51 How does Policy T9 seek to ensure that the 430-plot need (paragraph 6.9.12) is met over the Plan period, in particular as one site is allocated (4 units)? In considering the level of need and the effectiveness of the policy, why were more site(s) not allocated?
- 3.52 Is a shorter timeframe for building plots (bullet point towards the top of page 102) justified and effective, as this does not seem to be a particular feature of Plan policies for other types of housing?
- 3.53 Where Policy T9 refers to 'Expanding/intensifying existing residential permissions', does this mean solely permissions for self-build and custom housing? If not, how could this be retrospectively applied to another type of housing which already has planning permission, in terms of the effectiveness of the policy?
- 3.54 Why does Policy T9 specifically refer to the role of 'Neighbourhood Plans', which does not seem to be a particular feature of Plan policies for other types of housing?

Policy T11: Small Sites and SME Housebuilders

- 3.55 How has the 60 dwellings (net) limit under Policy T11 been derived as regards maintaining the character and scale of the local area and the justification for the policy, and on the basis of what evidence?
- 3.56 Why is the minimum 5 unit threshold (paragraph 6.11.1) not included in the policy itself, in terms of being effective?
- 3.57 Is Policy T11 seeking to direct such development to any particular locations in Medway?
- 3.58 How does Policy T11 accord with national policy in that at least 10% of the housing requirement is to be on sites that are no larger than one hectare?
- 3.59 If a Small and Medium-sized Enterprises (SME) housebuilder proposed a site over 60 dwellings (net), how would this be considered under the Plan, if not Policy T11?
- 3.60 In terms of Policy T11 being effective and justified, was consideration given to including small sites and SME housebuilders criteria in a broader housing policy?
- 3.61 Is there a typo under the second bullet point, second line of Policy T11?

Matter 4 – Built Environment

Issue

Whether the Plan and its policies on the built environment are clear, positively prepared, justified, effective and consistent with national policy.

Questions

Policy T1: High Quality Design and Amenity

- 4.1 What evidence demonstrates that the Plan's design policies will secure development of a higher quality than would otherwise be achieved through the application of national policy and existing development management processes?
- 4.2 How have the Council's character assessments, urban design evidence and place-making studies informed the requirements of the policy, and how do those requirements respond to the distinct character of different parts of Medway?
- 4.3 Are the design requirements sufficiently clear and precise to provide certainty for applicants, decision-makers and local communities, whilst remaining flexible enough to accommodate differing site circumstances?
- 4.4 How will the policy ensure that strategic allocations and major regeneration sites deliver coherent, attractive and well-designed places rather than individual development parcels considered in isolation?
- 4.4 What evidence demonstrates that the design and amenity standards are deliverable and viable when considered alongside affordable housing, infrastructure, climate change and biodiversity requirements?
- 4.5 How does the policy ensure that all future occupiers will benefit from a high standard of amenity, including adequate daylight, sunlight, privacy, outlook, internal space, outdoor space and protection from noise and disturbance?
- 4.6 How have potential conflicts between achieving higher densities and maintaining acceptable living conditions been addressed within the policy framework?

- 4.7 What safeguards exist to ensure that proposals do not result in unacceptable impacts upon the amenity of existing residents through overlooking, overshadowing, overbearing effects, noise or other forms of disturbance?
- 4.8 How will the Council assess whether development proposals have successfully responded to local character whilst also encouraging innovation and high-quality contemporary design?
- 4.9 What mechanisms, including masterplans, design codes, design review processes or monitoring arrangements, will be used to secure and maintain high quality design throughout the Plan period?

Policy DM5: Housing Design

- 4.10 What evidence is there to show that Policy DM5 will secure higher quality residential development than would otherwise be achieved through national policy and existing development management processes?
- 4.11 How have local character assessments, design evidence and place-making studies informed the housing design requirements, and how do those requirements respond to the differing character of Medway's urban, suburban and rural areas?
- 4.12 Are the housing design requirements sufficiently clear, precise and flexible to ensure consistent decision-making whilst accommodating different site circumstances and forms of development?
- 4.13 How will Policy DM5 ensure that new homes provide a high standard of living accommodation and residential amenity, including matters such as internal space, outlook, privacy, daylight, amenity space and accessibility?
- 4.14 What evidence demonstrates that the housing design requirements are deliverable and viable when considered alongside affordable housing, infrastructure, biodiversity, climate change and other policy obligations?
- 4.15 Why is the proposed Housing Design policy the most appropriate approach to securing high quality homes across Medway, and what evidence demonstrates that it can be consistently delivered throughout the Plan period?

Policy DM6: Sustainable Design and Construction

- 4.16 What evidence is there to show that the Plan's Sustainable Design and Construction policy is necessary to address Medway's climate change objectives and will achieve outcomes beyond those secured through Building Regulations and national policy?
- 4.17 How have the Council's climate change evidence, carbon reduction studies and sustainability assessments informed the policy requirements, and why are the chosen standards considered the most appropriate?
- 4.18 What evidence demonstrates that the Sustainable Design and Construction requirements are deliverable and viable across all forms of development, including strategic allocations, regeneration sites and brownfield developments?
- 4.19 How does Policy DM6 ensure that new development incorporates measures to minimise carbon emissions, improve energy efficiency, increase resilience to climate change and promote sustainable resource use throughout the lifetime of the development?

- 4.20 Are the policy requirements sufficiently clear, flexible and capable of consistent implementation throughout the Plan period, particularly in light of potential changes to national policy, Building Regulations and emerging technologies?
- 4.21 Why is the proposed policy the most appropriate approach to achieving the Plan's climate change and sustainability objectives, and what evidence demonstrates that it can be delivered consistently and viably across Medway throughout the Plan period?

Policy DM7: Shopfront Design and Security

- 4.22 What evidence demonstrates that the proposed shopfront design and security requirements in Policy DM7 are necessary to protect and enhance the character, appearance and vitality of Medway's centres?
- 4.23 How have townscape assessments, conservation area appraisals, heritage evidence and local character studies informed the specific design requirements for shopfronts?
- 4.24 How does Policy DM7 balance the need for attractive and active shopfronts with the legitimate security requirements of businesses, particularly in relation to shutters, grilles, lighting and surveillance measures?
- 4.25 Are the policy requirements sufficiently clear and precise to enable applicants and decision-makers to determine what forms of shopfront alterations and security measures will be acceptable, particularly within conservation areas and other heritage settings?
- 4.26 What evidence is there that Policy DM7 will be effective and support the vitality and attractiveness of Medway's centres whilst ensuring that security measures do not result in harmful impacts on the public realm, visual amenity or perceptions of safety?
- 4.27 Why is the proposed Shopfront Design and Security policy the most appropriate approach to securing attractive, active and safe shopping frontages across Medway, and how will it be applied consistently and effectively throughout the Plan period?

Policy DM8: Advertisements

- 4.28 What evidence demonstrates that Policy DM8 concerning advertisements is required to protect the character, appearance and visual quality of Medway's urban areas, town centres, conservation areas and other sensitive locations?
- 4.29 How has the requirement for this policy been supported by evidence and how has that evidence informed the policy requirements relating to the design, scale, illumination and siting of advertisements?
- 4.30 Are the policy criteria sufficiently clear and precise to enable applicants and decision-makers to determine what forms of advertisement will be acceptable in different parts of Medway?
- 4.31 How does the policy balance the commercial need for advertising and business visibility against the need to protect visual amenity, heritage significance and the quality of the public realm?
- 4.32 What evidence demonstrates that Policy DM8 will adequately address the impacts of illuminated and digital advertisements on visual amenity, heritage assets, residential amenity and public safety throughout the Plan period?
- 4.33 Why is the proposed Policy DM8 the most appropriate approach to managing advertising within Medway, and what evidence is there to show that it will effectively

safeguard visual amenity and public safety whilst supporting the vitality and viability of centres?

Policy DM9: Heritage Assets

- 4.34 What evidence demonstrates that Policy DM9 concerning Heritage Assets provides an appropriate framework for conserving and enhancing the significance of Medway's designated and non-designated heritage assets?
- 4.35 How have heritage assessments, conservation area appraisals, Historic England advice and other evidence informed the approach both in Policy DM9 and the Plan?
- 4.36 How does the Plan, generally and specifically through Policy DM9, ensure that the significance and setting of heritage assets have been properly considered in accommodating the scale of growth proposed over the Plan period?
- 4.37 Are the policy requirements within Policy DM9 sufficiently clear and effective to guide decision-makers when balancing heritage impacts against the need for new housing, employment development and regeneration?
- 4.38 What evidence shows that Policy DM9 will successfully secure the conservation, enhancement and, where appropriate, regeneration of heritage assets throughout the Plan period?
- 4.39 Why is Policy DM9, as proposed, the most appropriate strategy for managing change within Medway's historic environment, and how is it demonstrated that it will effectively conserve heritage significance whilst accommodating the development needs of Medway?

Policy S9: Star Hill to Sun Pier

- 4.40 What support is there to show that Policy S9 is necessary and that the proposed policy framework is the most appropriate strategy for securing the regeneration and enhancement of the area?
- 4.41 How have other documents such as heritage assessments, conservation area appraisals, townscape studies and regeneration evidence informed the policy requirements and the vision for the Star Hill to Sun Pier corridor?
- 4.42 What evidence is there to demonstrate that the scale and type of development envisaged by the policy are deliverable throughout the Plan period?
- 4.43 How will Policy S9 ensure that new development and regeneration proposals conserve and enhance the significance of heritage assets, whilst also supporting economic growth, active uses and investment within the area?
- 4.44 What mechanisms will be used to secure the delivery of the policy's objectives, and how will the Council monitor whether the anticipated environmental, economic and townscape improvements are being achieved through Policy S9?
- 4.45 Why is Policy S9 considered to be the most appropriate and effective means of securing the long-term regeneration, heritage enhancement and economic vitality of this important gateway area, and what support is there to suggest that its objectives are capable of being delivered during the Plan period?

Policy DM10: Conservation Areas

- 4.46 What is there to support the approach that Policy DM10 provides an effective framework for preserving or enhancing the character and appearance of Medway's conservation areas?
- 4.47 How have Conservation Area Appraisals, Management Plans and other heritage evidence informed the policy requirements and the identification of key issues affecting individual conservation areas?
- 4.48. How does the Plan and specifically Policy DM10, ensure that the proposed scale of development and regeneration can be accommodated without causing harm to the significance, character or appearance of conservation areas?
- 4.49 Are the policy requirements sufficiently clear and effective to guide decision-makers when balancing heritage considerations against the need for housing, employment growth, town centre regeneration and other development objectives?
- 4.50 What methods and levers will be used to secure enhancement opportunities within conservation areas and to address areas identified as being at risk from neglect, inappropriate development or incremental change?
- 4.51 Why is Policy DM10 the most appropriate approach to preserving and enhancing the special character and appearance of Medway's conservation areas, and what is there to demonstrate that the policy will remain effective whilst accommodating the growth and regeneration envisaged by the Plan?

Policy DM11: Scheduled Monuments and Archaeological Sites

- 4.52 What evidence is there to show that Policy DM11 provides an appropriate framework for the protection, conservation and enhancement of Scheduled Monuments and archaeological sites across Medway?
- 4.53 How have archaeological assessments and other heritage evidence informed the Plan's spatial strategy, site allocations and development requirements, particularly in locations where archaeological remains are known or likely to be present?
- 4.54 How does the Plan, and Policy DM11 in particular, ensure that the significance and settings of Scheduled Monuments are appropriately considered where major development, regeneration or infrastructure proposals are proposed nearby?
- 4.55 Are the requirements of Policy DM11 sufficiently clear and effective to ensure that archaeological investigation, recording, preservation and mitigation measures are undertaken where appropriate before development occurs?
- 4.56 What is there to indicate that the proposed policy approach will successfully conserve archaeological significance whilst allowing sustainable development to come forward throughout the Plan period?
- 4.57 Why is the proposed policy the most appropriate approach to safeguarding Medway's Scheduled Monuments and archaeological resource, and how have archaeological interests appropriately informed both the spatial strategy and the allocation of development sites within the Plan?

Matter 5 – Green Belt

Issues

Whether the approach to the Green Belt is consistent with national policy.

Whether there are exceptional circumstances to justify altering Green Belt boundaries.

Whether the approach adequately and effectively protects the remaining areas of the Green Belt.

Questions

Policy S7: Green Belt

- 5.1 Have the proposed Green Belt boundaries under Policy S7 been defined clearly, using physical features that are readily recognisable and likely to be permanent, following on from the Green Belt Review (B8)?
- 5.2 Noting the key characteristics of openness and permanence and the five purposes of the Green Belt, is the Council satisfied that the Green Belt boundaries under Policy S7 will not need to be altered at the end of the Plan period?
- 5.3 Is Policy S7 (first paragraph) consistent with national policy on Green Belt where it refers to the coalescence of settlements?
- 5.4 Is Policy S7 (third paragraph) consistent with national policy where it states there will not be inappropriate development in the Green Belt?
- 5.5 Why does the Green Belt Note (MLP/ED7) (page 7) indicate that Green Belt land releases concern only parcels of land associated with the land west of Strood allocation, when the Appendix 1 to that note indicates a number of other Green Belt releases?
- 5.6 Why was the 2018 Green Belt Review used as the starting point for the Council's Green Belt Review (B8), as stated in the Green Belt Note (MLP/ED7) (page 4), as the approach set out in the National Planning Policy Framework 2024 and the Planning Practice Guidance February 2025 were published after this earlier Green Belt review?
- 5.7 Why is the Green Belt Review (B8) structured differently from the draft version as is set out in the external critique? (MLP/ED10, Appendix A1 and A2)?
- 5.8 Were any of the changes that the external critique (MLP/ED10, Appendix A1 and A2) recommended not taken up in the Green Belt Review (B8) and if so, why?
- 5.9 Is how the Green Belt Review (B8) deals with villages under Green Belt Purpose B consistent with national policy, as this was a matter raised in the external critique (MLP/ED10, Appendix A1 and A2)?
- 5.10 What are the differences between the methodologies that have been engaged by the Council and Gravesham Borough Council in the respective Green Belt reviews, given that the proposed respective releases at Land west of Strood and Chapter Farm lie adjacent to one another.
- 5.11 As the Green Belt Note (MLP/ED7) (page 9) sets out that the release of land at Chapter Farm in Gravesham Borough Council would need to come forward for there to be exceptional circumstances to justify the release of land west of Strood, is there a clear risk that such exceptional circumstances may not be demonstrated, especially as Gravesham is not as advanced in its Local Plan preparation as the Council?

- 5.12 Are there any other matters that the Council would wish to draw our attention to as regards the exceptional circumstances for the release of Green Belt land to the west of Strood?
- 5.13 Why do potential traffic congestion issues in itself lead to not releasing Green Belt land in the Medway Valley and why does the Council rely on the Transport Assessment for the Lower Thames Crossing in this regard (as set out in the Green Belt Note (MLP/ED7) (page 7), rather than the transport assessment work for the Local Plan?
- 5.14 Is the proposed Green Belt boundary for Parcel 1: Rochester Football Club correct, as it appears to cut across the sports facility as shown in Appendix 1 to the Green Belt Note (MLP/ED7)?
- 5.15 Are there any other matters that the Council would wish to draw our attention to as regards the methodology for the Green Belt Review (B8)?
- 5.16 Also having regard to the Council's response to the Inspector's initial questions (MLP/ED6) and the subsequent Green Belt Note (MLP/ED7) and Response to the Inspector's Next Steps (MLP/ED10), is Policy S7 based on robust and up to date evidence?
- 5.17 Is Policy S7 therefore positively prepared, justified, effective and consistent with national policy?

Matter 6: Natural Environment

Issues

Whether the Plan and its relevant policies are clear, positively prepared, justified, effective and consistent with national planning policy particularly relating to the mitigation of, and adaptation to, climate change.

Whether the Plan and its relevant policies adequately and effectively protect and enhance biodiversity interests and valued landscapes.

Whether development is being directed away from areas at the highest risk of flooding.

Whether the Plan and its relevant policies adequately and effectively deal with pollution-control related matters.

Questions

Policy S1: Planning for Climate Change

- 6.1 Where Policy S1 refers to development making demonstrable contributions to net zero emissions, what does this mean in practice and how will this be measured?
- 6.2 Why has the Plan not sought to apply specific energy efficiency and carbon saving requirements for development?
- 6.3 Has Policy S1 been prepared having regard to the viability of potential development?
- 6.4 Is Policy S1 therefore sufficiently flexible to be effective where viability, or any other material consideration, are considered?
- 6.5 Is Policy S1 consistent with how national planning policy seeks to meet the challenge of climate change?
- 6.6 Why is the need to separate rainwater from wastewater a particular strategic issue for Medway (paragraph 4.2.8)?

Policy S2: Conservation and Enhancement of the Natural Environment

- 6.7 Would the policy be effective with its length, the number of biodiversity and landscape matters that it covers and as a number of subsequent strategic policies in this chapter return to the same matter?
- 6.8 What other 'areas' (second paragraph of the policy) has the Kent and Medway Local Nature Recovery Strategy identified? Please also explain the relationship of this document to Policy S2, also as it appears not to be complete (paragraph 4.3.2).
- 6.9 Where the policy refers to where development will only be permitted where it demonstrates that it will protect and enhance the natural environment, biodiversity and landscape interests, is this consistent with national policy?
- 6.10 Why does the Biodiversity Net Gain (BNG) part of this policy refer to specifically enhancements in the built environment, as opposed to all environments?
- 6.11 Is the BNG measurable net gain approach reflective of guidance in the National Landscape?
- 6.12 How does this policy (or other policy in this chapter) address any potential impacts on the North Downs Woodland Special Area of Conservation (SAC) south of Lidsing?

Policy S3: North Kent Estuary and Marishes Designated Sites

- 6.13 Is the policy reflective of the Submission Habitat Regulations Assessment (HRA) (A4.1 to 4.3), as the HRA was published around the same time as the Plan was submitted for examination?
- 6.14 Does the Council's response to our initial questions (MLP/ED6) (page 2) states that a fuller response dealing with the Conservation of Habitat and Species Regulations 2017 will be provided as soon as possible have any bearing on this policy?
- 6.15 How has the 16 metres distance under the policy (fourth paragraph of the policy) for requiring greater mitigation measures been derived?
- 6.16 How does seeking mitigation and avoidance measures outside of the 6 kilometre (km) Zone of Influence (fifth paragraph of the policy) from the Strategic Access Management and Monitoring Strategy (SAMMS) accord with development within the 6 Km Zone of Influence these designated sites having to make a tariff contribution (second paragraph of the policy)?
- 6.17 What does 'larger schemes' mean, in the fifth paragraph of Policy S3?
- 6.18 How is 'development with potential for urbanisation effects' (seventh paragraph of the policy) defined for the purposes of Policy S3?
- 6.19 Where Policy 3 refers to 'project level applications' (last paragraph), what does this mean?
- 6.20 Would the policy be effective in terms of what it is seeking to achieve, in reading the various paragraphs together?

Policy S4 Landscape Protection and Enhancement

- 6.21 Where Policy S4 refers to development retaining the separation of settlements and containing urban sprawl (first and third paragraphs), why is this a landscape matter?
- 6.22 Does Policy S4 seek to use landscape protection to employ a strategic gap approach between settlements/development?

- 6.23 Is the approach to development under Policy S4 in and alongside the undeveloped coast (fifth paragraph) positively prepared and consistent with national policy as regards landscape?
- 6.24 Is Policy S4 justified by up-to-date robust and clear evidence as the supporting text (paragraph 4.5.13) refers to the draft Green and Blue Infrastructure Framework?

Policy S5: Securing Strong Green and Blue Infrastructure

- 6.25 How is Policy S5 distinct from Policy S2, and therefore effective, as it seems to concern similar biodiversity and landscape matters?
- 6.26 Where Policy S5 refers to major new development proposals (fourth paragraph), how is this defined?
- 6.27 Please provide an update on the final version of the Green and Blue Infrastructure Framework, as Policy S5 also appears to draw on a draft version of this document.
- 6.28 How is it intended that the final version of the Green and Blue Infrastructure Framework will be reflected in this policy?
- 6.29 How would Policy S5 result in networks that are strategically planned and that spaces and places are connected, which are identified key features of green infrastructure (paragraph 4.6.2), especially for development on non-strategic sites?
- 6.30 Why does the policy appear to largely focus on green, rather than blue, infrastructure? Please also explain why blue infrastructure assets are not shown on the Policies Maps.

Policy S6: Kent Downs National Landscape

- 6.31 Is Policy S6 consistent with national policy in respect of the level of protection which it applies to the national landscape for considering development proposals?
- 6.32 Are the criteria which are set out in Policy S6 consistent with the objectives of the Kent National Downs Landscape?
- 6.33 Does all development within the national landscape under Policy S6 need to be accompanied by a landscape assessment/landscape visual impact assessment, or only development which is of a defined scale?

Policy DM1 Flood and Water Management

- 6.34 Is Policy DM1 consistent with national policy and how it deals with flooding, in particular tidal flooding, and the sequential test, and how has this informed the allocation of sites including those in Flood Zone 3?
- 6.35 Is Policy DM1 reflective of the Strategic Flood Risk Assessment (SFRA) (B6.1 to 6.5), as SFRA was published in November 2025?
- 6.36 Where there is reference to an updated SFRA (paragraph 4.8.24) to inform site allocations going forward, is this the SFRA (November 2025) (B6.1 to 6.5)?
- 6.37 Have the Environment Agency's views been sought on the SFRA (B6.1 to 6.5)?
- 6.38 How is it intended the emerging Flood Defence Strategy, referred to in the Council's response to the Inspectors next steps (MLP/ED10) (page 3), would be reflected in this policy?
- 6.39 What does 'coastal squeeze' (Policy DM1 criterion towards the top of page 52 of the Plan) mean and what would be the Environment Agency's role in this?

- 6.40 How would obligations/S106 agreements be used to support flood risk works (last paragraph under 'Flood Risk Management' section of Policy DM1)?
- 6.41 Under the 'Water Supply' section of the policy, how are Groundwater Source Protection Zones and Principal Aquifers defined for the purposes of the policy and what does a 'suitable' risk assessment mean?
- 6.42 Is foul water drainage and wastewater a matter for the Plan and therefore justified, or else solely for statutory undertakers?
- 6.43 How does the Plan have a role in determining the acceptability of flood risk in relation to emergency planning capability (paragraph 4.8.4)?

Policy DM2: Contaminated Land

- 6.44 Is it intended that Policy DM2 covers land stability matters (end of the first paragraph of the policy)? If so, please clarify what is proposed in that respect and what the sources of land stability are in Medway.
- 6.45 Is Policy DM2 consistent with national policy?

Policy DM3: Air Quality

- 6.46 Is Policy DM3 reflective of the HRA, as regards air quality modelling (A4.1 to 4.3), as the HRA was published in December 2025?
- 6.47 Is the policy consistent with national policy, particularly as it refers to the Council's own guidance (third paragraph of the policy)?
- 6.48 Is there a particular reason why there is specific reference to the Four Elms Air Quality Action Plan (paragraph 4.10.6), as opposed to any other of the Air Quality Management Areas?
- 6.49 Why is the management of air pollution a cross-boundary issue (paragraph 4.10.8) and how does Policy DM3 reflect this in terms of the effectiveness of the policy? Please include any discussions which have taken place with neighbouring Local Planning Authorities or other relevant bodies.

Policy DM4: Noise and Light Pollution

- 6.50 Why have noise and light pollution been put together into a single policy?
- 6.51 Why does Policy DM4 refer to significant adverse effects in the first paragraph and then adverse effects in the bullet points in the next paragraph?
- 6.52 Is Policy DM4 justified and based on up-to-date evidence, as it states that the format and range of evidence will be agreed on a case-by-case basis (third paragraph of the policy)?
- 6.53 Why is a Landscape and Visual Impact Assessment a matter for this policy (fourth paragraph of the policy), rather than Policy S2 or Policy S6, and why is it relevant to non-landscape designations?
- 6.54 Is dark skies a light pollution consideration for this policy, or elsewhere in the Plan?
- 6.55 Is it intended that Policy DM4 covers vibration matters? If so, please clarify what is proposed in that respect.
- 6.56 How does Policy DM4 deal with any mitigation which might be required for lighting?
- 6.57 Where the Institution of Lighting Professionals guidance as regards zones has been applied to Medway (Table 1), please explain how these have been defined under the

table as regards the zones and where they apply in Medway? Should the table be contained within the policy itself?

- 6.58 How does Table 1 cater for types of development where high levels of light are required and are exempt from statutory nuisance (paragraph 4.11.7)?

Matter 7 – Economic Development

Issues

Whether the plan and its policies on employment needs and economic development are clear, positively prepared, justified, effective and consistent with national policy. Whether the employment land strategy and allocations in the Plan align with the evidence base and are deliverable.

Questions

General

- 7.1 What is the identified employment need of Medway over the Plan period and is this clearly defined within the Plan?
- 7.2 How has it been demonstrated that sufficient land is identified within the Plan to meet the differing short-term and long-term economic development and employment needs of Medway over the Plan period?
- 7.3 How is the approach taken in the preparation of the Plan in this regard justified, effective and consistent with national policy?

Policy S10: Economic Strategy

- 7.4 Chapter 7 of the Plan sets out an employment strategy (protect, modernise, allocate new) supported by needs evidence (the Employment Land Need Assessment – ELNA). How does the Council demonstrate that the scale, type, location and phasing of employment land proposed matches market demand, infrastructure constraints and requirements and the future economic needs of Medway?
- 7.5 Is the amount of employment provision in terms of land (and potential jobs) and the proposed distribution of such, as set out in the Plan, demonstrated to be sufficient and available throughout the Plan period?
- 7.6 How has the need for employment land been identified and quantified?
- 7.7 What evidence demonstrates that the proposed employment sites and economic development opportunities are deliverable, and that the necessary infrastructure, investment and market demand exist to support their development?
- 7.8 How does the Economic Strategy respond to likely changes in the economy during the Plan period, including shifts in employment sectors, technology, working practices and business space requirements?
- 7.9 How will the Council monitor the effectiveness of the Economic Strategy and what intervention mechanisms exist if job growth, employment land delivery or investment levels fall materially below those anticipated?
- 7.10 Why is the Economic Strategy the most appropriate strategy for supporting sustainable economic growth in Medway, and what evidence demonstrates that the forecast employment growth, employment land provision and associated infrastructure are justified, deliverable and capable of being achieved throughout the Plan period?

Policy S11: Existing Employment Provision

- 7.11 What evidence demonstrates that the quantity, distribution and designation of existing employment land and premises proposed to be retained are sufficient to meet Medway's future economic needs throughout the Plan period?
- 7.12 How has the Council assessed the suitability, availability, market attractiveness and long-term economic function of existing employment sites when determining which sites should be protected, intensified, regenerated or released?
- 7.13 What evidence demonstrates that the loss of existing employment sites to alternative uses, including housing and mixed-use development, would not undermine the delivery of the Plan's Economic Strategy?
- 7.14 How does the policy provide sufficient flexibility to respond to changing business needs, employment sectors, working practices and market conditions over the Plan period to 2041?
- 7.15 How does the Plan address the needs of existing local businesses and key economic sectors?
- 7.16 What monitoring indicators and review mechanisms will the Council use to assess the continued performance and suitability of existing employment areas, and how will the Council respond if evidence demonstrates an over- or under-supply of employment land?
- 7.17 Are all existing employment sites accurately reflected on the policies map?

Policy S12: New Employment Sites

- 7.18 What evidence demonstrates that the quantity, type and location of new employment sites proposed by the Plan are sufficient to meet Medway's forecast economic and employment needs throughout the Plan period?

Note: For clarity, we ask the Council to provide a schedule of new employment allocations with use classes, indicative floorspace, access strategy and delivery prospects, including any displacement effects from the Frindsbury Peninsula change.

- 7.19 How were the proposed new employment sites selected, and why are they considered the most appropriate locations when compared with reasonable alternatives?
- 7.20 What evidence demonstrates that the proposed employment allocations are deliverable, including landowner support, market demand, infrastructure provision and the absence of significant constraints?
- 7.21 How has the Council ensured that the infrastructure necessary to support the new employment sites, including transport, utilities and digital connectivity, will be delivered in a timely manner?
- 7.22 If one or more strategic employment allocations fail to come forward as anticipated, what flexibility exists within the Plan to ensure that economic growth objectives can still be achieved?
- 7.23 How will the Council monitor the take-up, delivery and performance of the new employment allocations, and what contingency measures exist if employment land comes forward more slowly than anticipated?

Policy T12: Learning and Skills Development

- 7.24 What is there to show that the Learning and Skills Development policy is justified and responds to the current and future skills needs of Medway's economy?
- 7.25 How has the Council worked with employers, educational institutions, training providers and other stakeholders to identify future workforce requirements and inform the policy approach?
- 7.26 What mechanisms will ensure that the policy translates into measurable skills and employment outcomes, particularly in relation to major development sites and strategic growth locations?
- 7.27 How does the policy contribute to the delivery of the Economic Strategy and support the workforce needed to realise the employment growth anticipated by the Plan? To what extent does delivery of the Economic Strategy depend upon successful implementation of the Learning and Skills Development policy, and how has this relationship been assessed?
- 7.28 How will the Council monitor the effectiveness of the policy, and what intervention measures are available if anticipated learning, training and skills outcomes are not achieved?
- 7.29 Are there specific targets, commitments or partnerships which provide confidence that the policy's objectives can realistically be achieved?

Policy T13: Tourism, Culture and Visitor Accommodation

- 7.30 What is the evidence that informs Policy T13 on tourism, culture and visitor accommodation and how has such evidence influenced the policy for it to be justified, effective and consistent with national policy?
- 7.31 What is there to show that the proposed approach to tourism, culture and visitor accommodation is justified and reflects the current and future needs of Medway's visitor economy?
- 7.32 How does the policy support and complement the Economic Strategy, heritage assets, cultural infrastructure and regeneration objectives?
- 7.33 What evidence demonstrates that there is a quantitative or qualitative need for additional visitor accommodation within Medway, and how has this informed the policy approach?
- 7.34 How will the Council ensure that the tourism and visitor accommodation opportunities anticipated by the policy are deliverable, particularly where delivery relies upon private investment, regeneration projects or infrastructure improvements?
- 7.35 Are the locations where visitor accommodation is encouraged consistent with the spatial strategy, accessibility objectives and heritage considerations of the Plan?
- 7.36 What is the evidence to demonstrate that the necessary infrastructure, cultural assets and visitor attractions will be in place to support the level of tourism growth envisaged by Policy T13?
- 7.37 How will the effectiveness of the policy be monitored, and what mechanisms are available if anticipated tourism growth or visitor accommodation delivery does not occur?

Policy S14: Supporting Medway's Culture and Creative Industries

- 7.38 What evidence shows that the culture and creative industries sector represents a significant component of Medway's current and future economy, and how has this evidence informed the policy approach?
- 7.39 How does Policy S14 contribute to, and support, the wider Economic Strategy, tourism strategy, regeneration objectives and town centre strategy set out elsewhere in the Plan?
- 7.40 What evidence demonstrates that existing and proposed cultural and creative industry spaces are sufficient, deliverable and capable of meeting the needs of the sector throughout the Plan period?
- 7.41 How will Policy S14 protect, support and expand cultural and creative uses whilst balancing competing pressures for housing, commercial development and regeneration?
- 7.42 How has engagement with cultural organisations, creative businesses, educational institutions and regeneration partners informed the policy?
- 7.43 What role is the culture and creative industries sector expected to play in supporting Medway's economic growth, tourism offer and place-making objectives?
- 7.44 Are there specific locations, clusters or regeneration areas where the Council expects the sector to grow, and what evidence supports this approach?
- 7.45 What mechanisms will ensure delivery of the policy's objectives, and how will the Council monitor whether the culture and creative industries sector is growing in the manner anticipated by the Plan?

Policy T14: Rural Economy

- 7.46 How does the Plan, and Policy T14 specifically, support rural economic activity?
- 7.47 What evidence demonstrates that Policy T14 is justified and responds to the current and future needs of rural businesses, agriculture, land-based industries and rural enterprise within Medway?
- 7.48 How has the Council assessed the need for new rural employment opportunities, diversification schemes and business growth within rural areas, and how have those findings informed the policy?
- 7.49 How does Policy T14 balance support for rural economic growth with the need to protect the countryside, Green Belt, landscape character, heritage assets and environmental designations?
- 7.50 What evidence is there to show that the forms of development supported by Policy T14 are deliverable and capable of contributing meaningfully to the Plan's wider Economic Strategy?
- 7.51 What role is the rural economy expected to play within the wider Economic Strategy, and what evidence supports that contribution?
- 7.52 How does the policy support farm diversification, rural enterprise and tourism whilst avoiding unacceptable impacts on the countryside and rural communities?
- 7.53 What evidence is there to show that infrastructure constraints, including transport and digital connectivity, will not undermine delivery of the policy's objectives?
- 7.54 Are the policy criteria sufficiently clear and flexible to support innovation and changing business practices within the rural economy over the Plan period to 2041?

- 7.55 How will the Council monitor the effectiveness of the policy and determine whether it is successfully supporting rural employment, business diversification and economic growth throughout the Plan period?

Matter 8 – Retail, Town Centres and Leisure

Issue

Whether the Plan and its policies relating to retail, town centres and leisure are clear, positively prepared, justified, effective and consistent with national policy.

Questions

Policy S15: Town Centres Strategy

- 8.1 Is taking a sequential approach to community uses, tourism and creative uses in particular (fourth bullet point of the policy) consistent with national planning policy?
- 8.2 What does in-centre and edge of centre locations will be explored for further provision of employment uses (sixth bullet point of the policy) mean?
- 8.3 How has the Medway Retail and Town Centres study (B13) (paragraph 8.2.7) been utilised to specifically inform the strategy and the policy criteria?
- 8.4 Does the Medway Retail and Town Centres study (B13) cover Hoo?
- 8.5 Have other options to the town centre strategies been considered, including the provision of a greater amount of housing (and less retail potentially)?

Policy S16: Hierarchy of Centres

- 8.6 Why is Hempstead Valley defined as a District Centre in the hierarchy under Policy S16 (1.b) as it seems to have a significantly different character compared to the rest of the centres?
- 8.7 Does the size of Rainham's centre warrant its specific inclusion in the hierarchy under Policy S16?
- 8.8 Why are Medway Valley Leisure Park and Dockside not included in the hierarchy under Policy S16 as they are the subject of Policies DM13 and DM14, respectively?
- 8.9 Have alternative approaches to this hierarchy been considered and so is it justified as an appropriate strategy under Policy S16?
- 8.10 Is it intended that criterion 3. under Policy S16 concerning new centres would apply to where new centres will be required under criterion 2. for the identified areas of strategic growth?
- 8.11 If so, would this provide an effective way of planning for the identified areas of strategic growth, as criterion 3. seems also to require justification for such centres?
- 8.12 How has the Medway Retail and Town Centres study (B13) been used to inform the hierarchy?

Policy T15: Sequential Assessment

- 8.13 Is applying an appropriate location-based approach within the hierarchy of centres (third paragraph of the policy) consistent with the sequential test as set out in national policy?
- 8.14 Is preferring sites that are accessible and well connected to town centres, including for out of centre sites (fifth paragraph of the policy), consistent with the sequential test as set out in national policy?
- 8.15 Would smaller scale development be the subject of Policy T15?
- 8.16 In what circumstances would ancillary development be the subject of Policy T15?

Policy T16: Ancillary Development

- 8.17 How is ancillary development defined for the purposes of Policy T16?
- 8.18 Is having a policy on ancillary development consistent with national policy on the vitality of town centres?
- 8.19 How have the criteria for Policy T16 (a. to e.) been derived, in terms of whether they are justified and effective?

Policy T17: Impact Assessment

- 8.20 What is the justification for the impact assessment thresholds, as they are substantially lower than those set out in national policy on the vitality of town centres?
- 8.21 Was a differentiated threshold approach, based on location, considered?
- 8.22 When Policy T17 (criterion a.) states that the scale of food and beverage proposals will be given locational consideration, what does this mean as regards the need for an impact assessment?
- 8.23 In what circumstances would ancillary development be the subject of Policy T17?
- 8.24 Where Policy T17 states (the paragraph under the b. criterion) that proposals may be conditioned or legal agreements established, what does this mean as managing the impact on centres?
- 8.25 Are public realm works, signage, linkages and demonstrating sustainable travel choices relevant to an impact assessment under Policy T17 (last but one paragraph) and therefore consistent with national policy?

Policy S17: Chatham Town Centre

- 8.26 Please explain how the Primary Shopping Area, as shown on the Policies Map, has been defined for Chatham Town Centre?
- 8.27 Please explain the relationship between the 2019 Chatham Masterplan and Chatham Design Code 2024 under Policy 17 (third paragraph, first bullet point), and how does this impact on the policy?
- 8.28 What does 'updated strategic guidance' (third paragraph, first bullet point), mean and how is this reflected in Policy S17, including if there are further updates to such documents?
- 8.29 Why are the units at the entrance of the Pentagon particularly important as signalling the core of the high street under Policy S17 (third paragraph, second bullet point)?

- 8.30 What more broadly is the role of the Pentagon in the town centre, as it is referenced a number of times in Policy S17.
- 8.31 In terms of whether Policy S17 would be effective, why does this policy replicate provisions in Policy S15 that encourage employment uses in and on the edge of the centre (third paragraph, sixth bullet point)?
- 8.32 Why is making the centre child-friendly (third paragraph, seventh bullet point) of particular relevance to this town centre?
- 8.33 In terms of whether Policy S17 would be effective, are the opportunity sites designated on the Policies Map?
- 8.34 Why is the Trafalgar Centre, as an opportunity site (as mentioned at paragraph 8.7.5), not included in Policy S17 itself?

Policy S18: Rochester District Centre

- 8.35 Why has a Primary Shopping Area not been defined for Rochester, unlike the rest of the District Centres?
- 8.36 How does Policy S18 reflect the rich heritage value associated with Rochester District Centre (paragraph 8.8.1)?
- 8.37 How does the Policy S18 reflect the identified qualitative gap of a foodstore (paragraph 8.8.3), as it refers to the provision of specifically top-up convenience goods retailing?

Policy S19: Gillingham District Centre

- 8.38 Why has a Primary Shopping Area been defined for what is a District Centre (Gillingham)?
- 8.39 How is improving vehicular movement in the centre consistent with providing sustainability accessed community facilities and services, under Policy S19 (second paragraph, fifth bullet point)?
- 8.40 Does Policy S19 provide sufficient clarity over what it would expect developers to provide in the regeneration of the centre, in terms of whether the policy would be effective?
- 8.41 How has Policy S19 been informed by the Gillingham Masterplan 2019?

Policy S20: Strood District Centre

- 8.42 Why has a Primary Shopping Area been defined for what is a District Centre (Strood)?
- 8.43 Why is there a blank bullet point at the start of the bullet point list in Policy S20?
- 8.44 What is meant by the light industrial offer under Policy S20 (fifth bullet point) and should the first letter of 'seeking' be capitalised?
- 8.45 In terms of whether Policy S20 would be effective, how would the transport interchange be delivered (sixth bullet point)?
- 8.46 Also, in terms of whether Policy S20 would be effective, how would the new platforms at Strood Rail station be provided and is this supported by Network Rail (sixth bullet point)?
- 8.47 When would the strategic flood management infrastructure (last bullet point) need to be provided?

- 8.48 Does Policy S20 provide sufficient clarity over what it would expect developers to provide in the centre, in terms of the effectiveness of the policy?
- 8.49 How is Policy S20 informed by the Strood Town Centre masterplan (second paragraph) and the opportunity sites that the masterplan identifies?
- 8.50 Would Policy S20 deliver residential riverside regeneration as per the Strood Waterfront Development Brief 2018 (paragraph 8.10.8)?
- 8.51 What is the relationship between the Strood Town Centre masterplan and the Strood Waterfront Development Brief 2018, and how does this impact on Policy S20?

Policy S21: Rainham District Centre

- 8.52 Does Policy S21 reflect any specific opportunities there may be for improving the centre and related infrastructure, such as the rail station?
- 8.53 Why has a Primary Shopping Area been defined for this District Centre (Rainham), given that it is of a modest size?

Policy S22: Hoo Peninsula

- 8.54 Why is the creation of a total of three new centres on the Hoo Peninsula justified under Policy S22?
- 8.55 Why is the preferred location for the main neighbourhood centre to the east of Hoo, under Policy S22?
- 8.56 When this part of Policy S22 refers to this centre being located in an 'attractive location' what does this mean?
- 8.57 Why would an impact assessment be required when triggered under Policy S22 (last paragraph), given that Policy S22 also confirms that a new main centre and two neighbourhood centres would be required?
- 8.58 Where would the new main centre and two neighbourhood centres under Policy S22 be found in Medway's hierarchy of centres?
- 8.59 How has the Medway Retail and Town Centres Study (ref: B13) informed Policy S22, particularly the effect of the new main centre and two neighbourhood centres on the existing Hoo village centre and centres in the hierarchy?
- 8.60 Is the formatting of the policy correct/as intended under 'The main centre;' and 'The neighbourhood centres'?

Policy S23: Hempstead Valley District Centre

- 8.61 Why is this District Centre (Hempstead Valley) not defined on the Policies Map?
- 8.62 As this District Centre (Hempstead Valley) is not defined, is it the intention under Policy S23 to permit the enlargement of this centre, e.g. for a new foodstore (paragraph 8.13.4, noting the typo)?
- 8.63 Does Policy S23 (and identifying it in the hierarchy) have the potential to undermine Chatham Town Centre and the other more traditional District Centres, as Policy S23 in principle supports further retail and leisure?
- 8.64 If it does have the potential to undermine these centres, how is the policy justified?
- 8.65 Why does Policy S23 not allow for other uses, such as housing or employment?
- 8.66 Please explain if/how the impact assessment under Policy S23 (second paragraph) would differ from the requirements under Policy T17?

- 8.67 How would the Capstone Valley strategic allocation and the Lidsing proposal in Maidstone (paragraph 8.13.4) have implications for further retail provision in the area, in particular the Hempstead Valley District Centre?
- 8.68 How has the Medway and Retail Town Centres Study (paragraph 8.13.7, noting the typo) (ref: B13) informed the particular policy approach for this centre?

Policy DM12: Local and Rural Centres

- 8.69 How will Policy DM12 be effective as regards the Hoo Peninsula, as it has its own retail and town centre policy (Policy S22)?
- 8.70 How does Policy DM12 define walking distances, under criteria 2. and 3.?
- 8.71 Why is criterion 3 permissive to the loss of core uses, whilst criterion 2 is not as regards top-up shopping facilities, and will this impact on the effectiveness of Policy DM12? Alternatively, are top-up shopping facilities not a core use for the purposes of this policy?
- 8.72 What does sustainability mean for the purposes of criterion 4 of Policy DM12?
- 8.73 Is the list (and addresses) of local and rural centres as set out in Policy DM12 up to date and correct, and accurately shown on the Policies Map?
- 8.74 Where a review of centres has taken place (paragraph 8.14.2), how has this informed whether the policy would be justified and effective?

Policy T18: Shopping Parades and Neighbourhood Centres

- 8.75 Why is Policy T18 a 'thematic' policy, whilst Policy DM12: Local and Rural Centres is a non-strategic development management policy?
- 8.76 Is the list (and addresses) of the shopping parades and neighbourhood centres as set out in Policy T18 up-to-date and correct, and accurately shown on the Policies Map?
- 8.77 Why are shopping parades and neighbourhood centres local and rural centres in their infancy? (paragraph 8.15.1)
- 8.78 If it is intended shopping parades and neighbourhood centres will all (or some will) grow, how will this be delivered through Policy T18 in terms of whether it would be effective?
- 8.79 How has this list of centres been derived/reviewed by officers of the Council? (paragraph 8.15.3)
- 8.80 Should shopping parades and neighbourhood centres that are in rural areas be defined as local and rural centres instead (under Policy DM12)?

Policy T19: Meanwhile Uses

- 8.81 How is Policy T19 for such uses justified in Medway?
- 8.82 Should Policy T19 refer to where such uses require planning permission, in terms of being effective?
- 8.83 Why is there an 'and' at the end of the fourth bullet point from the end of Policy T19?

Policy DM13: Medway Valley Leisure Park

- 8.84 Why is Policy DM13 justified as it seems to concern an out of centre location for the purposes of the hierarchy of centres?

- 8.85 What does 'leisure designation' mean for the purposes of Policy DM13 (third paragraph)?
- 8.86 How is Policy DM13 supporting proposals that will be compliant with the 'leisure designation' justified with a sequential and impact assessment-based approach, under the Plan?
- 8.87 How does Policy DM13 deal differently from 'leisure' proposals in other out of centre locations?

Policy DM14: Dockside

- 8.88 Why is Policy DM14 justified as it seems to concern an out of centre location for the purposes of the hierarchy of centres?
- 8.89 How does Policy DM14 deal differently from leisure and retail proposals in other out of centre locations?