

Medway Local Plan Examination

Consultation on Supporting Documents – June-July 2026

Appendix B:

Summary of ‘Supporting Evidence Documents’ Consultation

July 2026



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Overview

Medway Council held the ‘Supporting Evidence Documents’ consultation from 8 June to 6 July 2026. The Council received 51 responses in total from 43 separate organisations and individuals. Some respondents duplicated comments through email and online submissions.

Responses were received from a range of respondents including statutory consultees, developers, utility providers, councillors, parish councils, other organisations and members of the public.

Appendix A contains all representations received in their original format. This report (Appendix B) provides a summary of the representations received. Appendix C sets out the Council’s consideration of the issues raised in the representations.

Several clear themes emerge across the consultation:

Key areas of support from statutory consultees

- Natural England broadly supports elements of the Habitats Regulations Assessment (HRA), including water resources and water quality conclusions, subject to further policy refinement and agreement on mitigation measures.
- National Highways considers that transport evidence has now addressed earlier concerns and generally supports the technical transport assessments and proposed mitigation work.
- Sport England supports the direction of the emerging Playing Pitch Strategy and Built Facilities Strategy work.

Principal concerns

- Deliverability of major allocations, particularly Hoo Peninsula, Capstone Valley, and Strood West.
- Uncertainty regarding:
 - Habitat mitigation measures.
 - Transport mitigation funding and delivery.
 - Health, education and water infrastructure capacity.
 - Housing delivery assumptions and trajectory.
- Objections to:
 - Green Belt/Grey Belt release.

- Perceived infrastructure deficits.
- Housing numbers.
- Consultation process and transparency.

Respondent groups

- Developers generally challenged evidence supporting site selection, infrastructure funding, Green Belt assessments and housing trajectory assumptions whilst promoting alternative sites.
- Members of the public focused heavily on Green Belt protection, infrastructure shortfalls, environmental impacts and consultation concerns.
- Parish councils generally sought greater recognition of local infrastructure needs and stronger engagement.

Document-by-document summary

A4.1 and A4.2 Submission Habitats Regulations Assessment

Statutory consultees

Natural England:

- Supports the identified designated sites and impact pathways.
- Agrees with water supply and water quality conclusions.
- Supports further work on recreational mitigation and the Strategic Environmental Programme.
- Wishes to continue discussions before reaching final agreement.

Developers

Key concerns:

- Air quality mitigation at North Downs Woodlands SAC remains unproven.
- Recreational mitigation through Bird Wise and SEMS lacks sufficient certainty.
- Hoo Peninsula and Capstone Valley allocations rely on unresolved environmental mitigation.
- Significant viability concerns regarding additional mitigation costs.

Other organisations

A representation argued:

- The HRA relies excessively on the Bird Wise/SAMMS mitigation scheme.
- Insufficient evidence exists demonstrating the effectiveness of Bird Wise after approximately ten years of operation.
- Recreation disturbance impacts remain unresolved.
- The HRA may not meet the legal tests established through HRA case law.

Homes England

- Supports SEMS in principle.
- Requests corrections regarding land ownership and the availability of Lodge Hill land within SEMS proposals.

B2 Infrastructure Delivery Plan

Main issues raised

Developers

Raised concerns regarding:

- Lack of certainty around infrastructure funding.
- Heavy reliance on developer contributions.
- Viability implications.
- Uncosted transport mitigation.
- Educational and healthcare funding assumptions.
- Delivery of schools and strategic transport projects.

Other organisations

The Chatham Maritime Trust:

- Argues that blue infrastructure, water basins, lock gates and the Water Sports Centre are largely absent from the IDP.
- Requests greater policy safeguards and infrastructure recognition.

Utility providers

- Request updates to reflect current infrastructure investment plans.

Parish councils

- Seek greater recognition of local transport pressures and infrastructure requirements.

Members of the public and councillors

Express concerns about:

- Healthcare capacity.
- School provision.
- Water supply resilience.
- Highway funding uncertainty.

B4 Developer Contributions and Obligations Guide

Developers

Objections to:

- Standardised contribution rates.

- Education contributions.
- Healthcare contributions.
- Cultural and community charges.
- Heritage and town centre enhancement contributions.

Main argument:

- Contributions have not been sufficiently evidenced and may be seeking to address existing infrastructure deficits rather than development impacts.

Parish councils

- Seek clearer and stronger mechanisms for directing developer contributions to parished areas.

Strategic Transport Assessment (B18.1 to B18.9)

National Highways

Largely supportive:

- Considers most previous concerns resolved.
- Generally content with forecasting, modelling and mitigation evidence.
- Requests continued work on M2 Junctions 1 and 4 towards implementation.

Developers

Issues raised:

- Funding uncertainty.
- Viability impacts.
- Delivery of strategic mitigation.
- Reliance on major junction improvements.
- Sustainability implications of revised rail proposals.

Parish councils

Object to:

- Capstone Valley assumptions.
- M2 Junction 4 proposals.
- Traffic modelling assumptions.
- Deliverability of associated road infrastructure.

B22.10 Health and Wellbeing Topic Paper

Councillors

- Supports addressing issues of obesity in children.

B22.1 Site Selection Topic Paper

Developers

Contest:

- Site selection lacks transparency.
- Decision-making methodology is unclear.
- Insufficient justification has been provided for rejected sites.
- Deliverability evidence is inadequate.

Other organisations

Suggest:

- Potential brownfield opportunities may have been discounted too early.

Members of the public

Object to Green Belt allocations and question the evidence supporting site selection decisions.

B22.2 Hoo Peninsula Strategic Environmental Programme

Developers and Homes England

- Support objectives but question deliverability and land assumptions.
- Seek clarification regarding land ownership and implementation.

Councillors

- View the programme as aspirational.
- Raise concerns about governance, funding and delivery.

RSPB England

- Request further evidence and supporting studies.

B22.4 Green Belt Exceptional Circumstances Topic Paper and MLP/ED7

Dominant consultation theme

This attracted a number of objections, particularly from local residents, in connection with a proposed allocation.

Members of the public

Repeated concerns regarding:

- Loss of Green Belt.
- Lack of exceptional circumstances.
- Urban sprawl between Strood and Gravesham.

- Agricultural land loss.
- Infrastructure pressures.
- Inadequate consultation.
- Questioning the Grey Belt methodology.

Developers

Contest:

- Green Belt parcel methodology.
- Cross-boundary dependency on Gravesham's emerging Local Plan.
- Consistency of assessments.
- Treatment of alternative sites such as Holborough Quarry.

Councillors

Question:

- Exceptional circumstances case.
- Brownfield capacity evidence.
- Transparency of decision making.
- Relationship with Gravesham Borough Council and developers.

B22.5 Housing Delivery Topic Paper

Developers

Contest:

- Housing requirement is understated.
- Supply is overstated.
- Housing trajectory is unrealistic.
- More allocations are required.
- Five-year housing land supply is not robust.

Councillors

Express concerns about:

- Historic under-delivery.
- Reliance on developers to achieve delivery assumptions.

Other organisations

Request further explanation of brownfield opportunities.

B22.7 Gypsy and Traveller Accommodation Topic Paper

Councillor comments

- Heavy reliance on criteria-based policies.
- Limited evidence that identified needs can be met.

- Little explanation regarding failure of the call-for-sites exercise.

MLP/ED12 Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal

Environment Agency

Maintains objections:

- Local Plan remains unsound.
- Concerns remain regarding Flood Zone 3 and 3b allocations.
- Questions methodology and treatment of mitigation.

Utility providers

Highlight:

- Need for SuDS delivery across development sites.

Members of the public

Raise concerns about:

- Water supply resilience.
- Existing flooding problems.
- Timing of flood evidence publication.

MLP/ED11C Playing Pitch Strategy - Summary

Statutory Body:

- Sport England confirms that from its experience of working on the project with Medway Council and others, the final document will be sound and robust.

Members of the public:

- The Strood football ground is threatened by proposed housing development in the draft Local Plan.
- Even if the pitches are retained, nearby development could increase pollution and negatively affect users.

MPs, Members and Parish Councils:

- Cliffe Crusaders require floodlighting and a 3G pitch to support training and junior and women's football.
- Three local recreation fields exist but are not equipped for sports use.

MLP/ED11A Built Facilities Strategy – Summary

MPs, Members and Parish Councils:

- More research is required for providing built facilities in the rural parishes.

Members of the public:

- Concerns that the scale of proposed housing will place further pressure on already stretched services and infrastructure.
- infrastructure improvements should be delivered before significant housing growth.
- Concerns remain that future water demand could exceed available supply, and housing growth should not proceed until adequate water infrastructure is secured.

MLP/ED11B Facilities Planning Model – Summary

Members of the Public:

- Address existing infrastructure needs before proceeding to deliver more housing.

Statutory Body:

- Sport England is concerned about the publication of this document at this stage of drafting.

A11 Duty to Cooperate Statement and A12.1 Statement of Common Ground with Prescribed Bodies

Members of the Public:

- Concerns that Medway residents would bear the impacts of development while helping meet Gravesham's housing targets.
- Objection to the loss of Green Belt land, which is considered important for preventing urban sprawl and maintaining separation between Strood and Gravesham.
- Overall view that the proposal is unsound due to flawed evidence, loss of Green Belt, and inadequate public accountability.

General consultation themes

Members of the public

The most common issues were:

1. Opposition to Green Belt release.
2. Highway congestion.
3. GP and hospital capacity.
4. School places.
5. Water supply concerns.
6. Environmental impacts and biodiversity.
7. Consultation process concerns.
8. Perception that infrastructure should precede development.

Parish councils

Key themes:

- Better consultation and engagement.
- Local infrastructure deficits.
- Transport concerns.
- Lack of recognition of rural needs.

Developers

Key themes:

- Infrastructure funding uncertainty.
- Viability concerns.
- Green Belt methodology concerns.
- Housing supply and trajectory criticisms.
- Promotion of alternative allocations.

Statutory bodies

Overall position:

- Generally supportive of progress made to the technical evidence base.
- Seeking further refinement and clarification rather than fundamental change.
- Main continuing issues relate to habitats mitigation, flooding and final transport mitigation arrangements at implementation stage.

Overall conclusion

The consultation demonstrates a clear division between statutory consultees, who largely support the evolving evidence base subject to further work, and developers, parish councils and members of the public, who raise concerns regarding Green Belt

release, infrastructure capacity, environmental mitigation, funding certainty and delivery assumptions. Most comments were made in relation to the Green Belt Exceptional Circumstances Topic Paper (ref: B22.4), Infrastructure Delivery Plan (ref: B2), Housing Delivery Topic Paper (ref: B22.5) and Submission Habitats Regulations Assessment (ref: A4.1).