

Medway Local Plan Examination

Consultation on Supporting Documents – June-July 2026

Appendix C:

Medway Council's Consideration of Representations

July 2026



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Appendix C: Medway Council's Consideration of Representations

Introduction

This document sets out the Council's consideration of the representations, presented in the same order as the 'Supporting Evidence Documents' consultation.

Documents that were updated between June and December 2025 and published in December 2025 with the submission of the plan

A4.1 Submission Habitats Regulations Assessment

General

Responses received: 4

ID	Name	Stakeholder
E.13	Save the Hoo Peninsula Campaign	Voluntary and Community Organisation
E.17	Natural England	Statutory Body
E.20	Hallam Land	Developer
E.29	Homes England	Developer

Summary

Statutory body

- 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
- Supports continued engagement with council and updated Statement of Common Ground.

Developers

Key issues:

- 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.
- Homes England supports SEMS in principle.
- Homes England requests corrections regarding land ownership and the availability of Lodge Hill land within SEMS proposals.

Voluntary and Community Organisation

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.

Council Response

The Bird Wise SAMMS programme has been developed with Natural England and environmental organisations and is recognised as an appropriate approach to addressing the impacts of recreational disturbance.

The Hoo Peninsula Strategic Environmental Programme is in development, and is supported by Natural England, environmental organisations and developers in the area. Progress will be reflected in an updated Statement of Common Ground with Natural England.

The proposed mitigations to address potential impacts from cumulative development on the North Downs Woodland SAC to the south of Lidsing/Capstone Valley follows an approach agreed with Natural England. The Council will liaise with neighbouring Maidstone Borough Council on an integrated approach.

B2 Infrastructure Delivery Plan (December 2025)

General

Responses received specifying this document: 9

ID	Name	Stakeholder
E.4	Chatham Maritime Trust	Voluntary or Community organisation
E.5	Southern Water	Utility Provider
E.9	Catesby Strategic Land	Developer or Agent
E.11	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils
E.19	Catesby Strategic Land (land South of Lower Rainham Road)	Developer or Agent
E.20	Hallam Land	Developer or Agent
E.21	Helen Leydon	Members of the Public
5091	Cllr Elizabeth Turpin	MPs, Members and Parish Councils
5100	Jona Infrastructure Advisory	Developer or Agent

These representations were made without reference to a specific document. Many of the comments relate to previously published documents. However, the content of the representations suggest that they could be linked to this document.

Responses received: 10

ID	Name	Stakeholder
E.1	Jean Winter	Members of the public
E.10	Nicola Smith	Members of the public
E.12	Tracy Charlesworth	Members of the public
E.18	Lynn Wilson	Members of the public
E.22	Lee Squires	Members of the public
E.23	Halling Parish Council	MPs, Members and Parish Councils
E.25	Natalie Hale	Members of the public
E.27	Ted Butcher	Members of the public
E.32	Allhallows Parish Council	MPs, Members and Parish Councils
E.33	Sutay Fallarino	Members of the public

Summary

Developer or Agents

Repeated 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.

Voluntary and Community 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.
- There has been a lack of sufficient consultation or consideration of Parish Council area needs for existing and future requirements for their areas.
- Supports prompt adoption of the Medway Local Plan to reduce speculative development on unsuitable sites.
- Believes transport challenges and future traffic impacts have not been fully assessed.
- Welcomes the proposed Hoo transport hub but notes a lack of detail on its delivery and benefits.
- Raises concerns about the capacity of water, electricity and healthcare infrastructure, noting the local surgery has no allocated doctor.

Members of the public and Councillors

Express concerns about:

- Healthcare capacity
- School provision
- Water supply resilience
- Highway funding uncertainty
- Impact of proposals from surround areas outside of Medway on infrastructure
- Lack of sufficient infrastructure to cope with existing growth

Council Response

The Council notes that the representations submitted by Chatham Maritime Trust refer to ongoing matters with Peel Waters, and that there are opportunities to collaborate in resolving issues. The Infrastructure Delivery Plan is an iterative document, which can be updated over the plan period.

Southern Water's comments are welcomed; they will be used to update the next iteration of the IDP, which should be regarded as a 'live' document. Medway Council supports future engagement to inform Southern Water's new Drainage and Wastewater Management Plan.

The Council accepts that the reference to Cliffe and Cliffe Woods in paragraph 2.7.3 of the IDP (ref: B2) should be deleted.

The Council acknowledges residents' concerns about existing infrastructure.

The Council considers that the IDP (ref: B2), Developer Contributions and Obligations Guide (ref: B4) and Viability Assessment (ref: B5), along with work towards draft statements of common ground on strategic site allocations, can inform suggested main modifications to adhere to paragraph 35 of the National Planning Policy Framework.

The Council considers that the level of detail in the IDP (ref: B2) is proportionate at local plan-making stage.

The Council acknowledges residents' concerns about existing infrastructure. The IDP (ref: B2) demonstrates the Council carried out extensive engagement and liaison with infrastructure providers in order to inform the Local Plan and the strategy and policies contained within it. In addition, the IDP is a living document which will continue to be updated.

This consultation has been conducted at the request of the Inspector. The Inspector will have full regard to all consultation responses received and will take account in the next steps for the examination.

B4 Developer Contributions and Obligations Guide (December 2025)

General

Responses received: 2

ID	Name	Stakeholder
E.9	Catesby Strategic Land	Developer or Agents
E.11	Cliffe and Cliffe Woods Parish Council	MPs, Members and Parish Councils

Summary

Developer or Agents

- Objections were made to standardised contribution rates, education contributions, healthcare contributions, cultural and community charges, and heritage and town centre enhancement contributions
- 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

Council Response

The Council consulted separately on the Developer Contribution Guide in Spring 2026, to inform an update to the Supplementary Planning Document, pending adoption of the new Local Plan.

The Council considers that the Guide meets the legal requirements, is evidence-based, and applies the policy with reference to site specific considerations.

The Council will include the role of Parish Councils in its review of governance on developer contributions.

B18.1 Strategic Transport Assessment

General

Responses received: 4

ID	Name	Stakeholder
E.24	National Highways	Statutory body
E6	Ray Dines, Boxley Parish Councillor	Member of Public/ MPs, Members and Parish Council
E.8	Boxley Parish Council	MPs, Members and Parish Council
E.19	Catesby Strategic Land (Land South of Rainham Road)	Developer or Agents

These representations were made without reference to a specific document. Many of the comments relate to previously published documents. However, the content of the representations suggest that they could be linked to this document.

Responses received: 1

ID	Name	Stakeholder
E.31	Hoo Consortium	Developers or Agents

Summary

Statutory body:

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

Developer or Agents

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

Council Response

The Strategic Transport Assessment comprises a robust, proportionate evidence base for the Medway Local Plan 2041, supported by National Highways, and it includes a concept design and indicative costings for an interim / standalone mitigation scheme at M2 Junction 4.

The Council does not accept that there are inconsistencies regarding Lower Bloors Lane. The indicative access arrangements for site allocation RN9 were coded into the traffic model based on the best information available at that time. The widening of Lower Twydall Lane and Lower Bloors Lane has not been identified in the Strategic Transport Assessment to mitigate the traffic impacts associated with cumulative traffic generation; it will be explored in subsequent detailed design of RN9.

B18.4 Strategic Transport Assessment - Merge and Diverge Assessment

General

Responses received: 1

ID	Name	Stakeholder
E.24	National Highways	Statutory Body

Summary

Recommend that the performance of this arm of the junction should be kept under review via the proposed ‘monitor and manage’ strategy.

Council Response

This was covered in 2.2 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026.

MLP/ED10 noted the publication of Gravesham Borough Council’s pre-submission draft plan and the potential need to commission additional work to assess the cumulative impacts on the capacity and safety at M2 junction 1. Following a meeting with National

Highways, Kent County Council and Gravesham Borough Council on 17 July 2026, Medway Council requested a quote from its traffic modelling contractor to:

- Determine whether the concept design for M2 Junction 1 could accommodate the combined traffic generated by sites allocated for development in the submitted Medway Local Plan and the emerging Gravesham Local Plan.
- Determine when, i.e. what year, the concept design for M2 Junction 1 is required, based on the annual housing/growth trajectories already supplied by both Medway Council and Gravesham Borough Council.
- Quantify how much traffic from site allocations across Medway and Gravesham would route via M2 Junction 1. This should be compared to background growth. This could inform how the mitigation scheme for M2 Junction 1 could be delivered, i.e. via a Section 278 agreement attached to a strategic site allocation or through pooled Section 106 agreements and delivered by the local transport authority.
- Present the outputs and conclusion in a concise technical note.

B18.5 Strategic Transport Assessment - M2 Junction

Analysis Technical Note

General

Responses received: 1

ID	Name	Stakeholder
E.24	National Highways	Statutory Body

Summary

National Highways is content the analysis in the report and that the information for this junction is comprehensive. No further comments.

Council Response

This was covered in 2.4 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026. Following National Highways' representations, this matter will be updated from 'under discussion' to 'agreed'.

B18.6 Strategic Transport Assessment - Proportionality Assessment

General

Responses received: 1

ID	Name	Stakeholder
E.24	National Highways	Statutory body

Summary

- National Highways is content with the analysis and conclusions set out in the report and have no further comment.

Council Response

The submission Statement of Common Ground with National Highways (ref: A12.2) will be updated in August 2026.

B18.7 Strategic Transport Assessment - Junction Modelling and Mitigation Report

General

Responses received: 4

ID	Name	Stakeholder
E.6	Ray Dines	Member of Public/ MPs, Members and Parish Councils
E.8	Boxley Parish Council	MPs, Members and Parish Councils
E.14	Peel Waters	Developer or Agents
E.24	National Highways	Statutory body

Summary

National Highways

- Largely supportive and considers most previous concerns resolved.
- Generally content with forecasting, modelling and mitigation evidence.

Developers

Issues raised:

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

Parish council

Object to:

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

Council Response

Medway Council's officers are engaged with Maidstone Borough Council and Lidsing Garden Community developers to coordinate cross-border plans during the development of their proposed layout and design for the full Lidsing scheme. The Lidsing Garden Community was considered 'more than likely' in our strategic modelling approach to uncertainty (ref: B18.1, paragraph 3.3.2) and both were coded into our core 'Do Something' scenario. However, to demonstrate that Medway Local Plan allocations are achievable without Lidsing and its infrastructure, Medway Council commissioned an interim / standalone scheme.

The purpose of the M2 Junction 4 interim / standalone scheme (ref: B18.7, paragraph 13.3) is to demonstrate ability to mitigate the net impact of the Medway Local Plan 2041, should the Lidsing scheme be delayed or cancelled. From a Medway Local Plan 2041 perspective, both schemes have been shown to address the impact of Medway development. This is not in conflict with the decision letter referenced from the Maidstone Local Plan Review Inspector because the interim scheme is not intended to address Lidsing development without its supporting infrastructure – this would be a topic for Maidstone Borough Council and Lidsing developers to consider further.

In response to other points:

- *The number of homes for Lidsing was based on the expected number of homes delivered by 2041 at the time of analysis.*
- *The design for Forge Lane / Hempstead Road / North Dane Way remains in development by Lidsing's promoters.*
- *Land for a roundabout at Gibraltar Farm / North Dane Way and the Lidsing spine road is safeguarded in the Gibraltar Farm design. The latest plans from the*

Gibraltar Farm applicant do not show a roundabout because this is not necessary for access from North Dane Way while Lidsing remains uncommitted.

The Strategic Transport Assessment - Proportionality Assessment (ref: B18.6) indicates that the Pier Road / Gillingham Gate / Dynamo Way Gyratory is required at the end of the plan period. Paragraphs 9.2.13 to 9.2.15 of the submitted Medway Local Plan 2041 (ref: A1) refer to a Monitor and Manage Mitigation Strategy.

This was covered in 2.5 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026. Following National Highways' representations, this matter will be updated from 'under discussion' to 'agreed'.

B22.10 Health and Wellbeing Topic Paper

General

Responses received: 1

ID	Name	Stakeholder
5090	Cllr Elizabeth Turpin	MPs, Members and Parish Councils

Summary

Supports addressing issues of obesity in children.

Council Response

This representation has been noted.

Documents that were unavailable in June 2025 and published in December 2025 with the submission of the plan

A4.2 Submission Habitats Regulations Assessment - Air Quality Modelling for Ecology Assessment

General

Responses received: 1

ID	Name	Stakeholder
E.17	Natural England	Statutory body

Summary

- A joint transport mitigation strategy with Maidstone Borough Council has been proposed to address impacts on the North Downs Woodlands SAC.
- Further evidence is required to demonstrate the effectiveness of the mitigation measures.
- Natural England will continue working with Medway and Maidstone Councils to develop and agree suitable mitigation.
- Agreed mitigation could be reflected in an updated Statement of Common Ground.

Council Response

This was covered in paragraphs 2.6.3 to 2.6.5 and 4.2.5 to 4.2.7 of the submission Statement of Common Ground with Prescribed Bodies (ref: A12.1), which will be updated in August 2026.

B18.8.1 to 18.8.3 Strategic Transport Assessment - M2 Junction 1 and 18.9 M2 Junction 4 Cost Estimate Report

General

Responses received: 1

ID	Name	Stakeholder
E.24	National Highways	Statutory body

Summary

M2 Junction 1 Design Review:

National Highways consider that this information is appropriate for the purposes of appraising the scheme as concept mitigation for anticipated Local Plan impacts at this location. No significant departures are identified; it is expected that this work will be expanded as the concept design is developed further.

M2 Junction 1 Safety Review:

Request that comments previously made are addressed prior to further work being undertaken at the preliminary design stage, ideally via the undertaking of a Stage 1 Road Safety Audit.

M2 Junction 1 Cost estimate report:

Request that comments made in December 2025 are addressed prior to further work being undertaken at the preliminary design stage

M2 Junction 4 Cost estimate report:

Requests continued work on M2 Junctions 1 and 4 towards implementation.

Council Response

The M2 Junction 1 design review was covered in 2.2 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026. Following National Highways' representations, this matter will be updated from 'under discussion' to 'agreed'.

The cost estimate related to M2 Junction 1 and safety review were covered in 2.2 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026. Following National Highways' representations, this matter will be updated from 'under discussion' to 'agreed'. National Highways'

representations will inform the next design stage associated with a planning application to mitigate M2 Junction 1.

The cost estimate related to M2 Junction 4 was covered in 2.5 of the submission Statement of Common Ground with National Highways (ref: A12.2), which will be updated in August 2026.

B22.1 Site Selection Topic Paper

General

Responses received: 4

ID	Name	Stakeholder
E.3	Campaign to Protect Rural England	Voluntary and Community Organisation
E.9	Catesby Strategic Land	Developer or Agents
E.19	Catesby Strategic Land (Land South of Rainham Road)	Developer or Agents
5085	Mrs Jennifer Price	Members of the public

Summary

Developers:

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

Other Organisations:

- Suggest that 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.

Council Response

The purpose of the Site Selection Topic Paper (ref: B22.1) is to explain how sites were selected or rejected for allocation. Site-specific information is set out in the Land Availability Assessment. The Council intends to produce statements of common ground to show how strategic site allocations are achievable.

Urban regeneration is at the forefront of the Medway Local Plan 2041's spatial strategy. The Council published [the Interim Land Availability Assessment \(LAA\)](#) in 2023 to support a Regulation 18 consultation. Paragraph 3.1.6 invited information to confirm the availability of 109 sites – shown on a map at Appendix F of the interim LAA – some of which were identified from planning applications that were refused, withdrawn or expired as at 31 March 2023. Paragraph 2.3.9 of the Site Selection Topic Paper stated

that 'Sites identified from the above sources were treated as unavailable unless their availability was later confirmed.' Site-specific availability status would have been considered in the final LAA and the selection/rejection process.

B22.2 Hoo Peninsula Strategic Environmental Programme Topic Paper

General

Responses received: 3

ID	Name	Stakeholder
E.29	Homes England	Developer or Agents
5094	Cllr Elizabeth Turpin	MPs, Members and Parish Councils
5098	RSPB England	Voluntary and Community Organisation

Summary

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.

Council Response

The Hoo Peninsula Strategic Environmental Programme is in development, and is supported by Natural England, environmental organisations and developers in the area. This work will include engagement with RSPB and Homes England. Progress will be reflected in an updated Statement of Common Ground with Natural England.

B22.4 Green Belt Exceptional Circumstances Topic Paper

General

Responses received: 13

ID	Name	Stakeholder
E.7	Kevin Smith	Members of the public
E.10	Nicola Smith	Members of the public
E.16	Rebecca Smith	Members of the public
E.20	Hallam Land	Developer
E.21	Helen Leydon	Members of the public
E.22	Lee Squires	Members of the public
5083	Mrs Christine Marsh	Members of the public
5084	Cllr Stephen Hubbard	MP, Member, Parish Council
5086, E.2	Mrs Jennifer Price	Members of the public
5093	Cllr Elizabeth Turpin	MP, Member, Parish Council
5095	Mrs Lindsey Morgan	Members of the public
5096	Mr Mark Batchelor	Members of the public
5097	Holbrook Griffith Developments Limited	Developer

These representations were made without reference to a specific document. Many of the comments relate to previously published documents. However, the content of the representations suggest that they could be linked to this document.

Responses received: 7

ID	Name	Stakeholder
E.12	Tracy Charlesworth	Members of the public
E.25	Natalie Hale	Members of the public
E.26	Simon Crane	Members of the public
E.27	Ted Butcher	Members of the public
E.28	J Stocker	Members of the public
E.30	Joe S	Members of the public
E.33	Sutay Fallarino	Members of the public

Summary

Members of the public

Concerns raised 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
- Object to site allocation SA6
- Protection of wildlife
- Presence of high pressure gas pipeline
- Access

Developers

Challenged:

- 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

Council Response

The Green Belt Review (ref: B8) was consulted upon at the Local Plan Regulation 19 stage in June 2025 for six weeks alongside the Local Plan, other supporting documents and public exhibitions were also held.

This consultation has been conducted at the request of the Inspector. The Inspector will have full regard to all consultation responses received and will take account in the next steps for the examination.

Please refer to the Green Belt Review (ref: B8) published in June 2025, which reflects the national changes (2024/2025) in undertaking a Green Belt Review with due consideration of grey belt, which introduced new criteria. The Council's position remains unchanged with regard to categorisation of grey belt land. The criteria for the identification of grey belt land and the assessment against Green Belt purposes are

articulated in guidance, which is focused on sprawl, coalescence, encroachment into the countryside, preserving the character of historic towns, assisting in urban regeneration and whether the impacts on all the Green Belt purposes taken together are impacted upon. Medway Council has followed this process as set out in Medway Council's response to the Inspectors initial queries on Green Belt (ref: MLP/ED7) dated on the 8th of May 2026. Other Green Belt matters are also addressed in this response.

The Inspectors questions (ref: MLP/ED7) were focused on correspondence and meetings specifically regarding the coordination of the Green Belt Review between Gravesham and Medway Councils.

Please refer the top of page 6 (ref: MLP/ED7), which explains clearly the reasoning behind parcel disaggregation, consistent with guidance and Medway's evidence base, and reflective of local circumstances in the application of bullet 3 of paragraph 004 of the PPG.

Please refer to the Transport Assessment for the Lower Thames Crossing for clarification of impact on the Medway Valley and to the Gravesham Local Plan for clarification of exceptional circumstances.

Part of the Rochester Football club sits in Medway and the other part in Gravesham.

Commissioners Road site is not designated as Green Belt on the Southwest policies map. This is an error on the map, which will be included in modifications being compiled.

Policy SA6 allocates this land for development and requires a masterplan to be prepared by developers, which will need to be signed off by both Local authorities. These matters will be investigated in detail during the masterplan preparation, however in scoping the potential for development for inclusion in the Medway Local Plan, the HSE guidance has been followed.

MLP/ED7

The Council did not consult on this Examination document, but some respondents made reference to this in their comments in relation to Green Belt. The comments are noted below for transparency, but the Council's response is to the documents published for consultation.

General

Responses received: 3

ID	Name	Stakeholder
E.7	Kevin Smith	Members of the public
E.22	Lee Squires	Members of the public

5099	Lorena Hatton	Members of the public
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Summary

Members of the public:

- Green Belt has incorrectly been identified as grey belt
- Reliance on Gravesham's Local Plan makes Medway's Local Plan unsound
- Development would reduce separation between Gravesham and Medway
- Inadequate infrastructure
- Object to justification for exceptional circumstances
- Criticism of duty to cooperate
- Loss of agricultural land, erosion of distinct identity and character of both communities
- Impact on aviation fuel pipe, which performs an important function
- Objection to the soundness and legal compliance of strategic allocation SA6

Council response

The Green Belt Review (ref: B8) was published in June 2025 and available for review at Regulation 19.

B22.5 Housing Delivery Topic Paper

General

Responses received: 5

ID	Name	Stakeholder
E.3	Campaign to Protect Rural England	Voluntary and Community Organisation
E.9	Catesby Strategic Land	Developer
E.19	Catesby Strategic Land (Land South of Rainham Road)	Developer
E.20	Hallam Land	Developer
5092	Cllr Elizabeth Turpin	MP, Member and Parish Council
*5097	Holbrook Griffin Developments	Developer

**Whilst the representation was submitted in relation to this document, the content relates to Green Belt matters and has been addressed under B22.4 Exceptional circumstances topic paper instead and noted here.*

Summary

Developers

Challenge that:

- The housing requirement is understated
- The supply is overstated
- The housing trajectory is unrealistic
- More allocations are required
- The 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.

Council Response

Medway Council's response

The Council's Land Availability Assessment was prepared in line with the relevant Planning Practice Guidance. Urban regeneration is at the forefront of the Medway Local Plan 2041's spatial strategy.

A stepped housing requirement is a pragmatic response to the suppressed housing completions in 2024/25.

Medway Council's response to Catesby

Inclusion of sites outside of the Council's submitted development strategy is a matter for the Inspectors at Examination. The Council's position remains unchanged. It is noted that this representation relates to a live planning application.

Medway Council's response to Catesby (land South of Rainham Road)

Inclusion of sites outside of the Council's submitted development strategy is a matter for the Inspectors at Examination. The Council's position remains unchanged.

Medway Council's response to Hallam

Inclusion of sites outside of the Council's submitted development strategy is a matter for the Inspectors at Examination. The Council's position remains unchanged.

Medway Council's response to Holbrook

The Council's position remains unchanged. Please refer to Medway Council's response to the Inspectors initial queries on Green Belt (ref: MLP/ED7) dated on the 8th of May 2026 for further clarification on Green Belt matters.

B22.7 Gypsy and Traveller Accommodation Topic Paper

General

Responses received: 1

ID	Name	Stakeholder
5089	Cllr Elizabeth Turpin	MP, Member and Parish Council

Summary

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.

Council response

*The Council has carried out a further Call for Sites and review of council owned land.
The outcomes of this work will be reported to the Local Plan Inspectors on 31 July.*

New documents

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

General

Responses received: 4

ID	Name	Stakeholder
E.5	Southern Water	Utility provider
E.10	Nicola Smith	Members of the public
E.15	Environment Agency	Statutory Body
E.22	Lee Squires	Members of the public

Summary

Statutory Body

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

Utility provider

- Highlight the 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

Council response

Southern Water's representation and members of the public comments have been noted.

Medway Council's specialist contractor on the SFRA has considered the Environment Agency's response and provided advice:

Regarding the Level 1 SFRA defences comment, we can amend the report to specify that Medway also benefits from informal defences such as naturally elevated ground and river walls. As such, Appendix A.2 includes both informal and formal defences, as it references the EA's 'Spatial Flood Defence' GIS dataset. This is a relatively minor comment and can be amended if needed.

In terms of the Level 2 SFRA with residential site allocations within Flood Zone 3 and Flood Zone 3b, this is partly why the High Level Appraisal of the Medway Flood Defence Strategy was carried out. This study was to identify areas where more detailed investigation is needed, and to help the Council and EA agree how future improvements should be prioritised and funded, including through contributions from new development.

The 'Medway Flood Defences High Level Appraisal' was sent to the Environment Agency for review on 9 July 2026. The Environment Agency has indicated that it will respond by 14 August 2026. This should provide the basis for further collaboration.

In relation to the comments on the timing of this evidence, and existing flooding issues, the Council advises that this is an updated study, following comments from the Environment Agency. Earlier versions of the assessment were available for review in the preparation of the plan. The Council has wider work in relation to existing flooding issues.

MLP/ED11C Playing Pitch Strategy – Summary

General

Responses received: 5

ID	Name	Stakeholder
E.10	Nicola Smith	Members of the public
E.11	Cliffe and Cliffe Woods Parish Council	MP, Members and Parish Councils
E.22	Lee Squires	Members of the public
E.23	Halling Parish Council	MP, Members and Parish Councils
5087	Sport England	Statutory body

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.

Council response

As per MLP/ED11, the Playing Pitch Strategy and the Built Facilities Strategy are subject to change to allow for review by Sport England and the steering group. The associated action plans are being progressed through specific engagement with clubs and operators.

The supportive representation from Sport England has been noted.

MLP/ED11A Built Facilities Strategy – Summary

General

Responses received: 2

ID	Name	Stakeholder
E.11	Cliffe and Cliffe Woods Parish Council	MP, Members and Parish Councils
E.22	Lee Squires	Members of the public

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.

Council response

As per MLP/ED11, the Playing Pitch Strategy and the Built Facilities Strategy are subject to change to allow for review by Sport England and the steering group. The associated action plans are being progressed through specific engagement with clubs and operators.

MLP/ED11B Facilities Planning Model – Summary

General

Responses received: 2

ID	Name	Stakeholder
E.22	Lee Squires	Members of the public
5088	Sport England	Statutory body

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.

Council response

As per MLP/ED11, the Playing Pitch Strategy and the Built Facilities Strategy are subject to change to allow for review by Sport England and the steering group. The associated action plans are being progressed through specific engagement with clubs and operators.

This representation has been noted. The Council published an officer's summary of the FPM outputs, rather than the direct FPM outputs.

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

General

Responses received: 1 for each document.

ID	Name	Stakeholder
E.7	Kevin Smith	Members of the public

Summary

- 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.

Council response

Please refer to Medway Council's response to the Inspectors initial queries on Green Belt (ref: MLP/ED7) dated on the 8th of May 2026 for further clarification on Green Belt matters. The Statement of Common Ground with prescribed bodies (ref: A12.1) notes strategic matters of discussion with Gravesham BC.