# Medway Local Plan Examination

# Consultation on Evidence Documents – October 2026

# Appendix C:

# Medway Council's Consideration of Representations

## November 2026

Medway Council
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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 'Evidence Documents' consultation.

## General

Responses received: 2

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |

### Summary of representations

**MPs, Members and Parish Councils**

- Questioning whether interested parties have been given effective access to the material on which soundness conclusions will actually depend.
- Numerous actions listed at section 10 of the response ranging from the publication of various documents to clarification being sought on matters covered in Phase 1 Matter hearing statements or new points of clarification.
- Inspectors should evaluate the consultation material as a connected evidential chain.
- The SA/SEA and HRA may require updating.
- Justification for Green Belt release remains unresolved.
- Policies require stronger delivery safeguards.
- Further evidence may require major modifications or even withdrawal if problems cannot be resolved.

### Council Response

The process and timing for consultation on the evidence documents have been agreed by Inspectors.

All points in section 10 of the response are noted. Actions and modifications will follow from Examination directed by the Inspectors.

# MLP/ED24A SoCG - Medway Council and Prescribed Bodies

## General

Responses received: 2

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Voluntary and Community Organisations |

## Summary of representations

### MPs, Members and Parish Councils

- SoCGs do not resolve all matters; requests further HRA, HPSEP, flood, transport and infrastructure evidence.
- The updated HRA had not yet been published and therefore the final integrity conclusions cannot be verified.
- Does not accept that Bird Wise/SAMMS has been proven effective for the scale of growth proposed, particularly on the Hoo Peninsula.
- The future design of the Hoo Peninsula Strategic Environmental Programme is not evidence that effective mitigation has been identified, demonstrated or secured.
- Questions whether the delivery of mitigation when required is possible regarding Cockham Community Parkland, Hoo Wetlands and Deangate.
- Questions resolution of the Environment Agency's concerns regarding parts of the Plan that were found unsound.
- Points out unresolved strategic transport matters related to M2 junctions 1 and 4 and other strategic highway improvements.
- Concerns over whether healthcare facilities will be provided early enough to support Hoo Peninsula growth.

### Community/Voluntary Organisations

- Concerns over HPSEP/SEMS delivery, ecological mitigation, Bird Wise effectiveness, HRA evidence, flood defences, funding and governance.

## Council Response

*The Council notes the issues raised and point to earlier written statements that set out responses.*

*The Council notes representations regarding habitat mitigation, flood risk, transport infrastructure and the Hoo Peninsula Strategic Environmental Programme (HPSEP). The Statement of Common Ground demonstrates areas of agreement and ongoing discussion between the Council and statutory bodies and is intended to be updated as work progresses.*

*SoCGs will need to retain some flexibility rather than fixing all details now. There will be ongoing review and engagement. The Council also has a corporate infrastructure group and governance arrangements set up regarding MC and developers, as mentioned in MIQ responses to SA8.*

*We anticipate preparing an addendum Habitats Regulations Assessment that would be consulted upon at the same time as consultation with main modifications.*

*Regarding Bird Wise/SAMMS, a full review, including surveys has been commissioned for reporting next year, in agreement with NE as set out in the Council's Matter 6 hearing statement.*

*<u>Hoo Peninsula Strategic Environmental Programme</u>*

*Work is progressing on the Hoo Peninsula Strategic Environmental Programme and the many points raised in the representations will be addressed in the report including informing the specific costed measures in the strategic environmental programme. Engagement work with environmental bodies and developers is planned in coming weeks, to inform the draft report due by early December, which will be published for consultation.*

*Regarding the Deangate, Cockham and Hoo Wetlands – Deangate – phase 1 completion, the planning permission has expired, but detailed plans are ready for implementation once development certainty established by LP examination.*

*Trigger points for healthcare and community facilities will be defined through ongoing engagement on delivery of infrastructure, in line with the housing trajectory. Responses to site allocations SA8 and SA9 are set out in the Councils' responses to the Phase 2 MIQs.*

*The Council has responded to many questions regarding the Environment Agency's representations at the Phase 2 hearings. Please see the Council's Matter 6 Hearing Statement.*

# MLP/ED24B SoCG - Medway Council & Hoo Consortium

## General

Responses received: 2

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Community/Voluntary Organisations |

## Summary of representations

### MPs, Members and Parish Councils

- Hoo delivery assumptions have changed. Infrastructure cost, timing and funding remain excluded from agreement.
- Questions whether housing growth and infrastructure can be delivered together.
- Produce an allocation-by-allocation phasing matrix.
- Identify infrastructure triggers, funding and contingencies.
- Confirm how ED24B revisions are reflected in ED30.
- Ensure safeguards are not deferred indefinitely.

### Community/Voluntary Organisations

- Lack of certainty on infrastructure contributions from developers in the Statement of Common Ground.
- Lack of secure delivery mechanisms and uncertainty regarding timing, funding and phasing.
- Requests single, publicly available environmental mitigation funding and delivery schedule, enter an updated SoCG resolving the environmental infrastructure items and this should be a requirement given by the Inspectors.
- The other developer Statements of Common Ground do not establish delivery of environmental safeguards (Rainham Parkside Village (MLP/ED24D), Peel Waters for North Gillingham (MLP/ED24E), and the Land West of Strood promoter (MLP/ED24F).

## Council Response

*This SoCG was prepared to assist in the Phase 1 hearing sessions of the Medway Local Plan 2041 Examination, with specific reference to question 3.8: 'How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites.*

*Infrastructure Contributions within SoCGs*

*There is no specific requirement on the content of statements of common ground. The Council anticipates ongoing collaboration/engagement with developers on implementation and review, including trigger points. Please see the Councils' responses to questions on SA8 and SA9 in its Matter 13 Hearing Statement.*

# MLP/ED24C SoCG - Medway Council & F T Atwood & Partners (Capstone Valley)

## General

Responses received: 3

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| 5103 | Ray Dines | Members of the public |
| E.200 | Save the Hoo Peninsula | Community and Voluntary Organisations |

## Summary of representations

### Members of the public

Objects to lack of masterplanning, infrastructure detail, Strategic Transport Assessment and environmental evidence.

### MPs, Members and Parish Councils

- Seeks evidence of cross-boundary infrastructure and Lidsing Garden Community assumptions.
- Publish evidence supporting coordinated cross-border infrastructure strategy and provide contingency scenarios and highway authority confirmation.
- Questions whether the Capstone Valley programme can proceed soundly if the M2 junction 4 improvements or Lidsing-related infrastructure is delayed.

### Community and Voluntary Organisations

- Notes the document should be considered only for the matters specifically agreed and not interpreted as a blanket endorsement of environmental impacts or mitigation arrangements

## Council Response

*The Council notes the concerns raised regarding infrastructure, sustainable transport, environmental impacts and cross-boundary matters.*
*This SoCG was prepared to assist in the Phase 1 hearing sessions of the Medway Local Plan 2041 Examination, with specific reference to question 3.8: 'How does the*

*Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites.'*

*The Council considers that Policy SA7 is:*

- *Positively prepared, as it contributes significantly towards meeting Medway's identified housing and infrastructure needs;*
- *Justified, as it is supported by a proportionate evidence base and has been considered through the assessment of reasonable alternatives;*
- *Effective, as the allocation is deliverable and supported by infrastructure planning, comprehensive masterplanning and identified mitigation measures; and*
- *Consistent with national policy, as it promotes sustainable development whilst requiring appropriate consideration of landscape, heritage, biodiversity, transport and infrastructure matters.*

# MLP/ED24D SoCG - Medway Council & Esquire Developments (Rainham Village)

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Community and Voluntary Organisations |

## Summary of representations

- Trajectory is broadly agreed with Esquire Developments regarding site RN9 but infrastructure arrangements remain uncertain.
- Provide evidence for occupation dates and build out rates.
- Explain delivery arrangements, infrastructure costs and contingencies.
- Reconcile with ED30 projections.

## Community and Voluntary Organisations

- SoCG agreement is limited to housing trajectory matters.
- Infrastructure cost, funding and delivery mechanisms remain reserved matters.

## Council Response

*The Council notes the comments regarding housing trajectory assumptions, infrastructure delivery and build-out rates.*

*This SoCG was prepared to assist in the Phase 1 hearing sessions of the Medway Local Plan 2041 Examination, with specific reference to question 3.8: 'How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?'*

*The Council's position is that the Lower Rainham allocation is a justified component of the Spatial Development Strategy and emerged from the assessment of reasonable alternatives through the Sustainability Appraisal process.*

*The allocation has been informed by a substantial evidence base, including the Landscape Character Assessment, Sustainability Appraisal, Strategic Transport*

*Assessment, heritage evidence and site assessment work. Landscape, heritage and green infrastructure considerations are embedded within Policy SA10 through requirements relating to conservation area settings, historic field patterns, landscaping, green infrastructure and the preparation of a comprehensive masterplan informed by a Rural Design Code, Open Space Strategy and Green Infrastructure Strategy. The Council considers that the proposed development can be accommodated without unacceptable impacts provided that the policy requirements are implemented through a coordinated masterplanning process.*

*The Council also considers that the allocation is deliverable. The Strategic Transport Assessment assessed the cumulative transport impacts of the four component sites and identified the necessary mitigation measures, whilst infrastructure requirements have been identified through the Infrastructure Delivery Plan and supporting evidence.*

# MLP/ED24E SoCG - Medway Council & Peel Waters (North Gillingham)

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Community and Voluntary Organisations |

## Summary of representations

### MPs, Members and Parish Councils

- Chatham Waters and Chatham Docks delivery depends heavily on market conditions, which require sensitive testing and transparent comparison with greenfield alternatives.
- Delivery assumptions indicate active promotion, but they contain explicit market and planning dependencies.
- Argues urban regeneration assumptions should be transparently assessed.
- Publish detailed delivery assumptions, consent programme and required enabling works.

## Community and Voluntary Organisations

- SoCG agreement is limited to housing trajectory matters.
- Infrastructure cost, funding and delivery mechanisms remain reserved matters.

## Council Response

*The Council notes the concerns regarding regeneration assumptions, and delivery timescales.*

*This SoCG was prepared to assist in the Phase 1 hearing sessions of the Medway Local Plan 2041 Examination, with specific reference to question 3.8: 'How does the Plan demonstrate that the housing trajectory is deliverable across the Plan period, including on strategic sites?'*

*The Council's position is that Policy SA4 remains a justified and effective strategic regeneration allocation, but would benefit from modifications to improve clarity,*

*consistency and implementation. The Council considers that these modifications would improve the effectiveness of the policy without altering the overall development strategy for the River Waterfront area.*

*The Council emphasises that the allocation is intended to be planned comprehensively through a strategic allocation-wide masterplanning process rather than through a series of isolated site proposals. Green infrastructure strategies, development briefs, masterplans and phasing plans are intended to be prepared collaboratively by developers and landowners across the allocation. The policy is also intended to operate alongside Policy DM21, such that open space requirements are not reduced, but may be delivered through an appropriate combination of on-site and off-site provision. Heritage assets, ecological interests, moorings and waterfront access have all informed the policy requirements, although the Council supports clearer references to heritage and ecological protection consistent with national policy.*

*The Council considers that the allocation is deliverable. Existing tenancy arrangements, operational uses and land ownership constraints have been factored into the latest housing trajectory and delivery assumptions. Flood risk has been comprehensively assessed through the Sequential Test, Strategic Flood Risk Assessments and site-specific flood risk work, with mitigation measures incorporated into the policy. Whilst parts of the allocation are located within Flood Zones 3a and 3b, the Council considers that development can be directed towards lower-risk areas where possible and supported by appropriate flood mitigation. Consequently, the Council concludes that Policy SA4 is justified, effective and capable of delivering a significant component of the Plan's regeneration and housing objectives.*

# MLP/ED24F SoCG - Medway Council & Barratt David Wilson Homes, Bellway Strategic Land and Brookworth Homes (Land West of Strood)

## General

Responses received: 2

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Community and Voluntary Organisations |
| E.8 | Jennifer Price | Members of the public |

## Summary of representations

### Members of the public

- Objects to aspects of the West Strood allocation arguing that the supporting evidence and Statement of Common Ground do not protect existing bungalow residents.
- Concerns focus on the site's sloping topography, which would result in significant overlooking from a two-storey development, a poor transition between new and existing development, and increased surface water runoff and flood risk.
- Request a minimum 15-metre non-developable green buffer along the boundary and a height restriction limiting development within 35m of existing properties to single-storey or low-profile chalet bungalows.

## MPs, Members and Parish Councils

- The housing delivery delay is acknowledged. However, the impact on the housing trajectory is required. Confirm incorporation into MLP/ED30.
- Maintains objections regarding Green Belt release. Explain Green Belt justification.

- Publish completed cross-boundary masterplan.
- Apparent discrepancy between references to SNF3 and SNF5. Confirm correct allocation references. Publish correction if necessary. Explain any implications.

### Community and Voluntary Organisations

- SoCG agreement is limited to trajectory matters.
- Infrastructure cost, funding and delivery mechanisms remain reserved matters.

## Council Response

*Green Belt matters are addressed separately though the Green Belt evidence, responses to the Inspectors questions and in hearing statements. Please see responses specifically to questions 5.10 and 5.11 in Medway Council's Matter 5 hearing statement.*

# MLP/ED25 Medway Local Plan - Interim Year Assessment

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |

## Summary of representations

- Argues that the Council must clearly demonstrate what highway improvements and mitigation measures will be in place when housing and employment development is occupied.
- Potential inconsistency in ED25 between the reference to 1,122 dwellings in the 2031 "Do Something" scenario and the site-specific dwelling totals shown in Table 3-11 and seeks clarification on the modelling assumptions.
- Confirm whether additional sensitivity testing is required and identify any implications for mitigation delivery timescales or housing supply.

## Council Response

*The Council notes the comments regarding the relationship between transport evidence and housing delivery assumptions. MLP/ED25 should be read alongside MLP/ED26, MLP/ED38 and MLP/ED30. Together these documents provide evidence supporting the proposed housing trajectory and associated transport infrastructure requirements. The Council is satisfied that the assessment is robust and remains valid.*

*Please see paragraphs 9.4.10 to 9.4.13 of the Council's Hearing Statement for Matter 9.*

# MLP/ED26 Medway Local Plan - Interim Year Assessment Medway 2031 Interim Junction

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |

## Summary of representations

- ED26 finds the interim A228 Peninsula Way/Main Road Hoo scheme works in 2031 but is insufficient by 2032, when the full mitigation scheme is required to maintain a nil-detriment position.
- Argues the Council must clearly demonstrate that the full Main Road Hoo scheme will be delivered and operational by 2032, rather than relying on broad references to future mitigation.
- Given the importance of the corridor to the Hoo growth strategy, seeks clear thresholds, trigger points, contingency measures and occupation controls, rather than a general commitment to monitoring.
- The tested interim scheme is not shown to be adequate beyond 2031, although this does not necessarily mean the junction will fail or that no alternative solution exists.
- Accepts the principle of phased mitigation but considers that each stage should be linked to modelled capacity thresholds and clear delivery milestones.
- State expressly whether the Council accepts ED26's Year 6 conclusion.
- Identify the scheme required by 2032, its scope, land needs, estimated cost, sources of committed and prospective funding, approvals, design programme, highway-authority responsibilities and occupation controls; and reconcile that scheme with the phased allocations and ED30.

## Council Response

*The Council notes the comments regarding transport mitigation, funding and delivery. MLP/ED26 forms part of the transport evidence supporting the Plan. The Council considers the evidence provides an appropriate basis for the proposed stepped housing trajectory and associated infrastructure developments.*

*Please see paragraphs 9.4.10 to 9.4.13 of the Council's Hearing Statement for Matter 9.*

# MLP/ED27 Medway Flood Defences High Level Appraisal

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Community and Voluntary Organisations |

## Summary of representations

### MPs, Members and Parish Councils

- Useful strategic evidence but this is not a detailed delivery strategy.
- Further work is required before flood-dependent allocations can be regarded as deliverable.
- Obtain final Environment Agency position.
- Reassess affected allocations if flood solutions remain uncertain.
- High-level appraisal is not the same as an implementable flood defence programme. Demonstrate realistic delivery routes for required flood protection.
- The final SA and housing supply evidence should take account of materially different constraints in urban and rural locations on a consistent basis.

### Community and Voluntary Organisations

- Is a high-level appraisal and not a funded final flood defence scheme. Acknowledging the need for work is not the same as demonstrating that it can be delivered at the time assumed.
- STHP does not assert that MLP/ED27 itself demonstrates an adverse effect on protected sites; the point is that the pathway has to be examined where relevant.

## Council Response

*The Council notes the representations concerning flood-defence delivery and funding arrangements. MLP/ED27 is not a detailed delivery strategy, as mentioned in the Appraisal. Its findings will inform future work with the Environment Agency. The Council remains satisfied that flood risk matters can be appropriately managed within the Local Plan framework.*

*The Council has responded to many questions regarding the Environment Agency's representations at Phase 2 hearings. Please see the Council's Matter 6 Hearing Statement and further documentation during and following the Examination hearings.*

# MLP/ED30 Medway Council: Updated Proposed stepped housing requirement and land supply

## General

Responses received: 2

| ID | Name | Stakeholder Type |
|---|---|---|
| E.118 | Gleeson Land | Developers |
| E.37 | Independent Group | MPs, Members and Parish Councils |

## Summary of representations

### Developers

- Supports the principle of a stepped trajectory but considers it unjustified until all opportunities to increase early housing delivery have been fully explored. Reassess omitted deliverable sites and demonstrates that early supply opportunities have been maximised.
- Argues the stepped approach suppresses housing delivery in the early years, increasing the risk of under-delivery against identified need. Identify additional deliverable sites to boost short- and medium-term supply.
- Sustainability Appraisal - considers the effects of delaying housing delivery have not been adequately assessed. Assess sustainability impacts and consider alternative approaches to improve delivery outcomes.
- Questions the late introduction of highways constraints as justification for the stepped trajectory and raise concerns regarding consistency with infrastructure, viability and funding evidence. Justify the highways-based approach, demonstrate alignment with infrastructure and viability evidence, and clarify transport funding and delivery arrangements.

### MPs, Members and Parish Councils

- Accepts the principle of stepped housing requirements but questions whether the evidence is sufficient to demonstrate that the proposed growth trajectory is realistic and deliverable.
- Highlights the very limited housing surplus and five-year housing land supply margin, arguing that delays could undermine delivery assumptions.

- Raises concerns about whether infrastructure provision can keep pace with planned housing growth and whether the necessary environmental assessments remain up to date.
- Demonstrate the deliverability of stepped housing growth assumptions.
- Undertake sensitivity testing to assess the impact of potential delays.
- Consider the implications for the spatial strategy if the housing surplus is lost.
- Publish site-specific evidence supporting the five-year housing land supply.
- Explain the treatment of any housing shortfall and the application of buffers.
- Show how infrastructure delivery will be linked to housing growth.
- Update the SA/SEA and HRA where required.
- Clarify how housing delivery assumptions align with transport modelling and infrastructure investment programmes.

## Council Response

*The Council notes the comments regarding the stepped housing requirement, housing supply margins and infrastructure dependencies. The updated trajectory reflects the most recent evidence available to the Council, including transport, infrastructure and delivery matters. A stepped approach provides a realistic and deliverable pathway to meeting development needs.*

# MLP/ED30A Medway Council: Explanatory Note

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |

## Summary of representations

- Concerns over robustness of stepped housing evidence and relationship to infrastructure delivery. Accepts stepped requirements can be justified but questions whether supporting evidence is robust.
- The supply margin is very narrow. Only a 140-home surplus exists across the Plan period. Delays could quickly eliminate this margin. Conduct sensitivity testing. Test impact of delays.
- Heavy dependence on allocations and promoter assumptions. Compare promoter assumptions with infrastructure programme and trajectory.
- Stepped housing does not itself prove infrastructure can be delivered. Explain how infrastructure delivery is tied to housing growth. Update SA/SEA and HRA if required.
- Growth profile must align with transport modelling and infrastructure delivery. Clarify relationship between delivery assumptions and infrastructure programmes.

## Council Response

*The Council notes the concerns regarding the robustness of the stepped housing requirement. MLP/ED30A should be read alongside MLP/ED30 and the wider evidence base. The Council considers that the revised approach appropriately reflects infrastructure delivery assumptions and represents an appropriate base for the Plan.*

# MLP/ED37 Medway Green & Blue Infrastructure Framework

## General

Responses received: 3

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| 5104 | Ray Dines | Members of the public |
| 5105 | Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx, Chair) | Community/Voluntary Organisation |
| E.200 | Save the Hoo Peninsula | Community/Voluntary Organisation |

## Summary of representations

### Members of the public

- Seeks clearer mapping and groundwater guidance.

### Community and Voluntary Organisations

- Welcomes the inclusion of references to swift boxes but requests that the wording be amended to “swift bricks” or “swift bricks/boxes” to ensure consistency with national policy and guidance, as well as the Kent Local Nature Recovery Strategy.
- Raises concerns that housing allocations near Chattenden Woods and Lodge Hill SSSI could harm nationally important nightingale populations, and that the Council has not demonstrated that alternatives to the 400m buffer will provide adequate long-term protection.
- Argues the HPSEP does not yet provide a secured, evidence-based mitigation strategy, with uncertainty around funding, delivery, land availability, timescales and accountability.
- Requests mapping of the SSSI, residential parcels and buffer zones, alongside a completed protection strategy with enforceable mitigation measures and timescales.
- Seeks publication of a fully costed HPSEP, mitigation funding and delivery schedules, and evidence of funding commitments for Hoo Peninsula allocations.

- Requests site-specific ecological impact and mitigation evidence, including for designated sites, functionally linked land, and Bird Wise/SAMMS measures.
- Calls for ecological mitigation requirements to be clearly mapped, funded, monitored and secured through policy.
- Seeks publication of Natural England's response, any updated HRA/SA work and associated policy modifications.
- Notes the Environment Agency's continuing objection to the Plan's soundness, citing concerns over flood-defence funding, phasing, delivery and ecological impacts.
- Requests further evidence on wastewater, surface-water infrastructure and water-efficiency measures, including responses from Southern Water.
- Seeks greater transparency regarding developer commitments set out in Statements of Common Ground.
- Argues allocations should be reduced, rephased or alternatives reconsidered where ecological impacts cannot be adequately mitigated.
- Requests binding policy wording to secure revised SSSI buffers and strategic and site-specific mitigation measures. Seeks clear distinction between environmental enhancements and essential mitigation required to make development acceptable.

## MPs, Members and Parish Councils

- Emphasises the environmental, heritage and landscape importance of the Hoo Peninsula. Demonstrate that growth protects or enhances these assets.
- Framework aspirations are not equivalent to funded mitigation. Link framework priorities to policies and delivery mechanisms. Explain implications for SA/SEA and HRA. Local design guidance should be properly reflected. Explain relationship between the Local Plan and neighbourhood plans/design codes.
- Distinguish enhancement projects from essential mitigation. Clarify which schemes are critical mitigation and how they will be secured.

## Council Response

*The Green and Blue Infrastructure Strategy is intended to complement other environmental measures/programmes and work to deliver the K&M Local Nature Recovery Strategy.*

*The adopted Local Plan will take precedence as most uptodate policy in relation to Neighbourhood Plans.*

# MLP/ED38 Technical Note - Further justification for stepped housing trajectory based on Strategic Transport Assessment

## General

Responses received: 1

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |

## Summary of representations

- Transport documents should be read together. Several junctions already operate near capacity. Assess infrastructure and mitigation as one integrated programme.
- Significant schemes with high estimated costs but uncertain funding and timing. Provide implementation programmes. Explain funding and delivery. Assess impacts of delays.
- Additional highway interventions depend on future delivery and approvals. Produce integrated infrastructure dependency schedule with triggers, costs and contingencies.
- Proposed monitoring approach is not yet an operational strategy.
- Publish framework, thresholds, decision points, responsibilities, reporting and contingency measures. Monitoring alone is insufficient unless linked to infrastructure delivery. Identify occupation triggers and how they would be enforced.

## Council Response

*The Council notes the comments regarding transport funding, infrastructure dependency, monitoring and delivery arrangements. MLP/ED38 provides additional justification for the proposed stepped housing trajectory in light of transport evidence and should be read alongside MLP/ED25, MLP/ED26 and MLP/ED30. The Council considers that an appropriate monitoring framework exists through the Local Plan.*

# MLP/ED39 Technical Note - Viability Assessment review of Southern Water request to consider greater water efficiency standards

## General

Responses received: 3

| ID | Name | Stakeholder Type |
|---|---|---|
| E.37 | Independent Group | MPs, Members and Parish Councils |
| E.200 | Save the Hoo Peninsula | Statutory Body |
| E.81 | Southern Water | Statutory Body |

## Summary of representations

### Statutory Consultees

- Medway should adopt a stronger water efficiency standard in light of water stress in the Southeast and recent national policy changes. It also argues that viability assessments should take account of the incentives it offers to developers.
- Update Policy DM6 (Sustainable Design and Construction) to reduce the water efficiency target from 110 litres/person/day to 100 litres/person/day.
- Ensure viability assessments take account of Southern Water's environmental incentives when assessing tighter water efficiency standards.
- Supports the proposed changes to Policy DM1, particularly measures to prevent surface water entering foul and combined sewer systems. It emphasises the role of SuDS, rainwater harvesting, and management of water at source.
- Retain the proposed amendments to Policy DM1 regarding surface water and sewer connections.
- Add an explicit requirement for compliance with the National Standards for Sustainable Drainage (Defra, June 2025) within Policy DM1.
- Ensure that SuDS are used to separate and manage rainwater and surface water at source.
- Continue to support rainwater harvesting and surface water reuse as part of sustainable drainage design.

### Community/Voluntary Organisations

- Raise wastewater and environmental capacity concerns. Any necessary mitigation should be fully evidenced, costed, funded, phased, and secured before development proceeds.

### MPs, Members and Parish Councils

- Viability work tested a 110 litres/person/day standard. Southern Water's position had not yet been received. Seeks greater clarity regarding drainage policy and water-efficiency standards.
- Publish Southern Water's response.
- Confirm water-efficiency standard.
- Clarify drainage policy wording.
- Undertake further analysis if necessary.

## Council Response

*The Council notes comments from Southern Water's regarding water efficiency standards. The water efficiency target of 100ltr/person/day has not been tested through the Council's viability assessment and therefore cannot be supported.*

*The Council also notes representations concerning wastewater infrastructure and environmental capacity. The Council considers the evidence base provides an appropriate basis for the current position. Relevant matters are addressed through the Local Plan policies, the wider evidence base supporting the Plan.*

*The Sustainability Appraisal will be updated through an addendum and consulted upon at the same time as the consultation on main modifications.*