

Hearing Statement

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 in the Plan?
- 7.1.1 The Plan sets out a quantified employment requirement and explains that the need is derived from a dedicated Employment Land Needs Assessment (B12) (ELNA). It then seeks to meet that need through a portfolio of employment allocations and strategic policies, including Policy S10 (Economic Strategy) and Policy S12 (New Employment Sites).
- 7.1.2 The Plan sets out a total requirement for approximately 52.8 hectares of employment land, supporting around 5,850 jobs over the plan period. Much of this land is already allocated, or permitted for employment uses, therefore the Plan states that Medway requires:
- 204,000 sq m of industrial floorspace; and
 - 36,500 sq m of office floorspace over the plan period to 2041.
- 7.2 How has it been demonstrated that sufficient land is identified in the Plan to meet the differing short-term and long-term economic development and employment needs of Medway over the Plan period?
- 7.2.1 The Plan demonstrates that sufficient land has been identified to meet Medway's employment needs by aligning the requirements of the Employment Land Needs Assessment (B12) with a portfolio of committed and allocated employment sites. The ELNA identifies a need for 204,000 sq m of industrial floorspace and 36,500 sq m of office floorspace, and the Plan concludes that the existing development pipeline is sufficient to meet this requirement.
- 7.2.2 In the short term, delivery is expected to come from committed schemes, particularly MedwayOne at Kingsnorth, which benefits from outline permission

for 324,450 sq m of employment floorspace and is anticipated to come forward early in the plan period. Existing employment areas, regeneration sites and town centres are also expected to support business and office growth.

- 7.2.3 For the longer term, the Plan safeguards strategic employment locations, including the Kingsnorth Expansion Area, the Isle of Grain, existing employment estates and regeneration opportunities. Policy S10 directs different employment sectors to suitable locations, ensuring provision for offices, industrial development, warehousing, port-related activities and energy uses. Collectively, these allocations are intended to provide a diverse and flexible supply of employment land throughout the plan period, although delivery is heavily reliant on the successful implementation of the major strategic sites at Kingsnorth and the Isle of Grain.

7.3 **How is the approach taken in the preparation of the Plan in this regard justified, effective and consistent with national policy?**

- 7.3.1 The Plan's economic strategy is justified through a robust evidence base, principally the Employment Land Needs Assessment (B12), which identifies the scale, type and distribution of employment land required over the plan period. It has been informed by consultation, sustainability appraisal and wider economic evidence, ensuring that it responds to local circumstances and growth opportunities.
- 7.3.2 The strategy is effective because it translates identified needs into a clear spatial framework, supported by strategic employment allocations, regeneration opportunities, protection of existing employment areas, and policies promoting business growth, investment, innovation, skills and town centre vitality. The Plan provides a diverse portfolio of sites capable of meeting a range of business requirements throughout the plan period.
- 7.3.3 The Plan's approach is consistent with national policy. In accordance with paragraphs 20(a) and 23 of the Framework, it makes sufficient provision for employment development and provides a clear strategy for bringing forward the land required to meet identified needs over the plan period. Paragraph 86 is reflected through the establishment of a clear economic vision and strategy, the identification of sites to support investment and growth, and a flexible approach capable of responding to changing economic circumstances. The strategy also accords with paragraph 87 by recognising the differing needs and locational requirements of economic sectors, including industries of local, regional and national importance. Through the allocation of employment land alongside supporting infrastructure, the Plan supports sustainable economic growth, productivity and the creation of sustainable communities across Medway.

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?
- 7.4.1 The Council demonstrates that the scale, type, location and phasing of employment land proposed in the Plan is aligned with market demand, infrastructure capacity and Medway’s future economic needs through a clear ‘*protect, regenerate, and allocate*’ strategy informed by the Employment Land Needs Assessment (B12). The ELNA identifies both quantitative and qualitative employment land requirements, assesses market signals and property sector demands, and provides the evidence base for the level and distribution of employment provision proposed in the Plan.
- 7.4.2 The strategy is implemented through Policies S10-S14, which safeguard established employment locations, support the renewal and intensification of existing employment areas, and allocate a portfolio of new sites capable of accommodating a range of employment uses and business sectors. The spatial distribution of allocations reflects the differing locational requirements of industries, including access to strategic transport networks, ports, town centres and existing economic clusters.
- 7.4.3 Infrastructure requirements have been considered alongside site selection and growth proposals through the Plan-making process, the supporting evidence base and infrastructure planning work. This is demonstrated by the Infrastructure Delivery Plan (B2), including the Infrastructure Delivery Schedule, which identifies the infrastructure interventions required to support the Plan, including transport, utilities, education, health, community and green and blue infrastructure, together with indicative costs, phasing and priorities.
- 7.4.4 The approach is also supported by the Strategic Transport Assessment (B18.1), which tests the implications of Local Plan growth and identifies mitigation required to accommodate development, concluding that the proposed growth can be accommodated subject to the delivery of identified mitigation measures.
- 7.4.5 The phased supply of protected, modernised and newly allocated employment land is justified by the Employment Land Needs Assessment (B12) and the Site Selection Topic Paper (B22.1), which together demonstrate the need for additional employment land and floorspace, explain how suitable, available and achievable sites were identified and selected, and support a flexible portfolio of

sites capable of responding to changing market conditions throughout the plan period.

- 7.4.6 Accordingly, the strategy is justified by proportionate evidence, effective in supporting delivery, and consistent with the Framework, particularly paragraphs 20(a), 20(b), 23, 86 and 87, which require strategic policies to make sufficient provision for employment and infrastructure, provide a clear strategy for bringing land forward, support a positive economic vision, address barriers to investment and growth, and recognise the differing locational requirements of modern businesses and economic sectors.

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?

- 7.5.1 Yes. The Plan demonstrates that sufficient employment land is available throughout the plan period through the evidence and conclusions of the Employment Land Needs Assessment (B12) and the employment strategy set out in Chapter 7. Delivery is secured through Policy S10 (Economic Development Strategy), which adopts a ‘*protect, regenerate, and allocate*’ approach; Policy S11, which safeguards existing employment areas; and Policy S12, which allocates new employment land through strategic development sites and mixed-use allocations. The Plan’s employment provision is further supported by site-specific policies in Chapter 14, which identify the location and quantum of employment development to be delivered as part of strategic allocations. Collectively, safeguarded employment areas and proposed allocations provide an adequate supply of land and capacity to support forecast employment growth across Medway over the Plan period.

7.6 How has the need for employment land been identified and quantified?

- 7.6.1 The need for employment land has been identified and quantified through the Employment Land Needs Assessment (B12), which forms the principal evidence base for the Plan’s economic strategy. The ELNA assessed future employment requirements using a range of recognised methodologies, including labour demand forecasts, labour supply forecasts linked to housing growth, commercial market analysis and past take-up trends. It also reviewed Medway’s existing employment stock, vacancy rates, market signals and the availability of existing and committed employment sites.
- 7.6.2 The assessment identified a need for approximately 204,000 sq m of industrial floorspace (around 51 hectares) and 36,500 sq m of office floorspace over the period to 2041. In reaching its conclusions, the ELNA considered alternative growth scenarios and recommended that the Council plan for the higher, more positive industrial requirement, reflecting market demand and the availability of

strategic employment opportunities in Medway. This approach is set out in the Executive Summary and paragraph 5.47 of the ELNA (B12).

7.6.3 The findings of the ELNA informed the employment strategy in the Plan, including Policy S10, and the allocation of new employment sites (Policy S12). The Plan provides a portfolio of protected, regenerated and newly allocated employment land to meet identified needs, support a range of business sectors and maintain flexibility over the plan period. The site selection process is explained in the Site Selection Topic Paper (B22.1) and was principally guided by the Land Availability Assessment (B1) along with the wider evidence base.

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?

7.7.1 The deliverability of the proposed employment sites is demonstrated through a combination of evidence on market demand, committed supply, planning status and infrastructure provision. The Employment Land Needs Assessment (B12) identifies a requirement for industrial floorspace and office floorspace and concludes that Medway has a substantial pipeline of committed and allocated employment land capable of meeting that need. Paragraph 7.8 notes that over 533,000 sq m of committed employment floorspace already benefits from planning permission and concludes that this supply, on its own, is sufficient to meet identified employment requirements. Tables 7.1 to 7.3 demonstrate that the committed and allocated supply significantly exceeds forecast need, providing flexibility and resilience in the market.

7.7.2 The proposed employment allocations are supported through Policy S12 (New Employment Sites) and Policy SA14 (Employment Sites), which identify specific sites including MedwayOne (HHH36), Kingsnorth Expansion Area (HHH35), Innovation Park Medway (FH1), Cuxton Pit 1 (CHR16), Cuxton Pit 2 (CHR17) and Basin 3 Campus (SMI6). The supporting text explains that many of these sites already benefit from planning permissions or are strategic opportunities with established landowner support and clear development trajectories. Paragraphs 7.4.3-7.4.4 confirm that the Plan's strategy combines the retention and enhancement of existing employment areas with the allocation of new sites capable of accommodating future business growth.

7.7.3 Market demand has been assessed through the ELNA's (B12) review of employment land take-up, vacancy rates, occupier requirements, developer consultation and site assessments (Chapter 4, pp. 29-44). The assessment notes that existing employment areas are generally well occupied, with only around 13 months' supply of available industrial and warehouse floorspace,

indicating a relatively tight market (paragraphs 4.53 and 4.62, pp. 37-39). It also identifies qualitative deficiencies in parts of the existing stock, particularly at Medway City Estate, whilst concluding that there remains demand for modern employment space capable of meeting contemporary occupier requirements (paragraphs 4.13-4.15, pp. 29-30; paragraph 4.62, pp. 39-40). The ELNA specifically identifies MedwayOne/Kingsnorth, Grain and Innovation Park as key locations capable of accommodating future employment growth and investment. Chapter 7 concludes that these sites are suitable and attractive to developers and occupiers and form part of a substantial committed and allocated supply capable of meeting future employment needs (paragraphs 7.10-7.16, pp. 60-62).

7.7.4 Infrastructure delivery has been considered through the Infrastructure Delivery Plan (B2) and supporting transport evidence, whilst the Sustainability Appraisal (A3.2) tested alternative growth and spatial strategies and concluded that the preferred approach provides a sustainable framework for accommodating employment growth. Taken together, the evidence demonstrates that the proposed employment sites are available, deliverable, supported by market demand and capable of being served by the infrastructure necessary to support development over the plan period.

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?](#)

7.8.1 The Economic Strategy has been developed to respond to changing economic conditions, business needs and working practices over the plan period. The Employment Land Needs Assessment (B12) recognises uncertainty in future office demand, evolving workplace patterns and wider economic change, and concludes that the Plan should retain flexibility to accommodate future employment needs as market conditions evolve (paragraph 1.10). It also tests a range of growth scenarios and recommends planning for the higher industrial land requirement, reflecting market demand and ensuring an adequate supply of land to support future growth (paragraph 5.47). The ELNA further identifies a substantial pipeline of employment land and floorspace capable of providing choice and flexibility for businesses (Chapter 7).

7.8.2 These findings are reflected in the Plan, which identifies sufficient land to meet employment needs and support a range of business sectors (paragraph 1.3.8), recognises the strategic economic role of Grain and Kingsnorth in accommodating emerging sectors (paragraph 3.1.6), promotes sustained economic growth through a mixed portfolio of employment sites (paragraph 3.1.8), and provides a strategy of retaining, modernising and allocating

employment land to meet changing market requirements (paragraphs 7.4.3-7.4.4).

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?

7.9.1 The effectiveness of the Economic Strategy will be monitored as set out in the Monitoring Framework (A14) and annual Authority Monitoring Reports (as per A15.1 and A15.2), which assess the delivery and performance of Local Plan policies. The Infrastructure Delivery Plan (B2) is also a 'live' document that will be reviewed and monitored alongside the Authority Monitoring Report process.

7.9.2 The Plan has been written so as to provide flexibility through a portfolio of protected, regenerated, and newly allocated employment sites, supported by a substantial supply of committed employment land and floorspace identified in the Employment Land Needs Assessment (B12). This enables the Council to respond to changing market conditions and investment patterns over the plan period.

7.9.3 If monitoring indicates that job growth, employment land delivery or investment levels are falling below expectations, the Council can review its evidence base, reassess site allocations and phasing, update infrastructure priorities, and bring forward policy changes through future reviews of the Local Plan.

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?

7.10.1 The economic strategy was tested through a comprehensive assessment of reasonable alternatives in the Sustainability Appraisal - Regulation 19 Report (A3.2). Paragraphs 5.2.1-5.2.2 explain that reasonable alternatives were identified through consultation, stakeholder engagement, assessment of key issues and the evidence base, and were evaluated through the SA process. The appraisal considered alternative growth options, spatial delivery options and spatial growth strategies (paragraph 5.2.3 and Figure 5.2).

7.10.2 In relation to the scale of growth, the Sustainability Appraisal (A3.2) assessed alternative growth scenarios at both Regulation 18 and Regulation 19 stages (Tables 5.1 and 5.2). At Regulation 19, Option 3 tested the delivery of Medway's objectively assessed housing and employment needs, including approximately 24,540 dwellings and 240,500m² of employment floorspace, whilst Option 4 tested a higher growth scenario incorporating a potential contribution towards

unmet needs arising elsewhere. Paragraphs 5.3.5 and 5.3.6 conclude that Option 3 represented the best-performing option overall because it would meet Medway's identified housing and employment needs without placing unnecessary pressure on environmental assets, infrastructure capacity or social infrastructure. The appraisal also incorporated the requirements identified in the Employment Land Needs Assessment (B12), including the need for approximately 204,000 sq m of industrial floorspace and 36,500 sq m of office floorspace (paragraph 5.3.5).

7.10.3 The SA further assessed three alternative spatial growth strategies. Paragraph 5.5 and Table 5.5 identify the Urban Regeneration Focus, Dispersed Growth and Blended Strategy options, all of which could theoretically meet Medway's housing and employment requirements. However, the appraisal concluded that the Blended Strategy provided the most sustainable balance. As explained in the assessment accompanying Table 5.6, the Blended Strategy combines urban regeneration with suburban and rural development, helps provide a diverse range of housing types, meets economic needs and directs the majority of growth to sustainable locations. Table 5.6 identifies the Blended Strategy as the best-performing option against housing, health and wellbeing, education, and notably economy and employment (SA Objective 12). The Council's conclusion confirms that the preferred strategy continues to reflect a blended approach informed by the assessment of sustainability effects and land availability evidence.

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?

7.11.1 The Employment Land Needs Assessment (B12) assessed future requirements using labour demand forecasts, labour supply forecasts, commercial market analysis and past take-up trends (paragraph 1.10). It concluded that Medway should plan for approximately 204,000 sq m of industrial floorspace (around 51 hectares) and 36,500 sq m of office floorspace, and identified a substantial portfolio of existing, committed and allocated employment land capable of meeting those needs. Paragraph 5.47 specifically recommends planning for the higher requirement based on past trends, reflecting market demand and development opportunities in Medway.

7.11.2 Chapter 7 of the ELNA (B12) demonstrates that retained employment areas, together with committed permissions and strategic locations including Grain, Kingsnorth, Innovation Park Medway and Chatham Docks, provide significant employment capacity and flexibility. The assessment identifies over 500,000 sq

m of committed employment floorspace with planning permission and concludes that the available supply is sufficient to meet forecast needs.

7.11.3 Paragraph 1.3.8 of the Local Plan identifies the employment floorspace requirements and confirms that the Plan provides a portfolio of sites to meet the needs of different sectors, whilst paragraphs 7.4.3-7.4.4 establish a strategy of retaining, modernising and, where necessary, allocating additional employment land. The distribution of employment growth has also been tested through the Sustainability Appraisal (A3.2), which found that the preferred Blended Strategy provides the most sustainable balance and performs strongest against SA Objective 12 (Economy and Employment) – see for example Table 5.6.

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?

7.12.1 The Council assessed existing employment sites through the Employment Land Needs Assessment (B12), Land Availability Assessment (B1), Site Selection Topic Paper (B22.1) and Sustainability Appraisal process. The ELNA (B12) reviewed Medway's employment land portfolio, market conditions, vacancy rates, take-up trends, business demand and the future role of key locations, including Grain, Kingsnorth, Innovation Park Medway, Chatham Docks and Medway City Estate, to understand their attractiveness to different sectors and their capacity to support future growth.

7.12.2 The strategy was not based solely on historic allocations. Paragraphs 7.4.3-7.4.4 of the Local Plan explain that employment sites were reviewed to determine where they should be retained, enhanced, consolidated or supplemented by new allocations to better meet modern market requirements. The ELNA also concludes that established employment locations perform an important economic function and that a range of sites should be retained to provide flexibility, choice and resilience in the market. (see ELNA (B12): Executive Summary; paragraph 1.10; paragraphs 5.35 and 7.8-7.10)

7.12.3 Site suitability, availability and achievability were assessed through the Land Availability Assessment (B1) and the process described in the Site Selection Topic Paper (B22.1). The wider distribution of employment land was then tested through the Sustainability Appraisal (A3.2), which assessed alternative spatial strategies and concluded that the preferred Blended Strategy offered the most sustainable balance whilst performing strongest against SA Objective 12 (Economy and Employment).

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?

7.13.1 The Council's evidence indicates that the redevelopment (loss) of some existing employment sites for alternative uses would not, in itself, undermine delivery of the Plan's Economic Strategy because the ELNA (B12) concludes that employment needs can be met through the combination of committed, allocated and strategic employment sites across Medway. Table 7.1 identifies 533,512 sq m of committed industrial floorspace with planning permission, and paragraph 7.8 concludes that this supply alone is sufficient to meet identified employment needs, providing flexibility and resilience within the employment land portfolio.

7.13.2 The Plan's economic strategy is therefore not dependent upon the retention of every existing employment site. Instead, it relies on a wider portfolio of retained, regenerated and newly allocated employment land, including strategic opportunities at Grain, Kingsnorth, Innovation Park Medway and Chatham Docks. While the ELNA advises against the wholesale loss of employment land, it does not conclude that the redevelopment of individual sites would prejudice economic growth objectives:

"Despite a large supply of land in the pipeline we do not recommend de-allocating existing sites. This is because new land is not substitutable for built space and especially space at secondary rents." (ELNA: Executive Summary, page 4)

7.13.3 This is reflected in the Local Plan strategy at paragraphs 7.4.3-7.4.4, which combines the protection and modernisation of key employment areas with significant new employment provision. The Sustainability Appraisal (A3.2) (*Page 33, Section 5.5 Spatial Growth Options*) further supports this approach, finding that the preferred Blended Strategy best balances regeneration and economic growth objectives and performs most strongly against the objective relating to the economy and employment.

7.13.4 Moreover, the ELNA (B12) concludes that Medway benefits from a significant pipeline of committed and allocated employment land, including strategic opportunities at Grain, Kingsnorth, Innovation Park Medway and Chatham Docks. Paragraph 5.47 and Chapter 7 conclude that the available supply is sufficient to meet forecast needs whilst providing flexibility and choice in the market.

7.13.5 The ELNA specifically considered locations undergoing regeneration and recommends against the wholesale de-allocation of employment land,

recognising that established employment premises continue to perform important economic functions and that a range of sites is needed to meet differing business requirements. Chapter 7 of the ELNA (B12) identifies 533,512 sq m of committed industrial floorspace with planning permission (Table 7.1). Paragraph 7.8 describes this as a considerable supply and concludes that the committed floorspace, on its own, is sufficient to meet identified employment needs, providing flexibility and resilience in the overall employment land portfolio.

7.13.6 Therefore, in the Local Plan, at paragraphs 7.4.3-7.4.4 there is a strategy of retaining and modernising existing employment areas whilst allocating new sites to meet future needs. The Plan therefore does not rely solely on retained employment land, but on a balanced approach of protection, intensification, regeneration and new provision.

7.13.7 The wider implications of redevelopment were also tested through the Sustainability Appraisal (A3.2). Section 5.5, Tables 5.5 and 5.6 assessed alternative spatial strategies and concluded that the preferred Blended Strategy provided the most sustainable balance between regeneration, economic growth and environmental objectives, whilst performing strongest against SA Objective 12 (Economy and Employment).

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?](#)

7.14.1 Policy S11 provides flexibility by protecting a broad range of established employment locations whilst allowing their continued evolution to meet changing business needs and market conditions. The supporting text to the Plan explains that the employment strategy is based on retaining existing employment sites where appropriate, whilst supporting their enhancement, modernisation and consolidation to better meet market requirements (paragraph 7.4.3). The strategy therefore recognises that employment areas must be capable of adapting over time rather than remaining unchanged.

7.14.2 This approach is supported by the Employment Land Needs Assessment (B12), which highlights uncertainty around future economic conditions, office demand and working practices, and identifies the need to maintain flexibility throughout the plan period (paragraph 1.10). The ELNA also advises against wholesale de-allocation of established employment sites, noting that existing premises perform important economic functions and that a range of locations and site types is required to provide market choice, competition and flexibility. The assessment identifies strategic opportunities at locations including Grain, Kingsnorth, Innovation Park Medway and Chatham Docks, alongside a

substantial committed supply of employment floorspace (Chapter 7; paragraphs 7.8-7.9).

7.15 How does the Plan address the needs of existing local businesses and key economic sectors?

7.15.1 The Plan addresses the needs of existing businesses and key economic sectors through a strategy of protecting, regenerating and expanding the employment land portfolio. The Employment Land Needs Assessment (B12) examined market demand, sectoral trends, vacancy rates and business requirements, identifying the need for additional industrial floorspace and office floorspace, whilst recognising opportunities in logistics, advanced manufacturing, low-carbon energy, data centres and innovation-led sectors. The ELNA also identifies strategic opportunities at Grain, Kingsnorth and Innovation Park Medway and recommends maintaining a range of sites to provide market choice and flexibility.

7.15.2 These findings are reflected in the Local Plan. Paragraph 1.3.8 confirms that the Plan provides a portfolio of sites to meet the needs of different business sectors, whilst paragraphs 7.4.3-7.4.4 establish a strategy of retaining and modernising existing employment areas and allocating new employment land. The Plan also recognises the strategic economic role of Grain and Kingsnorth in supporting emerging and growth sectors (paragraphs 1.3.8 and 3.1.6).

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?

7.16.1 The continued performance of employment areas will be monitored through the Monitoring Framework (A14) and annual Authority Monitoring Reports (as per A15.1 and A15.2), which assess the effectiveness of Local Plan policies and track employment land delivery. The Infrastructure Delivery Plan (B2) is also intended to be a 'live' document, reviewed regularly through the monitoring process.

7.16.2 The Plan incorporates flexibility through a substantial portfolio of existing, committed and allocated employment land. The Employment Land Needs Assessment (B12) identifies a need for approximately 204,000 sq m of industrial floorspace and 36,500 sq m of office floorspace, but also confirms a committed supply of over 533,000 sq m of employment floorspace (Chapter 7; Table 7.1), providing resilience and flexibility should market conditions change.

7.16.3 If monitoring indicates an under-supply of employment land or floorspace, the Council can review its evidence base, site allocations, phasing and infrastructure priorities through future reviews of the Local Plan. Equally, if

evidence demonstrates an over-supply, monitoring can inform future policy and allocation reviews. This approach is consistent with the ELNA's emphasis on maintaining flexibility and responding to changing economic conditions over the plan period.

7.17 Are all existing employment sites accurately reflected on the policies map?

- 7.17.1 The submitted Policies Maps include an Existing Employment Area designation, and the principal strategic employment allocations, including Kingsnorth/MedwayOne and the Roman Way/Cuxton employment sites, are reflected through site allocation references. However, as in the Council's response to 1.18, National Grid's Regulation 19 representations called for the Grain LNG facility to be included in the 'Existing Employment Area' designation. The Council is proposing that the Policies Map is subject to the Inspectors' consideration of the main modifications set out in the Council's response to 1.18.

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?

- 7.18.1 The economic strategy set out in the Plan is underpinned by a broad and proportionate evidence base that has been prepared to inform both the scale and distribution of future economic growth. Central to this is the Employment Land Needs Assessment (B12), which assesses the future demand for industrial, warehousing and office floorspace and provides recommendations on the amount and type of employment land required over the plan period. This evidence is supported by the Land Availability Assessment (B1), which identifies potential development opportunities across the authority area; the Infrastructure Delivery Plan (B2), which considers the infrastructure necessary to support growth; the Viability Assessment (B5); the Sustainability Appraisal (A3.1-A3.3); the Habitats Regulations Assessment (A4.1-A4.3); and a range of transport, environmental and site assessment evidence contained in the Examination Library. Together, these documents provide a robust framework for understanding employment needs, testing possible sites and assessing the consequences of the proposed pattern of development.
- 7.18.2 The Plan explains that the Employment Land Needs Assessment identifies a requirement for approximately 204,000 sq m of industrial floorspace and 36,500 sq m of office floorspace across the plan period. This translates into a need for around 240,000 sq m of employment floorspace overall, requiring approximately 52.8 hectares of employment land and supporting the creation of around 5,850

jobs. The assessment draws upon economic forecasts, labour market analysis, property market evidence and an examination of existing employment land supply, providing a clear justification for the level of employment growth planned for Medway.

- 7.18.3 The Local Plan responds to this evidence through a balanced portfolio of employment locations rather than reliance upon any single site or sector. In particular, Policy S10 seeks to direct different forms of employment development to locations that best reflect their operational and market requirements. Office-based development is focused in Medway's centres and regeneration areas, whilst industrial and warehousing development is directed towards locations with appropriate access to the strategic transport network. The strategy also recognises the importance of the Hoo Peninsula and the Thames Estuary corridor for larger-scale industrial, energy and port-related activities, including opportunities associated with Kingsnorth and Grain. This approach demonstrates that the Plan has considered not only the overall quantity of employment land required, but also the differing locational needs of individual economic sectors.
- 7.18.4 The evidence supporting site allocations is equally important. The Land Availability Assessment (B1) provides the basis for understanding the potential supply of land, whilst the Council's site assessment and selection work identifies those locations considered suitable, available and achievable. Allocations include sites expected to be deliverable in the short term, alongside longer-term opportunities capable of contributing to employment growth throughout the plan period. This evidence is translated into the spatial strategy through Policy S12, which allocates employment sites shown on the Policies Map to meet the needs identified in the ELNA. Supporting paragraphs 7.4.1 to 7.4.4 explain that the Plan will meet identified employment needs through a combination of retained employment areas, enhanced and intensified existing sites, and new strategic employment opportunities, including at Kingsnorth. Policy S12 is implemented through Policy SA14, which identifies specific employment allocations and their anticipated contribution to future employment growth.
- 7.18.5 The relationship between new employment allocations and supporting infrastructure is further addressed through the Infrastructure Delivery Plan (B2), ensuring that growth proposals have been assessed against infrastructure requirements and delivery considerations.
- 7.18.6 The overall strategy is strengthened by policies that safeguard existing employment areas, support redevelopment and intensification where appropriate, and provide flexibility to respond to changing market conditions. In

combination, the Employment Land Needs Assessment, Land Availability Assessment, Infrastructure Delivery Plan, Viability Assessment, Sustainability Appraisal and Habitats Regulations Assessment demonstrate that the Plan has made appropriate provision for forecast employment needs, identified a realistic land supply and distributed growth in a manner that reflects economic, infrastructure, environmental and sustainability considerations. On that basis, the Plan should be regarded as positively prepared, justified and supported by an adequate evidence base in relation to the quantity, type and location of employment land, subject to detailed examination of any site-specific issues.

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.

7.18.7 Referring to Policy SA14 employment allocations and supporting ELNA evidence, the following schedule has been prepared. Where access arrangements are not explicitly stated in policy and supporting text, the likely strategic access route is identified using the supporting evidence and policy context. A distinction is also made between allocations that function as net new employment growth and those that may accommodate displacement from the Frindsbury Peninsula / Medway City Estate (MCE).

SITE	REF	USE CLASSES	INDICATIVE FLOORSPACE	ACCESS STRATEGY	DELIVERY PROSPECTS	RELATIONSHIP TO FRINDSBURY / MCE
CUXTON PIT 1	CHR16	E(g)(iii), B2, B8, employment sui generis	25,300 sqm	Via Cuxton / Medway Valley road network	Medium-term (Years 6-10)	Potential relocation destination for displaced industrial occupiers given later-phase delivery.
CUXTON PIT 2	CHR17	E(g)(iii), B2, B8, employment sui generis	14,600 sqm	Via Cuxton / Medway Valley network	Medium-term (Years 6-10)	Could contribute to wider industrial relocation capacity.
3 ACRE FIELD	CHR18	E(g)(iii), B2, B8, employment sui generis	3,500 sqm	Local highway access	Medium-term (Years 6-10)	Small-scale local employment capacity.
INNOVATION PARK MEDWAY	FH1	E(g)(iii), B2	32,248 sqm	Rochester Airfield / Junction 3 M2 corridor	Early and medium term. Market review suggests re-scoping toward higher-quality industrial and advanced manufacturing	Limited displacement role due to focus on higher-value space.

					premises rather than office-led development.	
DEANGATE RETAIL PARK (FLANDERS FARM)	HHH19	B2	14,400 sqm	A228 / Hoo Peninsula network	Early phase (Years 1-5).	Some opportunity for business relocation, although scale is relatively modest.
KINGSNORTH EXPANSION AREA	HHH35	E(g)(iii), B2, B8, employment sui generis	157,000 sqm	Directly related to Peninsula Way / A289 / M2 corridor serving Kingsnorth.	Long-term allocation (11+ years). Development intentionally sequenced after brownfield sites.	Principal displacement allocation. Policy explicitly states it should support the managed release and relocation of businesses from Medway City Estate in accordance with the Frindsbury Peninsula Planning Framework.
MEDWAYONE (FORMER KINGSNORTH POWER STATION)	HHH36	E(g)(iii), B2, B8, employment sui generis	324,450 sqm	Peninsula Way / A289 / M2. Existing strategic employment location.	Strongest delivery prospect. Benefit of outline planning permission (MC/21/0979), remediation underway and anticipated early in the plan period.	Major brownfield employment growth opportunity and likely first destination for occupier expansion and relocation demand.
LAND ADJACENT ROYAL MAIL DEPOT, MAIDSTONE ROAD	RWB5	E(g)(iii), B2, B8, employment sui generis	3,693 sqm	Maidstone Road / urban road network	Medium-term (Years 6-10).	Limited displacement capacity.
BASIN3 CAMPUS, CHATHAM WATERS	SMI6	E(g)(iii), B2, B8 and employment sui generis	31,000 sqm	Chatham Docks / dockside road network	Early phase (Years 1-5), although ELNA notes legal challenge introduces uncertainty.	Primarily replacement and regeneration space, likely better suited to cleaner industries than heavy industrial occupiers.

Frindsbury Peninsula / Medway City Estate displacement implications

7.18.8 The ELNA recommends that any long-term managed release of Medway City Estate should only occur where suitable alternative sites are available to decant existing occupiers. It identifies Medway City Estate as constrained by flood risk,

poor access, ageing stock and lack of investment, although occupancy remains strong.

7.18.9 The principal receiving locations for displaced MCE businesses appear to be:

- Kingsnorth Expansion Area (HHH35) – explicitly identified in Policy SA14 as having regard to the managed release and relocation of businesses from MCE.
- MedwayOne (HHH36) – large brownfield strategic employment scheme with 324,450 sqm capacity and early delivery prospects.
- Cuxton Pit allocations – secondary relocation destinations capable of accommodating industrial and logistics uses.
- Flanders Farm and Basin3 – more limited roles, depending upon final occupier requirements and site specifications.

7.18.10 Overall, the allocation strategy is to permit a phased restructuring of employment land in Medway, with MedwayOne providing early brownfield capacity and Kingsnorth Expansion Area providing the longer-term strategic relocation land required to facilitate Frindsbury Peninsula regeneration and any managed release of Medway City Estate businesses.

7.19 [How were the proposed new employment sites selected, and why are they considered the most appropriate locations when compared with reasonable alternatives?](#)

7.19.1 As set out in the Site Selection Topic Paper (B22.1), the proposed employment sites were selected through a combination of the Land Availability Assessment (B1), Employment Land Needs Assessment (B12) and were tested through the Sustainability Appraisal (A3.2). Sites were assessed for suitability, availability, achievability, market attractiveness and their ability to accommodate identified employment needs. Strategic locations such as MedwayOne/Kingsnorth, Innovation Park Medway, Basin 3 Campus and the Cuxton Pit sites were identified as capable of delivering significant employment growth and supporting key sectors.

7.19.2 Reasonable alternatives were tested through both site assessment and wider spatial strategy appraisal. The Sustainability Appraisal evaluated alternative growth strategies and concluded that the preferred Blended Strategy performed best overall, particularly against economy and employment objectives, whilst also balancing environmental, infrastructure and social considerations. The selected employment allocations are therefore considered the most appropriate because they align with evidenced market demand, are deliverable, and support the Plan's sustainable growth strategy.

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?

7.20.1 The Council assessed site availability and landowner support, market demand, infrastructure planning, and detailed site assessment.

7.20.2 In relation to availability and landowner commitment, the Site Selection Topic Paper (B22.1) sets out how the Land Availability Assessment (B1) identifies the SA14 allocations as available and developable, whilst Chapter 7 of the Plan notes that a number of the allocations form part of established strategic projects or benefit from planning permissions and active promoter support, providing clear development trajectories. This includes strategic locations such as MedwayOne/Kingsnorth, Innovation Park Medway and Basin 3 Campus.

7.20.3 Market demand is evidenced through the Employment Land Needs Assessment (B12), which reviewed take-up rates, vacancies, occupier requirements, developer consultation and commercial market conditions. The ELNA found a relatively tight industrial market with limited available supply and identified continuing demand for modern employment premises, specifically highlighting locations such as Kingsnorth/MedwayOne, Innovation Park and Grain as suitable locations for future growth.

7.20.4 Regarding infrastructure and constraints, the allocations were assessed through the Sustainability Appraisal (A3.2), Land Availability Assessment and site selection process. The preferred "Blended Strategy" was selected because it could accommodate identified employment growth whilst balancing environmental, infrastructure and sustainability considerations better than the reasonable alternatives tested. The fact that the sites were carried forward into Policy SA14 indicates that no overriding constraints were identified that would prevent their development, subject to the infrastructure and mitigation measures set out in the Plan's strategic and site-specific policies.

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?

7.21.1 The Council has considered infrastructure delivery at both the strategic and site-specific levels.

7.21.2 The ELNA (B12) explains that the selection and assessment of employment locations reflect the locational and infrastructure requirements of modern businesses. It notes that logistics facilities of regional and national significance require sites with good access to strategic transport networks, sufficient power supply and an appropriate labour force (paragraphs 2.19-2.22). The assessment

identifies Kingsnorth, the Isle of Grain and Innovation Park as key components of Medway's employment land portfolio (paragraph 1.10) and highlights their existing strategic advantages. The Isle of Grain benefits from nationally significant energy infrastructure, including Grain LNG and the Grain Combined Heat and Power Station (paragraphs 4.17-4.18), whilst Kingsnorth and MedwayOne benefit from access to the A228, A289 and M2 and the availability of large development plots and power infrastructure (paragraphs 4.19-4.22). Innovation Park is identified as part of the North Kent Enterprise Zone and already contains the Innovation Centre and a data centre (paragraphs 4.42, 2.37-2.43)

7.21.3 The ELNA also records that Medway's economic strategy seeks to "deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services" as a core strategic objective of the emerging Local Plan (paragraph 2.32). The assessment further notes that industrial land should be directed towards locations with strategic road access (paragraph 2.34) and concludes that Kingsnorth provides a major opportunity for development because of its land availability, infrastructure and established employment function (paragraph 4.58).

7.21.4 At a plan-making level, infrastructure requirements and constraints were tested through the Sustainability Appraisal (A3.2) and site assessment process. The preferred growth strategy was selected because it was considered capable of accommodating planned growth whilst balancing infrastructure, environmental and sustainability considerations. The employment allocations were therefore only taken forward where the evidence indicated that necessary infrastructure could be provided and no overriding constraints had been identified.

7.22 If one or more strategic employment allocations fail to come forward as anticipated, what flexibility exists in the Plan to ensure that economic growth objectives can still be achieved?

7.22.1 The ELNA (B12) concludes that Medway has a very large employment land pipeline, with the overall supply significantly exceeding the identified need. Against a minimum industrial requirement of approximately 204,000 sq m, the Council has identified around 883,000 sq m of potential employment floorspace through commitments and allocations, providing more than four times the assessed requirement (ELNA paragraphs 7.13-7.15, Table 7.3).

7.22.2 Importantly, the ELNA acknowledges uncertainty over the timing and ultimate form of development at major strategic locations such as MedwayOne and Grain Road, but notes that even if some strategic sites do not deliver as expected, there remains a wide range of alternative sites distributed across Medway (Executive Summary; paragraphs 7.7-7.8, 7.15).

7.22.3 The evidence identifies more than 533,000 sq m of extant permitted employment floorspace across multiple locations, including Innovation Park, Basin 3, National Grid Grain Road, BAE Systems, London Medway and numerous smaller sites (Table 7.1). In addition, the ELNA concludes that the committed permissions alone are sufficient to meet identified needs, before taking account of allocated land at MedwayOne and the Roman Way sites (paragraph 7.8).

7.22.4 The ELNA therefore concludes that the existing supply "*can continue the growth trajectory and could accommodate higher growth*" and that there is no need to increase industrial land provision because the portfolio already provides substantial flexibility, resilience and choice (paragraphs 7.15-7.16, 8.8-8.14).

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?*

7.23.1 The ELNA (B12) concludes that this provides flexibility, choice and resilience should delivery rates or market conditions change.

7.23.2 The continued performance of employment areas and allocations will be monitored through the Monitoring Framework (A14) and annual Authority Monitoring Reports (as per A15.1 and A15.2), which assess the effectiveness of Local Plan policies and track employment land and floorspace delivery. The Infrastructure Delivery Plan (B2) is also intended to be a 'live' document that will be reviewed and updated through the monitoring process. Together, these mechanisms will enable the Council to monitor the take-up, delivery and performance of allocated employment sites and assess whether the Plan's economic objectives are being achieved.

7.23.3 If monitoring identifies that employment land or floorspace is coming forward more slowly than anticipated, the Council can review its evidence base, site allocations, phasing assumptions and infrastructure priorities through future Local Plan reviews. Conversely, if monitoring indicates an oversupply, the evidence can inform future policy revisions and allocation decisions. This approach is consistent with the ELNA's emphasis on maintaining flexibility and responding positively to changing economic circumstances throughout the plan period, including uncertainties surrounding the timing and delivery of major strategic sites.

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?*

7.24.1 Policy T12 is justified by a clear and proportionate evidence base which identifies both existing skills deficiencies and the future workforce requirements needed to

support Medway's planned growth. The Medway Skills and Employability Plan 2035 states that Medway is expected to accommodate around 17,000 additional jobs and substantial population growth by 2035, and concludes that these ambitions will depend upon maintaining an "excellent skills base" that matches business demand and supports higher-value economic activity (pages 2 and 4). The Plan's vision is to ensure that local people have the skills and experience required to access jobs created through growth and inward investment, whilst supporting the Council's ambition to increase GVA and economic productivity.

- 7.24.2 The evidence identifies several labour market challenges. Medway's economic profile shows that only 31% of the working-age population possess qualifications at Level 4 or above (page 7). Priority sectors are identified as advanced manufacturing and engineering, construction, IT and digital, health and social care, and creative and cultural industries, with each sector experiencing particular workforce shortages and future skills requirements linked to technological change, digitalisation, robotics, low-carbon growth and demographic change (page 12).
- 7.24.3 Business consultation undertaken as part of the Plan identifies shortages in specialist IT, engineering, technical, construction, management and leadership skills, together with deficiencies in work-readiness and employability skills (page 17). In response, the Plan establishes "Matching Business Demand with Skills Supply" as its primary priority (page 19) and seeks to align training provision with future economic opportunities and employer needs (page 20). Crucially, the Plan proposes the use of planning processes to secure skills outcomes, including a requirement for Skills and Employability Plans to accompany major commercial developments (page 22), providing a direct justification for Policy T12.
- 7.24.4 Policy T12 responds directly to the economic strategy established in the Local Plan and the ELNA (B12). The Plan identifies a requirement for approximately 52.8 hectares of employment land and around 5,850 additional jobs over the plan period (paragraph 1.3.8), whilst the ELNA identifies future demand for industrial and office floorspace and supports growth in sectors including advanced manufacturing, engineering, logistics, innovation and technology (paragraph 1.10; paragraph 5.47; Chapter 7). The Plan's economic strategy seeks to deliver this growth through strategic opportunities including Innovation Park Medway, MedwayOne and the Kingsnorth Expansion Area.
- 7.24.5 In this context, Policy T12 provides a mechanism for aligning learning, skills development, apprenticeships and workforce training with planned economic growth and major development proposals. The policy supports collaboration between employers, education providers and developers to help ensure that local residents can access new employment opportunities and that businesses

have access to an appropriately skilled labour force. It also complements the Plan's wider objectives for economic growth, innovation, productivity and social inclusion.

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?

7.25.1 Policy T12 has been informed through ongoing partnership working with employers, education providers, training organisations and wider stakeholders, notably through the Medway Skills and Employability Board and the preparation of the Skills and Employability Plan for Medway 2035. The Plan was developed in a wider strategic framework that aligns with the Local Plan (at examination), the Kent and Medway Workforce Evidence Skills Base, and the South East LEP Skills Strategy (page 6). Stakeholder workshops with education providers and businesses were held during the Regulation 18 consultation in the preparation of the Plan.

7.25.2 The Plan is founded on collaboration between businesses, universities, colleges, schools, training providers and the Council, with the objective of creating a pipeline of work-ready talent and ensuring that skills provision responds to the needs of employers and the local economy (page 4).

7.25.3 Direct engagement with local businesses formed a key part of the evidence base. The "Local Business Voice" section records employer feedback identifying shortages in higher-level and specialist IT skills, engineering and technical occupations, construction skills, management and leadership capability, and wider employability and work-readiness skills. Employers also highlighted the need for stronger links with further and higher education providers and improved access to training and graduate talent (page 17).

7.25.4 The collaborative approach continues through annual business consultations, skills summits, provider engagement and stakeholder boards comprising businesses, education providers and training organisations (pages 22-23). This ongoing engagement ensures that workforce requirements continue to inform skills provision and provides a clear justification for Policy T12.

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?

7.26.1 Policy T12 will be implemented through the development management process, planning obligations and the monitoring framework established by both the Local Plan and the Skills and Employability Plan for Medway 2035. The Skills Plan identifies "Matching Business Demand with Skills Supply" as its principal priority

(page 19) and includes actions to require a Skills and Employability Plan for major commercial development proposals, together with monitoring of training and skills contributions secured through procurement and development processes (page 22).

7.26.2 This provides a clear mechanism for securing apprenticeships, work placements, local labour agreements, training programmes and employer engagement initiatives as part of major developments and strategic growth locations. Delivery can then be measured against the Skills Plan's success indicators, including opportunities generated through section 106 skills contributions and procurement obligations (D1), apprenticeship starts and employer levy utilisation (D2-D3), employer and education-provider engagement leading to new training provision (M1-M2), and improved employment outcomes for local residents (E1-E3 and T1-T2) (page 21).

7.26.3 In addition, implementation and outcomes will be monitored through the Local Plan Monitoring Framework (A14) and reported annually through the Authority Monitoring Reports (as per A15.1 and A15.2). These provide wider monitoring of economic development performance, including employment land delivery, job growth and the implementation of economic policies, enabling the Council to assess whether strategic growth locations are delivering the economic and workforce outcomes anticipated by the Plan.

7.26.4 The Skills and Employability Plan is itself subject to ongoing review by the Skills Boards and annual Skills Summit (page 23), ensuring that future workforce requirements continue to inform policy implementation and that development contributes towards addressing identified skills shortages in Medway's priority sectors.

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?

7.27.1 Policy T12 plays an important supporting role in delivering the Economic Strategy by ensuring that workforce skills develop alongside the employment growth anticipated by the Local Plan. The Plan's economic strategy seeks to deliver approximately 5,850 jobs and 52.8 hectares of employment land through a combination of employment land retention, modernisation and new strategic allocations (Local Plan paragraph 1.3.8; paragraphs 7.4.3-7.4.4). The ELNA (B12) identifies future growth in sectors including advanced manufacturing, engineering, logistics, innovation and technology and concludes that workforce

skills and productivity will be important factors in supporting economic performance (paragraph 1.10, paragraph 5.47 and Chapter 7).

7.27.2 The relationship between skills and economic growth has been assessed through the Skills and Employability Plan for Medway 2035 which identifies workforce skills as a key component of delivering Medway's growth ambitions. The Plan notes that Medway is expected to accommodate around 17,000 additional jobs by 2035 and states that this will require an "excellent skills base" aligned with employer demand (pages 2 and 4). It identifies skills shortages in priority sectors including advanced manufacturing and engineering, construction, IT and digital, health and social care and creative industries (page 12), together with employer concerns regarding shortages of technical, engineering, digital, construction and leadership skills (page 17).

7.27.3 This evidence aligns with the Local Plan's broader objectives to improve skills, productivity, innovation and economic competitiveness (Local Plan paragraphs 3.1.6 and 3.1.8). Policy T12 therefore provides a mechanism for addressing identified labour market constraints through apprenticeships, training, workforce development and employer engagement. Whilst delivery of the Economic Strategy does not depend solely on Policy T12, the evidence demonstrates that successful economic growth is partly dependent upon addressing skills shortages and improving labour supply. This relationship was recognised through the preparation of the Skills and Employability Plan, the ELNA and the Sustainability Appraisal (A3.2), which support a strategy that integrates employment growth with workforce development (paragraphs 7.4.3-7.4.4; B12 paragraph 5.47).

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?

7.28.1 The effectiveness of Policy T12 will be monitored through a combination of the Local Plan Monitoring Framework (A14), annual Authority Monitoring Reports (as per A15.1 and A15.2), and the implementation framework of the Skills and Employability Plan for Medway 2035. Together, these provide mechanisms for assessing whether skills development and workforce outcomes are supporting the delivery of the Plan's wider economic objectives.

7.28.2 The Skills and Employability Plan establishes a range of measurable indicators, including opportunities secured through skills contributions and procurement obligations, apprenticeship starts and employer utilisation of apprenticeship funding, business engagement with education providers, the creation of new training opportunities, and improvements in employment outcomes for local residents (page 21). The Skills and Employability Plan also requires ongoing

monitoring through stakeholder boards, employer engagement, annual business consultations and Skills Summits (pages 22-23). These indicators enable the Council to assess whether workforce development is responding to identified skills shortages and employer requirements.

7.28.3 At the Local Plan level, monitoring of employment land delivery, job growth, implementation of economic policies and development commitments will be reported through the Authority Monitoring Reports and Monitoring Framework (A14, A15.1 and A15.2). Where major developments include Employment and Skills Plans, apprenticeships, local labour agreements or other workforce initiatives secured through planning obligations, delivery can be monitored through planning approvals and associated obligations.

7.28.4 Should monitoring identify under-delivery, the Council can review the implementation of Policy T12 through the development management process, strengthen requirements in planning obligations and supplementary guidance, and use future reviews of both the Local Plan and the Skills and Employability Plan to ensure that skills provision, training opportunities and workforce development remain aligned with Medway's economic growth objectives.

7.29 [Are there specific targets, commitments or partnerships which provide confidence that the policy's objectives can realistically be achieved?](#)

7.29.1 Yes. Confidence in the delivery of Policy T12 is strengthened by the fact that it is not a standalone policy but forms part of a wider framework of evidence, partnerships and delivery mechanisms established through the Skills and Employability Plan for Medway 2035, the Kent and Medway Local Skills Improvement Plan (LSIP) and the Local Plan's economic evidence base.

7.29.2 The Skills and Employability Plan was prepared through collaboration between Medway Council, employers, universities, colleges, training providers and other skills stakeholders. It establishes a shared vision for addressing workforce needs and identifies specific priority sectors, including advanced manufacturing and engineering, construction, IT and digital, health and social care, and creative and cultural industries (page 12). The evidence underpinning the Plan includes direct engagement with employers, which identified skills shortages and recruitment challenges in many of the sectors expected to drive future economic growth (page 17).

7.29.3 The Plan also contains a series of measurable commitments and success indicators. These include increasing opportunities secured through skills contributions and procurement obligations, supporting apprenticeship growth, strengthening employer engagement with education providers, developing new training pathways and improving employment outcomes for local residents (page

21). Delivery is supported through the Medway Skills and Employability Board, annual Skills Summits, employer engagement programmes and ongoing collaboration with education and training providers (pages 22-23).

7.29.4 These arrangements align closely with the Local Plan's Economic Strategy and the Employment Land Needs Assessment (B12), which identify significant employment growth and demand in higher-value sectors. Policy T12 therefore builds on an established evidence base, recognised partnership structures and clear delivery mechanisms, providing confidence that workforce development can support the employment growth anticipated by the Plan. The policy's effectiveness can then be monitored through the Skills and Employability Plan, the Local Plan Monitoring Framework (A14) and the Authority Monitoring Reports (A15.1 and A15.2).

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?

7.30.1 Policy T13 is informed by the Local Plan's wider economic evidence base, which identifies tourism, culture, heritage and leisure as important components of Medway's economy and contributors to economic diversification, inward investment and place-making. The Local Plan highlights the role of Medway's historic environment, waterfront assets, cultural attractions and growing visitor economy in supporting regeneration, investment and employment growth. The Plan's spatial strategy seeks to maximise the economic benefits arising from these assets whilst enhancing Medway's attractiveness as a destination for residents, visitors and businesses (paragraphs 3.1.6, 3.1.8 and Chapter 7).

7.30.2 The evidence base demonstrates that tourism and culture are important components of Medway's economy and wider regeneration strategy. Research commissioned by Visit Kent identified 4.5 million visitors to Medway in 2022, generating £312 million of economic value and supporting 5,782 jobs (Local Plan paragraph 7.6.2)¹. The Local Plan further recognises that tourism and culture make a significant contribution to Medway's current and future economic prosperity, support community wellbeing, raise Medway's profile and help attract investment (paragraph 7.6.9).

7.30.3 This approach is supported by the Medway Cultural Strategy, which states that by 2030 Medway will be "internationally recognised for its creativity and culture" and will reposition itself as a cultural hub using its cultural assets to support regeneration and growth (pages 6 and 9). The Strategy explicitly identifies culture

¹ [Kent Cambridge Economic Impact Model - Visit Kent Business](#)

as contributing to social and economic benefits, economic growth, civic pride and place-making, and recognises culture as integral to regeneration and community cohesion (pages 9, 11 and 15).

7.30.4 The Strategy also highlights opportunities arising from Medway's regeneration ambitions, creative economy and visitor offer (page 4), and states that culture should support wider sectors including education, regeneration and economic growth (pages 19-20). It further identifies the need to attract investment into cultural spaces and recognises cultural infrastructure as having social, economic and community value (page 23).

7.30.5 These objectives are reflected in the Local Plan. Policy S14 and supporting text identify culture and creativity as important in attracting people to live in and visit Medway (Local Plan paragraphs 7.7.1-7.7.5), whilst Policy T13 supports tourism, cultural facilities and visitor accommodation as part of Medway's wider strategy for economic growth, regeneration and place-making.

7.30.6 Policy T13 is consistent with national policy by supporting sustainable economic growth, cultural infrastructure, tourism development and visitor accommodation in appropriate locations, consistent with the objectives of NPPF paragraphs 85-86, 90, 98(a)-(b), 203(e) and 210(b). The policy also reflects the NPPF's recognition that arts, culture, tourism, hotels and conference facilities are important main town centre uses that contribute to economic vitality, place-making and the enjoyment of the historic environment.

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?

7.31.1 Policy T13 is justified by evidence demonstrating the significant contribution that tourism and culture already make to Medway's economy, together with identified opportunities for future growth. The Local Plan states that tourism, arts and culture are central to the Council's ambitions for regeneration, economic development and place-making (paragraph 7.6.1).

7.31.2 The Local Plan sets out the strong and diverse tourism offer based on Medway's heritage assets, waterfront environment, cultural facilities, festivals, town centres and countryside attractions (paragraphs 7.6.3-7.6.4). The Plan recognises that tourism and culture contribute not only to economic prosperity but also to community wellbeing, regeneration, investment and Medway's wider profile (paragraph 7.6.9).

7.31.3 Future needs are reflected in the Council's aspiration to strengthen the visitor economy through heritage-led regeneration, improved arts and cultural facilities, waterfront development and an expanded range of visitor accommodation. The

supporting text identifies opportunities for additional hotels, self-catering accommodation, camping, caravanning and marina-based accommodation and notes that Medway's visitor accommodation sector remains smaller than Kent and national averages (paragraph 7.6.5).

7.31.4 This approach is reinforced by the Medway Cultural Strategy, which seeks to reposition Medway as a cultural hub and identifies culture as a driver of economic growth, regeneration, inward investment, community wellbeing and civic pride (pages 6, 9, 15 and 23).

7.32 How does the policy support and complement the Economic Strategy, heritage assets, cultural infrastructure and regeneration objectives?

7.32.1 Policy T13 complements and supports the Local Plan's Economic Strategy by recognising the contribution that tourism, culture and visitor accommodation make to economic growth, regeneration and placemaking. Tourism is already an important sector in Medway's economy, with Visit Kent research identifying 4.5 million visitors in 2022, generating £312 million of economic activity and supporting 5,782 jobs (paragraph 7.6.2). The Local Plan recognises that tourism and culture make a significant contribution to economic prosperity, community wellbeing and investment attractiveness (paragraph 7.6.9).

7.32.2 The policy builds upon Medway's existing strengths, including its heritage assets, waterfront environment, town centres, cultural facilities, festivals and countryside attractions (paragraphs 7.6.3-7.6.4). It supports the regeneration strategy by encouraging heritage-led regeneration, investment in cultural venues and facilities, waterfront development and an enhanced visitor accommodation offer, including hotels, self-catering accommodation and marina-based facilities (paragraph 7.6.5).

7.32.3 Policy T13 also aligns with the objectives of the Medway Cultural Strategy, which seeks to reposition Medway as a cultural hub and identifies culture as a driver of economic growth, regeneration, civic pride and place-making (pages 6, 9 and 15). The Strategy further recognises opportunities for inward investment in cultural spaces and the creative economy, whilst highlighting the role of culture in supporting wider sectors, including regeneration and economic development (pages 20 and 23).

7.33 What evidence demonstrates that there is a quantitative or qualitative need for additional visitor accommodation in Medway, and how has this informed the policy approach?

7.33.1 The evidence for additional visitor accommodation is primarily qualitative rather than a quantified hotel needs assessment. The Local Plan identifies a substantial visitor economy, with 4.5 million visitors generating £312 million and

supporting 5,782 jobs (paragraph 7.6.2).² It further states that growth in tourism creates opportunities to expand visitor accommodation and that Medway's accommodation sector is smaller than Kent, regional and national averages (paragraph 7.6.5). The Medway Cultural Strategy reinforces this approach by seeking to grow Medway's cultural profile, visitor offer and inward investment (pages 6, 9, 21 and 23). The tourism sector across Kent and Medway has been going through significant change, particularly post Covid. The Plan has taken account of work published by Visit Kent, including the Kent Accommodation Study and the Destination Management Plan. The Council is working on a new Destination Management Plan.

7.33.2 Together, these documents provide the justification for a supportive policy approach towards visitor accommodation, rather than a target-based allocation strategy.

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?

7.34.1 Visit Kent research demonstrates a substantial visitor economy, with 4.5 million visitors, £312 million of economic value and 5,782 jobs supported in 2022, providing a strong market basis for tourism investment and visitor accommodation growth (paragraph 7.6.2). The Local Plan identifies opportunities to strengthen tourism through heritage-led regeneration, enhanced cultural facilities, waterfront development and an expanded visitor accommodation offer, whilst noting that Medway's accommodation sector is smaller than Kent, regional and national averages (paragraph 7.6.5).

7.34.2 Delivery is supported by the Council's wider regeneration programme, including town centre and waterfront regeneration, public realm investment, the Chatham Design Code and the Star Hill to Sun Pier framework, and work promoting green tourism on the Hoo Peninsula and the Council's support for the East Coast Flyway Unesco World Heritage bid. All of which seek to improve Medway's attractiveness to visitors and investors (paragraphs 7.6.5-7.6.6).

7.34.3 The Medway Cultural Strategy reinforces this approach by seeking to reposition Medway as a cultural hub, support cultural infrastructure, attract inward investment and strengthen Medway's profile as a destination for visitors, residents and businesses (pages 6, 9 and 23). Together, these initiatives provide a long-term framework to support tourism growth, regeneration and investment in visitor facilities.

² [Kent Cambridge Economic Impact Model - Visit Kent Business](#)

7.34.4 Progress can be monitored through the Local Plan Monitoring Framework (A14), Authority Monitoring Reports (as per A15.1 and A15.2) and the ongoing implementation of cultural and regeneration strategies, enabling the Council to review delivery and respond to changing market conditions where necessary.

7.35 Are the locations where visitor accommodation is encouraged consistent with the spatial strategy, accessibility objectives and heritage considerations of the Plan?

7.35.1 Yes. Policy T13 is closely aligned with the Plan's spatial strategy, accessibility objectives and heritage policies.

7.35.2 The policy directs tourism, cultural facilities and visitor accommodation towards locations that support regeneration, town centre vitality and sustainable travel. The supporting text highlights opportunities associated with mixed-use development, urban regeneration and waterfront regeneration, whilst Policy T13 supports visitor accommodation where it contributes to the vitality and viability of town centres and local communities (paragraphs 7.6.5 and Policy T13).

7.35.3 The policy is also consistent with the Plan's accessibility objectives. Policy T13 requires tourism and visitor accommodation proposals to maximise opportunities for sustainable travel in accessible locations and minimise traffic generation. Proposals are expected to be located where visitors can access services, attractions and public transport without undue reliance on private cars. (Policy T13, page 117-118).

7.35.4 Heritage considerations are integral to the policy approach. The Local Plan identifies Medway's heritage assets, including the Historic Dockyard Chatham, Rochester and Upnor Castles, Rochester Cathedral and wider historic townscapes, as key components of its tourism offer (paragraph 7.6.3). Policy T13 supports tourism growth and visitor accommodation only where proposals respect the character of the built, historic and natural environment and preserve the integrity of heritage assets and their settings (Policy T13; paragraphs 7.6.3, 7.6.13).

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?

7.36.1 The tourism growth envisaged by Policy T13 is supported by a combination of existing visitor attractions, planned regeneration initiatives and supporting infrastructure investment. The Local Plan identifies a substantial tourism offer based on heritage assets, cultural facilities, waterfront locations, town centres and countryside attractions (paragraphs 7.6.3-7.6.4), whilst Visit Kent research

demonstrates an established visitor economy generating £312 million and supporting 5,782 jobs (paragraph 7.6.2).

7.36.2 The Infrastructure Delivery Plan (B2) identifies the transport, public realm, community and regeneration infrastructure required to support growth across Medway, whilst the Council's regeneration programme includes the Chatham Design Code and Star Hill to Sun Pier framework, both of which are intended to enhance tourism, vitality and place quality (paragraph 7.6.6). The Medway Cultural Strategy further identifies a strong cultural infrastructure and long-term delivery framework through the Creative Medway Compact (pages 29-36). Together, these documents demonstrate that the infrastructure, cultural assets and partnership arrangements needed to support tourism growth are already in place or planned for delivery during the Plan period.

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?

7.37.1 The effectiveness of Policy T13 will be monitored through the Local Plan Monitoring Framework (A14) and reported annually through the Authority Monitoring Reports (as per A15.1 and A15.2), alongside wider monitoring of economic development, regeneration and town centre performance. These mechanisms enable the Council to assess whether tourism, cultural facilities and visitor accommodation are coming forward as anticipated and whether they are contributing to the Plan's wider economic and regeneration objectives.

7.37.2 The evidence base also provides a benchmark against which future performance can be assessed. Visit Kent research identified 4.5 million visitors, £312 million of economic value and 5,782 tourism-supported jobs in 2022 (Local Plan paragraph 7.6.2), whilst the Local Plan recognises the need to expand and diversify the visitor accommodation offer (paragraph 7.6.5).

7.37.3 Delivery is further supported through the Council's wider regeneration programme and the Medway Cultural Strategy, which includes ongoing review and evaluation through the Creative Medway Compact, Action Plans and annual reviews (pages 35-36).

7.37.4 Should monitoring indicate that tourism growth or visitor accommodation delivery is below expectations, the Council can review policy implementation through development management decisions, continue to support regeneration and cultural investment initiatives, and consider future updates to the Local Plan, Cultural Strategy and associated delivery programmes to respond to changing market conditions.

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?

7.38.1 Visit Kent³ evidence demonstrates that culture and creative industries are an established and growing component of Medway's economy and are expected to play an increasingly important role in future regeneration and economic growth. The Local Plan identifies tourism, arts and culture as central to the Council's ambitions and wider regeneration strategy (paragraph 7.6.1), whilst the visitor economy supported 4.5 million visitors, generated £312 million of economic value and supported 5,782 jobs in 2022 (paragraph 7.6.2). The Plan also recognises that arts, entertainment and recreation activities are an important part of the local economy and contribute to investment, economic prosperity and Medway's wider profile (paragraph 7.6.9).

7.38.2 The Medway Cultural Strategy provides further justification. It seeks to reposition Medway as a cultural hub and identifies culture as a driver of economic growth, regeneration, community wellbeing and civic pride (pages 6, 9 and 15). The Strategy highlights Medway's existing cultural infrastructure, including museums, galleries, theatres, festivals, creative businesses, universities and creative workspaces, and identifies cultural and creative industries as one of Medway's key economic sectors (pages 29-30).

7.38.3 This evidence has directly informed Policy S14, which supports the retention, enhancement and expansion of cultural infrastructure, creative industries and cultural facilities. The policy recognises the role that culture and creativity play in attracting residents and visitors, supporting regeneration, strengthening the local economy and contributing to place-making and town centre vitality (Local Plan paragraphs 7.7.1-7.7.5 and Policy S14).

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?

7.39.1 Policy S14 forms an important part of the Plan's wider economic and regeneration strategy by recognising culture and creative industries as drivers of economic growth, investment, tourism, place-making and community wellbeing. The supporting text identifies the Cultural Strategy's ambition to reposition Medway as a cultural hub and notes that culture and creativity have a key role in attracting people to live in and visit Medway, whilst supporting jobs, skills and investment. (Local Plan paragraphs 7.7.1-7.7.5).

³ [Kent Cambridge Economic Impact Model - Visit Kent Business](#)

7.39.2 The policy complements the Economic Strategy by supporting the growth of cultural infrastructure, creative industries and cultural attractions, helping to diversify the local economy and strengthen Medway's attractiveness as a place to live, work, invest and visit. The Medway Cultural Strategy identifies culture as a contributor to economic growth, regeneration and civic pride, and recognises cultural and creative industries as one of Medway's key economic sectors. (Cultural Strategy pages 9, 15, 24 and 29).

7.39.3 Policy S14 also directly supports Policy T13 and the visitor economy. The Local Plan identifies tourism, arts and culture as central to Medway's ambitions, with tourism generating £312 million of economic value and supporting 5,782 jobs in 2022 (paragraphs 7.6.1-7.6.2). Cultural facilities, festivals, heritage assets and creative activities are key components of Medway's tourism offer and help attract visitors and investment.

7.39.4 The policy further reinforces regeneration and town centre objectives by supporting cultural uses, creative workspaces, festivals and events that contribute to the vibrancy and vitality of centres such as Chatham and Rochester. The Medway Cultural Strategy highlights the role of culture in place-making, town centre activity, the night-time economy and the reuse of spaces, whilst the Local Plan links cultural investment to regeneration initiatives, including Chatham town centre and waterfront renewal (paragraph 8.7.3; Cultural Strategy pages 21 and 23).

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?

7.40.1 The evidence for Policy S14 is largely qualitative rather than based on a quantified floorspace requirement. The Medway Cultural Strategy identifies an extensive existing cultural infrastructure comprising museums, galleries, theatres, festivals, creative businesses, universities, studios and cultural venues, and recognises cultural and creative industries as an established part of Medway's economy (pages 29-30). It also promotes the protection and development of creative spaces and identifies opportunities for new cultural facilities, workspaces and investment in cultural infrastructure (pages 23-25).

7.40.2 The Medway Cultural Strategy acknowledges that parts of the creative sector lack affordable workspace and that cultural infrastructure requires continued support and coordination (pages 23 and 31), but establishes a delivery framework through the Creative Medway Compact, Theme Working Groups and Action Plans to identify needs and bring forward future provision (pages 34-36). The Chatham Creative Quarters programme identifies four locations of focus as part of a Future Cities Framework to support the development of this sector as

part of the wider Thames Estuary Production Corridor. The ambitions include the provision of workspace and venues.

7.40.3 This evidence informs the Policy S14 flexible approach, which supports the retention, enhancement and expansion of cultural infrastructure and creative industry spaces rather than allocating specific sites. The policy is therefore intended to ensure that existing assets are protected whilst allowing additional cultural and creative industry provision to come forward in response to changing needs and opportunities throughout the Plan period (Local Plan paragraphs 7.7.1-7.7.5 and Policy S14).

7.41 How will Policy S14 protect, support and expand cultural and creative uses whilst balancing competing pressures for housing, commercial development and regeneration?

7.41.1 Policy S14 takes a positive and flexible approach by supporting the retention, enhancement and expansion of cultural infrastructure, creative industries and cultural facilities, whilst integrating these uses in Medway's wider regeneration and growth strategy. The policy recognises that culture and creativity are important economic assets that contribute to tourism, investment, town centre vitality and place-making, rather than viewing them as competing land uses. (Local Plan paragraphs 7.7.1-7.7.5)

7.41.2 The supporting evidence acknowledges that cultural and creative spaces can be vulnerable to increasing land values and redevelopment pressures associated with regeneration. The Medway Cultural Strategy specifically identifies the need to protect and develop creative spaces, recognising their social, economic and community value, and highlights the importance of providing affordable and accessible workspace for the creative sector (page 23). It also seeks to secure new cultural facilities and creative workspaces through long-term planning and partnership working (pages 23-25).

7.41.3 Rather than preventing regeneration, Policy S14 seeks to ensure that cultural and creative uses form part of it. The policy supports the incorporation of cultural facilities, creative workspaces, festivals, events and creative industries in town centres, regeneration areas and mixed-use developments, helping to strengthen local character, support the evening economy and enhance the attractiveness of places to live, work and visit (Local Plan paragraphs 7.7.4-7.7.5; Cultural Strategy pages 21 and 23).

7.41.4 There are specific opportunities to realise ambitions for housing, employment and expanding creative and cultural uses in the Chatham Intra area, which is covered by the Star Hill to Sun Pier Conservation Area Management Plan. More widely the Chatham Creative Quarters programme is being developed in

partnership with businesses, communities and educational institutions to support growth in the cultural sector. Many of the opportunities are seen to be directly related to development allocations and locations in the Plan, such as the regeneration in Chatham Town Centre and at Chatham Maritime.

7.42 How has engagement with cultural organisations, creative businesses, educational institutions and regeneration partners informed the policy?

7.42.1 Policy S14 has been informed by extensive engagement undertaken through the preparation of the Medway Cultural Strategy, which involved cultural organisations, creative practitioners, educational institutions, regeneration partners, businesses, community groups and public sector stakeholders. The Medway Cultural Strategy identifies culture and creativity as key components of Medway's economic, social and regeneration ambitions and was developed through a collaborative process designed to establish a shared vision and delivery framework.

7.42.2 The consultation process included engagement with around 70 stakeholders from the cultural, education, regeneration, economic development, health and community sectors, together with more than 150 participants at an Open Space event and a series of themed workshops and stakeholder discussions. The Medway Cultural Strategy also involved the Medway Cultural Partnership, Arts Council England, local businesses, tourism organisations, education providers and representatives from the visitor economy (pages 11-13).

7.42.3 This engagement identified a number of key issues which are reflected in Policy S14, including the need to strengthen cultural infrastructure, improve collaboration across sectors, support creative workspaces, attract investment, enhance cultural participation and better integrate culture with regeneration and economic development objectives (pages 11-13, 19-23).

7.42.4 The Strategy further highlights the contribution of universities, colleges, cultural venues, festivals, creative businesses and cultural partnerships to Medway's economy and identifies culture and creative industries as a key sector for future growth (pages 29-30).

7.42.5 These findings of the Medway Cultural Strategy informed the Policy S14 approach of supporting the retention, enhancement and expansion of cultural facilities, creative industries and creative workspaces as part of the wider strategy for economic development, tourism, regeneration and place-making (Local Plan paragraphs 7.7.1-7.7.5).

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?

7.43.1 Policy S14 and supporting text state that culture and creativity play an important role in attracting people to live in and visit Medway and support the continued growth and evolution of Medway's cultural infrastructure and creative industries (paragraphs 7.7.1-7.7.5). The Plan also identifies tourism, arts and culture as central to the Council's wider ambitions for economic development and regeneration (paragraph 7.6.1), with tourism already generating £312 million of economic value and supporting 5,782 jobs (paragraph 7.6.2).

7.43.2 The is underpinned by the fact that the culture and creative industries sector is expected to play a significant role in delivering Medway's economic growth, tourism offer and place-making objectives. The Medway Cultural Strategy identifies cultural and creative industries as one of Medway's key economic sectors and highlights the area's existing strengths in museums, galleries, theatres, festivals, creative businesses, universities and cultural venues. The Strategy seeks to reposition Medway as a nationally recognised cultural hub, strengthen the creative economy and support wider economic growth, regeneration and inward investment. Pages 29-30 identify cultural and creative industries as a key sector in Medway's growing and diverse economy.

7.43.3 The Strategy also emphasises that culture can encourage economic growth, raise Medway's profile, attract investment and enhance civic pride and community wellbeing (pages 9 and 15). It identifies opportunities to support the visitor economy through cultural attractions, events, heritage assets and creative activity, whilst recognising the role of culture in regeneration, place-making and the night-time economy (pages 21 and 23). See also our response to Question 7.41.4.

7.44 Are there specific locations, clusters or regeneration areas where the Council expects the sector to grow, and what evidence supports this approach?

7.44.1 Yes. Whilst Policy S14 does not allocate specific sites for cultural and creative industries, the evidence identifies several locations where growth is expected to be concentrated. Again, please refer to our response to Question 7.41.4 and the specific locations in the Chatham Creative Quarters programme. This includes opportunities in the development of employment land at Chatham Docks, with links to the nearby Universities.

7.44.2 The Local Plan highlights Chatham and Rochester as key cultural and creative hubs, reflecting the concentration of cultural facilities, heritage assets, festivals, events, visitor attractions and town centre activities in these locations. Supporting text to Policy S14 notes that larger centres such as Rochester and Chatham already contain significant cultural activity and infrastructure, and identifies opportunities to broaden and strengthen this offer over the plan period.

7.44.3 The Local Plan also points to growth being associated with town centre regeneration and waterfront renewal. The Plan references the Chatham Design Code and Star Hill to Sun Pier Development Framework as initiatives intended to support vibrancy, tourism, community activity and cultural investment (paragraph 7.6.6). The Chatham town centre strategy further highlights opportunities to support culture, creativity, festivals, heritage and the evening economy as part of regeneration (paragraph 8.7.3).

7.44.4 The Medway Cultural Strategy supports this approach. It seeks to reposition Medway as a cultural hub (page 6), identifies the importance of creative spaces, cultural venues and town centre locations (pages 23 and 30), and promotes the development of cultural infrastructure, creative workspaces and "Beacon Spaces" capable of attracting investment and cultural activity (page 23). The Strategy also identifies existing clusters of universities, museums, galleries, theatres, festivals and creative businesses as foundations for future growth (pages 29-30).

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?

7.45.1 Policy S14 will be delivered through the development management process and the Council's wider cultural, regeneration and economic development programmes. The policy provides support for the retention, enhancement and expansion of cultural facilities, creative workspaces and creative industries, enabling these uses to come forward through regeneration schemes, town centre investment and individual development proposals. The designation of Medway as a Priority Heritage Place brings investment into this sector. The Medway Cultural Strategy establishes a long-term delivery framework through the Creative Medway Compact, Theme Working Groups and a programme of Action Plans (pages 34-35). Delivery is supported by partnership working involving cultural organisations, creative businesses, educational institutions, regeneration bodies and other stakeholders, as reflected in the Strategy's partnership framework (page 30). The Creative Medway Compact is responsible for coordinating delivery and monitoring progress, whilst Action Plans, annual reviews and evaluation processes ensure that emerging needs and opportunities can be identified and responded to throughout the Plan period (pages 35-36).

7.45.2 Monitoring will take place through the Local Plan Monitoring Framework (A14) and annual Authority Monitoring Reports (as per A15.1 and A15.2), alongside the Medway Cultural Strategy's review and evaluation processes. The Cultural Strategy also includes annual review mechanisms, Action Plans and

performance monitoring overseen by the Creative Medway Compact (pages 35-36).

- 7.45.3 The Council can assess progress through indicators such as the provision and retention of cultural facilities and creative workspaces, delivery of cultural projects and regeneration initiatives, cultural participation, visitor economy performance and business growth in the creative sector. If monitoring identifies under-delivery, the Council can review policy implementation, update Action Plans and supporting strategies, strengthen partnership initiatives and consider changes through future reviews of the Local Plan and Medway Cultural Strategy.

Policy T14: Rural Economy

7.46 How does the Plan, and Policy T14 specifically, support rural economic activity?

- 7.46.1 Policy T14 supports rural economic activity by providing a positive framework for the growth, diversification and resilience of the rural economy whilst recognising the environmental and landscape sensitivities of Medway's countryside. The supporting text identifies agriculture, food production, rural businesses, tourism, recreation and environmental land management as important components of the rural economy and recognises the contribution that these sectors make to local employment, investment and community sustainability.
- 7.46.2 The policy supports the expansion and diversification of rural businesses, including agriculture, agri-food activities, tourism, leisure, recreation and other appropriate forms of rural enterprise. It also encourages the sustainable reuse of existing rural buildings and supports proposals that help maintain the economic vitality of rural communities. This reflects the Plan's wider objective of supporting economic growth across all parts of Medway rather than focusing solely on urban locations.
- 7.46.3 The evidence base recognises the importance of rural tourism, particularly on the Hoo Peninsula, in the estuary environment and around the Kent Downs National Landscape, where opportunities exist for walking, cycling, birdwatching and water-based recreation (paragraph 7.6.4). The Local Plan also notes opportunities to strengthen the rural economy through sustainable tourism initiatives and environmental enhancement projects.
- 7.46.4 Moreover, Policy T14 is consistent with national policy. The National Planning Policy Framework requires planning policies to support the sustainable growth and expansion of rural businesses, the diversification of agricultural and other land-based enterprises, sustainable rural tourism and the retention of community facilities (NPPF paragraphs 88a-d). The policy's support for agricultural development, business diversification, rural tourism and the reuse of

rural buildings directly reflects these objectives. In doing so, Policy T14 also recognises the environmental and landscape sensitivities of the countryside, consistent with NPPF paragraph 89, which requires rural development to be appropriately located and sensitive to its surroundings.

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 in Medway?

7.47.1 Policy T14 is justified by evidence demonstrating the continuing importance of agriculture, food production, rural businesses and tourism to Medway's rural economy. The supporting text at paragraphs 7.8.1-7.8.9 identifies the role of farming, agri-food businesses, environmental land management and rural enterprise, and recognises the need for these sectors to adapt to changing economic, environmental and market conditions. This assessment is supported by the evidence cited at footnotes 92-99, including labour market data from NOMIS, DEFRA research on the structure of the agricultural industry and changing farming practices, NFU evidence on the regional agri-food sector, and climate change evidence for Kent and Medway. These sources identify the need for diversification, innovation and resilience in the rural economy. The policy is also consistent with NPPF paragraphs 85, 88 and 89, which support sustainable economic growth, the diversification of agricultural and land-based businesses, sustainable rural tourism and the retention of services and facilities that support rural communities. Together, this evidence supports a flexible policy framework that enables rural businesses and enterprises to grow and adapt throughout the Plan period.

7.48 How has the Council assessed the need for new rural employment opportunities, diversification schemes and business growth in rural areas, and how have those findings informed the policy?

7.48.1 The Council's assessment is set out in the supporting text to Policy T14 and draws on a range of national, regional and local evidence relating to agriculture, rural businesses, labour markets and environmental change. Local Plan paragraphs 7.8.1-7.8.9 recognise that rural businesses are facing significant changes arising from agricultural reform, climate change, technological innovation and evolving market conditions, creating a need for diversification and new sources of income. The supporting evidence cited in footnotes 92-99 includes NOMIS labour market data, DEFRA research on the structure of the agricultural industry and changing farming practices, NFU research on the agri-food sector, and climate change evidence for Kent and Medway. Together, these sources identify the need for greater business resilience, innovation and diversification in the rural economy.

7.48.2 The Local Plan also identifies opportunities arising from rural tourism, recreation and environmental land management. It highlights the potential for sustainable tourism associated with the Hoo Peninsula, estuaries, countryside and nationally important landscapes, supporting activities such as walking, cycling, birdwatching and water-based recreation (paragraph 7.6.4).

7.48.3 The Council's assessment is also informed by the Employment Land Needs Assessment (B12), which recognises the importance of maintaining a diverse and adaptable economic base capable of responding to changing market demands and supporting a range of business sectors (paragraph 5.47 and Chapter 7). Whilst primarily concerned with employment land requirements, the ELNA reinforces the need for flexibility in supporting economic growth and business development across Medway, including opportunities for rural enterprise, diversification and innovation alongside the more specific evidence on agriculture and rural businesses contained in Local Plan paragraphs 7.8.1-7.8.9.

7.48.4 These findings have informed Policy T14 by supporting a flexible approach to rural economic development. The policy supports the growth and diversification of agricultural and land-based businesses, the sustainable reuse of rural buildings, rural tourism initiatives and other forms of rural enterprise, helping businesses adapt to changing economic circumstances whilst supporting the long-term vitality of Medway's rural communities. The approach is also consistent with the Framework at paragraphs 85, 88 and 89, which support rural business growth, agricultural diversification and sustainable rural tourism.

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?

7.49.1 Policy T14 supports rural economic growth whilst ensuring that development remains consistent with the environmental and landscape objectives of the Local Plan. The supporting text recognises the importance of agriculture, rural enterprise, tourism and diversification to the rural economy, but also acknowledges the sensitive environmental context of much of Medway's countryside, including nationally and internationally designated habitats, heritage assets, landscapes and Green Belt land. The policy therefore supports rural business growth only where proposals are appropriate to their rural location and do not cause unacceptable harm to environmental or heritage interests.

7.49.2 This balanced approach is reflected throughout the Plan. The rural economy section (paragraphs 7.8.1-7.8.9) promotes diversification, innovation and resilience in farming and rural businesses, whilst requiring development to respect the character of the countryside and wider environmental assets.

Similarly, opportunities for rural tourism identified in the Hoo Peninsula, estuary environments and countryside areas are expressly linked to safeguarding the natural environment and its special features (paragraph 7.6.4).

7.49.3 The Sustainability Appraisal (A3.2) considered Policy T14 against the Plan's sustainability objectives and concluded that it would have minor positive effects on the economy and accessibility, whilst having no significant adverse effects on biodiversity, landscape, heritage, natural resources or other environmental objectives (Table 6.2, page 50). The SA also notes that Policy T14 supports rural employment development only where significant loss of high-grade agricultural land is avoided and lower-grade alternatives are not available (Table 14.1, page 113). This demonstrates that the policy seeks to support rural economic growth whilst maintaining appropriate safeguards for environmental assets and the countryside.

7.49.4 Finally, Policy T14 operates alongside the Plan's wider policies on landscape, biodiversity, heritage and Green Belt protection, ensuring that economic development proposals are assessed against these requirements where relevant. The approach is consistent with national policy, particularly NPPF paragraphs 88 and 89, which support the diversification of agricultural and rural businesses and sustainable rural tourism, whilst requiring development to be sensitive to its surroundings and avoid unacceptable environmental impacts. NPPF paragraph 187 also requires planning policies to recognise the intrinsic character and beauty of the countryside and the wider benefits of agricultural land.

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?

7.50.1 The evidence indicates that Policy T14 is deliverable because it supports forms of development that are already established in Medway's rural economy and which respond to recognised economic, agricultural and environmental trends. The supporting text at Local Plan paragraphs 7.8.1-7.8.9 identifies opportunities for agricultural diversification, rural enterprise, environmental land management, tourism and the reuse of rural buildings as realistic and appropriate means of supporting economic activity in rural areas. This assessment is informed by evidence cited in footnotes 92-99, including NOMIS labour market data, DEFRA research on agricultural change, NFU evidence on the agri-food sector and climate change evidence for Kent and Medway. These sources highlight the need for farming and land-based businesses to diversify and adapt to changing market conditions.

7.50.2 The policy is also supported by the Employment Land Needs Assessment (B12), which identifies the need for a diverse, resilient and adaptable economy capable of responding to changing market demands and supporting a range of business sectors (paragraph 5.47 and Chapter 7). Whilst the ELNA does not identify a specific quantitative requirement for rural employment land, it emphasises the importance of maintaining flexibility in the economy and supporting opportunities for business growth and innovation.

7.50.3 The Sustainability Appraisal (A3.2) further concludes that Policy T14 would result in minor positive effects for the economy and accessibility, whilst avoiding significant adverse environmental impacts (Table 6.2, page 50). It also highlights safeguards to protect high-quality agricultural land when supporting rural employment development (Table 14.1, page 113).

7.50.4 Taken together, this evidence demonstrates that the rural diversification, tourism, agricultural and enterprise opportunities supported by Policy T14 are realistic, market-responsive and capable of contributing to the Plan's wider objectives of economic resilience, business growth and sustainable economic development across Medway.

7.51 What role is the rural economy expected to play in the wider Economic Strategy, and what evidence supports that contribution?

7.51.1 The rural economy is expected to make an important contribution to the wider Economic Strategy by supporting economic diversification, business resilience, employment opportunities and sustainable growth across Medway's rural area. The supporting text to Policy T14 (paragraphs 7.8.1-7.8.9) recognises the role of agriculture, agri-food businesses, rural enterprises, environmental land management and tourism in supporting rural communities and the local economy. This assessment is informed by evidence referenced in footnotes 92-99, including DEFRA, NFU, climate change and labour market evidence, which identify the need for farming and rural businesses to adapt, diversify and innovate in response to changing economic and environmental conditions.

7.51.2 The contribution of the rural economy is also supported by opportunities for sustainable tourism and recreation, particularly in Medway's countryside, estuary environments and the Hoo Peninsula (paragraph 7.6.4). The ELNA (B12) further supports the need for a diverse and adaptable economy capable of responding to changing market demands and supporting a broad range of business sectors (paragraph 5.47 and Chapter 7).

7.52 How does the policy support farm diversification, rural enterprise and tourism whilst avoiding unacceptable impacts on the countryside and rural communities?

7.52.1 The forms of development supported by Policy T14 are informed by evidence demonstrating the need for rural businesses to diversify and adapt to changing economic, environmental and agricultural conditions. The supporting text at paragraphs 7.8.1-7.8.9 draws on evidence from NOMIS, DEFRA, the NFU and climate change assessments (footnotes 92-99), which identify the need for farm diversification, innovation, environmental land management and new rural income streams to support the long-term viability of rural businesses.

7.52.2 The policy is also supported by evidence of opportunities for sustainable rural tourism and recreation, particularly in Medway's countryside, estuaries and the Hoo Peninsula (paragraph 7.6.4). Furthermore, the Employment Land Needs Assessment (B12) identifies the importance of maintaining a diverse, resilient and adaptable economy capable of responding to changing market conditions and supporting a broad range of business sectors (paragraph 5.47 and Chapter 7).

7.52.3 The Sustainability Appraisal (A3.2) concludes that Policy T14 would have minor positive effects on the economy and accessibility whilst avoiding significant adverse environmental effects (Table 6.2, page 50). The appraisal also highlights safeguards protecting high-quality agricultural land from inappropriate development (Table 14.1, page 113).

7.52.4 It is also relevant to note that Policy T14 does not operate in isolation and proposals must also comply with the wider Local Plan framework that manages environmental, landscape and infrastructure impacts. In particular, development supported by Policy T14 remains subject to policies relating to the countryside, landscape character, biodiversity and green infrastructure, climate change, flood risk, heritage assets, transport and design. These policies ensure that rural diversification and enterprise proposals are assessed on their individual merits and that economic benefits are balanced against environmental and social considerations.

7.52.5 Collectively then, this evidence demonstrates that agricultural diversification, rural enterprise, tourism and the reuse of rural buildings are realistic, deliverable forms of development that can support economic resilience, employment opportunities and sustainable growth across Medway's rural areas.

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?

7.53.1 The evidence suggests that infrastructure constraints are unlikely to undermine delivery of Policy T14 because the policy primarily supports the diversification, adaptation and expansion of existing rural businesses, rather than seeking on the

allocation of major new employment sites or large-scale infrastructure projects. Criteria include reference to “not creating a significant amount of traffic that is inappropriate to the rural road network” and seeking “to encourage the use of sustainable modes where available”. As such this particular policy is designed to work within infrastructure capacity constraints rather than overcome them with new investment. The supporting text (paragraphs 7.8.1-7.8.9) also promotes a flexible approach to rural enterprise, farm diversification, tourism and the reuse of existing rural buildings, which can often be accommodated in existing settlements and established rural business locations.

- 7.53.2 The wider Local Plan is supported by the Infrastructure Delivery Plan (B2), which identifies the transport, utilities, digital communications and community infrastructure required to support growth across Medway. Whilst the IDP does not identify infrastructure requirements specific to Policy T14, it demonstrates that infrastructure provision has been considered as part of the wider growth strategy and will be monitored and delivered alongside development. Equally, while there are no specific infrastructure schemes linked to Policy T14, the criteria related to transport set out in Policy T14 will allow applicants to reference any improvements in rural connectivity that come forward during the plan period. For instance, as much of Medway’s rural area is on the Hoo Peninsula, plans for BRT-style services to Hoo which could ultimately result in improved rural connectivity through connecting and branched services.
- 7.53.3 The Sustainability Appraisal (A3.2) concluded that Policy T14 would have a minor positive effect on accessibility (SA10) and did not identify any significant adverse effects arising from infrastructure limitations (Table 6.2, page 50).
- 7.53.4 Furthermore, Policy T14 operates alongside other Local Plan policies requiring development to be appropriate to its location and to demonstrate that any transport, infrastructure and environmental impacts can be satisfactorily addressed. In this respect, the policy supports rural economic growth whilst ensuring that proposals are considered against infrastructure capacity and accessibility considerations on a case-by-case basis.
- 7.53.5 The evidence does not identify transport or digital connectivity as a fundamental barrier to delivery of Policy T14. Instead, the policy focuses on supporting small-scale, flexible and locally appropriate forms of rural economic development that can be accommodated in the existing rural infrastructure network, supplemented where necessary by the infrastructure improvements identified through the wider Plan and IDP.
- 7.54 Are the policy criteria sufficiently clear and flexible to support innovation and changing business practices in the rural economy over the Plan period to 2041?

- 7.54.1 The supporting text (paragraphs 7.8.1-7.8.9) recognises that agriculture and rural businesses are operating in a changing context, including agricultural reforms, climate change, technological advances, environmental land management initiatives and evolving market conditions. The evidence cited in footnotes 92-99, including DEFRA, NFU and labour market evidence, identifies the need for farming and land-based businesses to adapt, diversify and develop new income streams.
- 7.54.2 Rather than prescribing specific forms of rural development, Policy T14 supports a broad range of activities, including farm diversification, rural enterprise, tourism, environmental land management and the reuse of rural buildings. This flexibility enables the policy to respond to emerging business models, technological innovation and changing economic circumstances over time.
- 7.54.3 The policy is also effective for development management purposes because it establishes a clear framework against which planning applications can be assessed whilst retaining sufficient flexibility to respond to circumstances that may change over the Plan period. Rather than relying on narrowly defined business sectors or development types, the policy focuses on the nature and purpose of development, namely supporting rural enterprise, diversification and economic resilience. This enables decision-makers to consider proposals that may not currently exist or be widely established, whilst ensuring that they contribute positively to the rural economy and remain compatible with the character and function of the countryside. The criteria-based approach therefore provides certainty for applicants and decision-makers whilst avoiding the need for frequent policy updates as business practices, technologies and rural land uses evolve.
- 7.54.4 The policy's flexibility is reinforced by the Sustainability Appraisal (A3.2), which concluded that T14 would deliver minor positive effects for the economy and accessibility whilst maintaining appropriate environmental safeguards (Table 6.2, page 50). The appraisal also notes that rural employment development should avoid the unnecessary loss of high-quality agricultural land (Table 14.1, page 113).
- 7.54.5 Policy T14 is consistent with national policy. The Framework at paragraphs 85 and 86(e) require planning policies to support economic growth, allow businesses to invest, expand and adapt, and be flexible enough to accommodate changing business needs and working practices. Paragraphs 88(a)-(c) specifically support the expansion and diversification of rural businesses, agricultural enterprises and sustainable rural tourism, whilst paragraph 89 recognises that some rural businesses may require locations

beyond existing settlements where development remains sensitive to its surroundings.

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?

- 7.55.1 The effectiveness of Policy T14 will be monitored through the Local Plan Monitoring Framework (A14) and reported through the Council's Authority Monitoring Reports (as per A15.1 and A15.2), which provide the primary mechanism for assessing the delivery of the Plan's economic objectives. These monitoring arrangements enable the Council to review development trends, economic performance and the implementation of rural economy policies over time.
- 7.55.2 The evidence base also establishes baseline information against which future performance can be assessed. Local Plan paragraphs 7.8.1-7.8.9 identify the importance of agriculture, agri-food businesses, rural enterprise, tourism and environmental land management to the rural economy, whilst the supporting evidence referenced in footnotes 92-99 highlights the need for diversification, innovation and business resilience.
- 7.55.3 In addition, the Sustainability Appraisal (A3.2) concludes that Policy T14 is expected to have minor positive effects on the economy and accessibility (Table 6.2, page 50), providing a benchmark against which implementation can be reviewed. The Council can assess whether rural employment opportunities, diversification schemes, tourism initiatives and rural business development are coming forward as anticipated and, if necessary, review policy implementation through future monitoring reports and Local Plan reviews.