Medway Local Plan 2041 Examination

Matter 14 – Delivery and Monitoring

Hearing Statement

Medway Council

Issues

- **Whether the Plan sets out a clear framework for the delivery and monitoring of its policies and proposals.**
- **How will the effectiveness of the Plan and its policies and proposals be measured and assessed?**

Introduction

This Hearing Statement has been prepared in response to the Inspectors' Matters, Issues and Questions for Phase 2 of the Examination of the Medway Local Plan 2041.

The Council's answers are set out under each question raised by the Inspectors. References are given to the submitted Plan, examination documents, evidence base documents and statements of common ground where relevant.

For ease of navigation, this Hearing Statement includes bookmarks and a linked table of contents.

Where the Council considers modifications necessary to improve effectiveness, clarity or consistency with national policy, these are identified in this Hearing Statement.

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Questions

14.1 How will the effectiveness of the Plan's policies, the identified quantum of development, the associated infrastructure requirements and the Plan's spatial development strategy and strategic objectives be effectively monitored, managed and delivered?

Council's response

14.1.1 The Plan will be delivered and monitored through an integrated framework comprising the submitted Local Plan, the Local Plan Monitoring Framework (A14), the annually published Authority Monitoring Report, the Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2), annual Infrastructure Funding Statements, development management monitoring, and topic-specific monitoring arrangements. Together these provide a continuing feedback loop from policy implementation and development outcomes to management action, infrastructure intervention and, where necessary, review of the Plan.

Evidence base

A1, Submission Medway Local Plan 2041, sections 1.3, 2.2, 3.1 and relevant thematic and site-allocation policies.
A14, Medway Local Plan Monitoring Framework, PDF pages 2-19.
A15.1, Medway Authority Monitoring Report 2025, Volume 1, especially pages 6-15, 32-93.
B2, Infrastructure Delivery Plan (December 2025), paragraphs 1.2.3-1.2.7, 1.3.1-1.3.13 and Appendix 1.
MLP/ED35, Matter 14, questions 14.1-14.5.

Explanation

14.1.2 The submitted Plan establishes the spatial strategy, development requirements and policy framework to 2041. Its strategic objectives are not free-standing aspirations: paragraph 2.2.1 explains that they feed into policy wording and the assessment of sites and locations. The monitoring framework then links indicators to individual policies and identifies the target, where applicable, and the source from which the data will be obtained.

14.1.3 The principal reporting mechanism will be the Authority Monitoring Report. The Council already produces that report annually. The 2025 report explains that it provides economic, social and environmental data, assesses progress towards the Council's planning goals and reports detailed development statistics, including housing, employment, infrastructure, transport, minerals, waste and environmental indicators. This established process provides both the baseline and the administrative route for monitoring the submitted Plan following adoption.

14.1.4 Delivery of infrastructure is addressed through Policy S24, the IDP, and the Infrastructure Delivery Schedule. The IDP identifies the infrastructure needed to support

planned growth and records, where known, the location, delivery body, timeframe, cost, funding source and priority. It is expressly a living document. Appendix 1 states that the IDS will be monitored annually through the AMR process, with direct engagement with Council services and delivery partners to verify progress and identify delay. Annual Infrastructure Funding Statements will separately report developer contributions received, allocated, and spent.

14.1.5 Management and delivery will therefore operate at three connected levels. First, individual proposals will be managed through development management, planning conditions, obligations, phasing and the policy requirements applying to each allocation. Secondly, the Council will use its corporate programmes and partnership arrangements with infrastructure providers, statutory agencies, developers and neighbouring authorities to coordinate delivery. Thirdly, annual monitoring will identify variance from the Plan's assumptions and provide evidence for corrective action, revised delivery programming, updated supplementary guidance or a partial or full review where necessary.

14.1.6 The framework is proportionate because it distinguishes between outcomes controlled directly through planning decisions and outcomes requiring partnership delivery. It also allows the Council to update the evidence and delivery schedule without altering development-plan policy outside the statutory plan-making process.

Conclusion

14.1.7 The Council considers that the Plan, read with A14 - the AMR process, and B2 – the IDP, provides a clear and effective framework for monitoring, managing and delivering the spatial strategy, development quantum, infrastructure and strategic objectives.

14.1.8 A focused Main Modification is nevertheless proposed to place the Plan-wide monitoring and review arrangements expressly in the Plan and make the feedback loop more transparent.

Proposed Main/Minor Modification

14.1.9 Insert new supporting text after section 3.1 of the Plan:

> "*The Council will monitor implementation of the Local Plan through the Medway Local Plan Monitoring Framework and report performance annually through the Authority Monitoring Report. Monitoring will assess delivery of the development strategy, site allocations, infrastructure and policy outcomes against identified indicators and targets. The Infrastructure Delivery Plan and Infrastructure Delivery Schedule will be reviewed alongside this process. Where monitoring identifies material under-performance or delay, the Council will work with relevant delivery partners to identify and implement proportionate corrective action and will consider whether an update or partial or full review of the Plan is required*."

Reason for proposed Main/Minor Modification

14.1.10 This change would consolidate existing monitoring and delivery arrangements in the Plan itself, improve transparency and demonstrate the route from monitoring evidence to management, corrective action and review.

14.2 Several policies in the Plan make reference to monitoring, measuring and assessing how effective the policy and the Plan as a whole are. How will the identified performance indicators and targets be regularly monitored, measured and assessed in the submitted Plan?

Council's response

14.2.1 The indicators and targets will be compiled through established Council monitoring systems and external datasets and reported principally on an annual basis through the Authority Monitoring Report. Topic-specific reporting cycles will continue where the relevant evidence is collected less frequently or through a separate statutory or partnership process.

Evidence base

A14, Medway Local Plan Monitoring Framework, PDF page 2 and thematic schedules at PDF pages 2-19.
A15.1, Medway Authority Monitoring Report 2025, Volume 1, paragraphs in the Introduction and thematic monitoring chapters.
B2, Infrastructure Delivery Plan, paragraph 1.2.7 and Appendix 1, PDF page 95.
A1, Submission Medway Local Plan 2041, Policies DM15, DM18, S24, T30-T40 and SA1-SA14, as relevant.

Explanation

14.2.2 A14 is structured by topic and contains four core fields: the indicator, the Local Plan policy or policies to which it relates, the target where one is applicable, and the data source. This creates a direct audit trail between the Plan's policies and reported outcomes. The framework states that the selected indicators are those for which the Council has the highest confidence that data can be collected and compiled annually. It also allows indicators and targets to be refined where new and reliable data become available.

14.2.3 Most data will be drawn from planning application and appeal records, housing and employment land monitoring, Section 106 records, the Infrastructure Funding Statement, the IDP, the Council's specialist services and published datasets maintained by bodies such as the Office for National Statistics, Department for Transport, Environment Agency, Natural England and Historic England. The use of named sources makes the method repeatable and enables year-on-year comparison.

14.2.4 The monitoring arrangements are supplemented by policy-specific mechanisms. Housing allocations will be monitored by permission, commencement and completion; the employment strategy by floorspace and land delivery; transport by traffic, public

transport, active travel and contribution data; infrastructure by the IDP, IDS and Infrastructure Funding Statement; minerals through the annual Local Aggregates Assessment; waste through operator, Council and Environment Agency data; and environmental mitigation through the relevant partnership or statutory monitoring process.

14.2.5 Not every indicator requires an annual numerical target. In some cases the appropriate measure is a policy compliance test, a direction of travel, no net loss, no deterioration or progress against a programme. Those indicators will still be assessed consistently against the stated policy outcome and explained in the AMR. Where data are collected on a longer cycle, such as certain ecological surveys, the latest available result and reporting cycle will be identified.

Conclusion

14.2.6 The Council considers that the combination of A14 and the established annual AMR process provides a regular, transparent and proportionate means of measuring the performance of the Plan and its policies.

Proposed Main Modification

14.2.7 No separate modification is required beyond the Plan-wide supporting-text modification proposed in response to question 14.1. The Council will, however, keep A14 under review as an implementation document and will report any refined indicators transparently through the AMR.

14.3 Are these performance indicators and targets sufficiently precise so as to be effective?

Council's response

14.3.1 Yes, taken as a whole the indicators are sufficiently precise to identify the matter being measured, its relationship to policy, the intended outcome and the source of the data. Where the submitted framework currently uses a directional target or leaves a target blank, effectiveness derives from the policy requirement, the reported baseline and trend, or the separate evidence document against which performance is assessed. A limited number of indicators would benefit from further definition in the first post-adoption AMR, rather than requiring alteration of the development strategy.

Evidence base

A14, Medway Local Plan Monitoring Framework, PDF pages 2-19.
A1, Submission Medway Local Plan 2041, policy requirements and quantified development provisions.
A15.1, Medway Authority Monitoring Report 2025, Volume 1, established baseline data.
B2, Infrastructure Delivery Plan, Appendix 1.

Explanation

14.3.2 A14 contains a substantial range of quantified or otherwise objectively framed measures. Examples include annual dwelling completions and progress of housing allocations; affordable housing percentages; cumulative employment completions against the Employment Land Needs Assessment; changes in road traffic and public transport use; delivery of identified infrastructure; minerals safeguarding and recycled aggregate outputs; and waste capacity and diversion measures.

14.3.3 A target need not always be expressed as a single number to be effective. For policies concerned with safeguarding, environmental protection or behavioural change, 'no loss', 'no deterioration', 'increase', 'reduction' or compliance with a specified policy requirement may be the appropriate measure. Their effectiveness depends on a defined baseline, a consistent method and an explanation of material variance. The AMR is the appropriate place to state those baselines and report the trend.

14.3.4 The Council recognises that precision can be improved for some indicators by recording the unit of measurement, baseline year, reporting frequency and policy response where performance is materially off track. This is principally an implementation refinement. It can be incorporated into the monitoring schedule used for the first post-adoption AMR without changing the Plan's substantive policy requirements.

14.3.5 To avoid false precision, the framework should not set arbitrary thresholds where outcomes depend on external funding, market conditions or data collected by third parties. In those cases, the Council will report the latest position, explain the causes of variance and identify the action being taken.

Conclusion

14.3.6 The Council considers that the submitted indicators and targets are sufficiently precise to provide an effective basis for monitoring. The proposed modification below would, however, strengthen the framework by identifying the minimum information to be recorded for each key indicator.

Proposed Main/Minor Modification

14.3.7 Add to the Monitoring Framework introductory text:

> "*For each key indicator, monitoring will identify the relevant policy or strategic objective, the measure and unit, the baseline where available, the target or intended direction of travel, the data source and reporting frequency. Where performance is materially off track, the Authority Monitoring Report will identify the reason, the responsible delivery body and any proportionate corrective action*."

Reason for proposed Main/Minor Modification

14.3.8 The additional wording would make explicit how directional and qualitative indicators will be applied and would assist consistent reporting over the Plan period.

14.4 Are these indicators and targets easily and clearly measurable so as to appropriately assess the performance of the Plan and its policies?

Council's response

14.4.1 Yes. The principal indicators rely on established planning monitoring systems, named Council services and published external datasets. They are therefore capable of being collected and reproduced. Where an indicator depends on a developing data source or a topic-specific survey, the framework identifies the relevant source and can be updated transparently as part of the AMR process.

Evidence base

A14, Medway Local Plan Monitoring Framework, PDF page 2 and thematic schedules.
A15.1, Medway Authority Monitoring Report 2025, Volume 1, pages 6-94.
B2, Infrastructure Delivery Plan, paragraphs 1.2.5-1.2.7 and Appendix 1.
A1, Submission Medway Local Plan 2041, relevant policy and site-allocation requirements.

Explanation

14.4.2 The Council's existing AMR demonstrates practical capability to assemble and publish data across the principal Local Plan topics. It already reports housing completions and trajectory information, employment floorspace, regeneration progress, development management statistics, environmental performance, health and community indicators, infrastructure and contributions, transport, minerals, waste and energy.

14.4.3 A14 has been deliberately prepared around data that the Council has confidence it can collect. For example, planning permissions, completions and changes of use can be measured through application and land-monitoring records; obligations and expenditure through Section 106 and Infrastructure Funding Statement records; infrastructure through the IDS; minerals through monitoring returns and the Local Aggregates Assessment; and waste through Council, operator and Environment Agency datasets.

14.4.4 Clear measurability also requires consistency. The first post-adoption AMR should therefore state, for key indicators, the reporting period, unit, baseline, source and any methodological change. Where an indicator is revised because a data source is discontinued or improved, the change should be explained so that trend information is not misleading.

14.4.5 Some policy outcomes are best assessed by combining quantitative and qualitative evidence. Infrastructure delivery, for example, cannot be assessed solely by the value of obligations secured. The Council will also report whether the project has progressed, its delivery status, the responsible body, the expected timeframe and any material funding or programme risk. This is consistent with the structure of the IDS.

Conclusion

14.4.6 The Council considers the indicators to be clear and measurable and that they provide an appropriate basis for assessing the Plan's performance. The additional supporting text proposed under questions 14.1 and 14.3 would make the methodology and treatment of variance explicit.

Proposed Main Modification

N/A.

14.5 How regularly will the performance of the submitted Plan and its policies against its strategic objectives be reviewed and what mechanisms will be in place to do this regular review and inform any necessary update to the Plan or its policies?

Council's response

14.5.1 Performance will be reviewed annually through the Authority Monitoring Report, supported by annual monitoring of the Infrastructure Delivery Schedule and Infrastructure Funding Statement and by the reporting cycles applicable to specialist evidence. The Council will use that evidence to determine whether management action, a change to delivery programming, supplementary guidance, or a partial or full review of the Plan is required.

Evidence base

A14, Medway Local Plan Monitoring Framework, PDF page 2 and thematic schedules.
A15.1, Medway Authority Monitoring Report 2025, Volume 1, Introduction.
B2, Infrastructure Delivery Plan, paragraph 1.2.7 and Appendix 1.
A1, Submission Medway Local Plan 2041, section 2.2 and relevant strategic, thematic, development-management and site-allocation policies.

Explanation

14.5.2 The annual AMR will be the principal corporate record of Plan performance. It will bring together the monitoring results, compare them with the policy target or direction of travel, identify emerging trends and explain significant departures from the Plan's anticipated trajectory. The annual process enables issues to be identified early while avoiding conclusions being drawn from short-term fluctuation alone.

14.5.3 The Council will operate a proportionate escalation process. At the first level, officers will investigate the data and confirm whether the variance reflects a methodological issue, timing difference or genuine delivery concern. At the second level, the Council will engage the responsible service, developer, infrastructure provider or other partner and identify practical corrective action. That may include reprogramming, use of planning obligations or conditions, supporting funding bids, updating the IDS, preparing guidance or applying an existing policy contingency. At the

third level, where under-performance is material, persistent and affects the delivery of the strategy, the Council will consider whether a partial or full review is necessary.

14.5.4 Matters capable of prompting escalation include sustained housing delivery below the adopted requirement or trajectory; failure to maintain an appropriate supply of deliverable housing sites; material delay to critical infrastructure which affects planned development; persistent failure of strategic allocations to progress; employment land delivery materially departing from the strategy; failure to secure required habitats mitigation; unmet accommodation needs; or evidence that minerals or waste capacity assumptions are no longer robust. These are not automatic triggers for review in isolation. The Council will assess scale, duration, cause, spatial effect and the availability of corrective action.

14.5.5 The IDP and IDS will be updated as delivery bodies, programmes, costs and funding change. Such updates will inform implementation but will not amend development-plan policy. Any substantive change to the spatial strategy, development requirements or policy approach will be undertaken through the statutory plan-review process.

Conclusion

14.5.6 The Council considers that annual reporting, linked delivery monitoring and a proportionate escalation route provide an effective mechanism for regular review and for deciding whether the Plan or any policy requires updating.

Proposed Main Modification

14.5.7 The Plan-wide supporting text proposed in response to question 14.1, supplemented by the wording proposed under question 14.3, is sufficient. No separate modification is required.

Conclusion

Having regard to: the submitted Local Plan (A1); the submitted Monitoring Framework (A14); the established Authority Monitoring Report process (A15.1 and A15.2); the Infrastructure Delivery Plan and Infrastructure Delivery Schedule (B2); the annual Infrastructure Funding Statement and topic-specific monitoring arrangements; and the responses above, the Council considers that the Plan's approach to Matter 14 is positively prepared, justified, effective and consistent with national policy.

Positively prepared: the monitoring and delivery framework is directed to achieving the Plan's development strategy and strategic objectives, including delivery of homes, employment, infrastructure, environmental mitigation and community outcomes.

Justified: the framework is based on proportionate evidence and established reporting systems. A14 identifies policy-specific indicators, targets where applicable and named data sources; the AMR provides the baseline and annual reporting mechanism; and B2 identifies infrastructure delivery responsibilities, programmes, costs, funding and priorities.

Effective: the framework establishes a practical cycle of monitoring, assessment, management action and review. The focused Main Modification proposed by the Council would make that cycle explicit in the Plan and clarify the minimum information to be reported for key indicators.

Consistent with national policy: the approach supports effective implementation and review of strategic policies, infrastructure delivery and development outcomes, while ensuring that any substantive change to development-plan policy is made through the proper statutory process.

The proposed Main Modification improves clarity and effectiveness but does not alter the Plan's spatial strategy or substantive policy requirements.

References

Reference	Document title
A1	Submission Medway Local Plan 2041 (Regulation 22, December 2025)
A14	Medway Local Plan Monitoring Framework (Regulation 22 Submission, December 2025)
A15.1	Medway Authority Monitoring Report 2025, Volume 1
A15.2	Medway Authority Monitoring Report 2025, Volume 2
B2	Infrastructure Delivery Plan (December 2025)
MLP/ED35	Inspectors' Matters, Issues and Questions - Phase 2 Hearings (1 October 2026)