

Initial Proposed Composite Statement of Common Ground with Strategic Bodies

Proposed Submission Document

Medway Council

Regulation 19
June 2025

Versions

Version	Name	Date
1	Initial Proposed Composite Statement of Common Ground with Strategic Bodies	12 June 2025

Status of the Statement of Common Ground

This is an initial proposed composite SoCG between Medway Council and the following strategic bodies:

- Gravesham Borough Council;
- Maidstone Borough Council;
- Tonbridge & Malling Borough Council;
- Swale Borough Council;
- Kent County Council;
- Environment Agency;
- Natural England;
- Historic England; and
- National Highways.

This version of the SoCG is intended to support the pre-submission draft Medway Local Plan (Regulation 19). A final SoCG will be signed by all strategic bodies prior to the submission of Medway Council's Local Plan.

On behalf of Medway Council

Name	Councillor Vince Maple
Position	Leader of the Council
Strategic matters	All strategic matters
Signature	

On behalf of Gravesham Borough Council

Name	
Position	
Strategic matters	
Signature	

On behalf of Maidstone Borough Council

Name	
Position	
Strategic matters	
Signature	

On behalf of Tonbridge & Malling Borough Council

Name	
Position	
Strategic matters	
Signature	

On behalf of Swale Borough Council

Name	
Position	
Strategic matters	
Signature	

On behalf of Kent County Council

Name	
Position	
Strategic matters	
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On behalf of the Environment Agency

Name	
Position	
Strategic matters	
Signature	

On behalf of Natural England

Name	
Position	
Strategic matters	
Signature	

On behalf of Historic England

Name	
Position	
Strategic matters	
Signature	

On behalf of National Highways

Name	
Position	
Strategic matters	
Signature	

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1 Introduction

1.1 Definition, purpose and structure

- 1.1.1 A statement of common ground (SoCG) is a written record of agreements that have, or have not, been reached on key strategic matters, including the process for reaching agreements.
- 1.1.2 Medway Council ('the Council') anticipates the need to agree a final SoCG with the following strategic bodies:
 - Gravesham Borough Council;
 - Maidstone Borough Council;
 - Tonbridge & Malling Borough Council;
 - Swale Borough Council;
 - Kent County Council;
 - Environment Agency;
 - Natural England;
 - Historic England; and
 - National Highways.
- 1.1.3 This document is an initial proposed composite SoCG with strategic bodies. It will be updated throughout the plan-making process.
- 1.1.4 This SoCG will set out the strategic context, strategic matters, governance arrangements and ongoing cooperation.

1.2 Terminology

- 1.2.1 This SoCG presents all matters as "Under discussion". Strategic matters will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the strategic bodies.
- 1.2.2 The next iteration of this SoCG will present matters as "Agreed", "Under discussion" or "Not agreed".

1.3 Strategic context

- 1.3.1 Medway sits at the mouth of its great river on the north Kent estuarine coast, bordered by the Thames to the north and the Kent Downs to the south. The five historic towns linked by the A2 form a complex urban conurbation, which retains the distinct identities of the individual towns. The urban area is surrounded by a network of villages on the Hoo Peninsula and the Medway Valley, alongside marshes and mudflats, wooded hills, productive farmland and strategic energy and minerals operations built up around the wharves. Much of the countryside and estuary is of international importance for its environmental qualities, including designated Special Protection Areas, Sites of Special Scientific Interest, and the Kent Downs Area of Outstanding Beauty. Land to the west of Medway forms part of the London metropolitan Green Belt.

- 1.3.2 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by four crossings. The severance caused by the river, established commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth.
- 1.3.3 Medway Council is the local planning, transport, minerals and waste authority for the unitary authority area.
- 1.3.4 Medway's local housing need, as a direct output from the Standard Method, is 1,636 per annum, or 24,540 over the new plan period, i.e. 2026/27 to 2040/41.
- 1.3.5 Medway Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) and a subsequent letter from the contractor, dated 11 June 2025, identified the need for Gypsy, Traveller and Travelling Showpeople accommodation in Medway as:
- 41 pitches for households that met the planning definition.
 - up to 15 pitches for undetermined households.
- 1.3.6 The GTTA identified the plot needs for travelling showpeople as:
- four plots for households that met the planning definition.
 - up to four plots for undetermined households.
- 1.3.7 The 2025 Employment Land Needs Assessment (ELNA) identified the following minimum need for employment floorspace:
- 204,000 sqm of industrial floorspace.
- 36,500 sqm of office floorspace.
- 1.3.8 Figure 1 shows the location of Medway in relation to neighbouring local planning authorities:

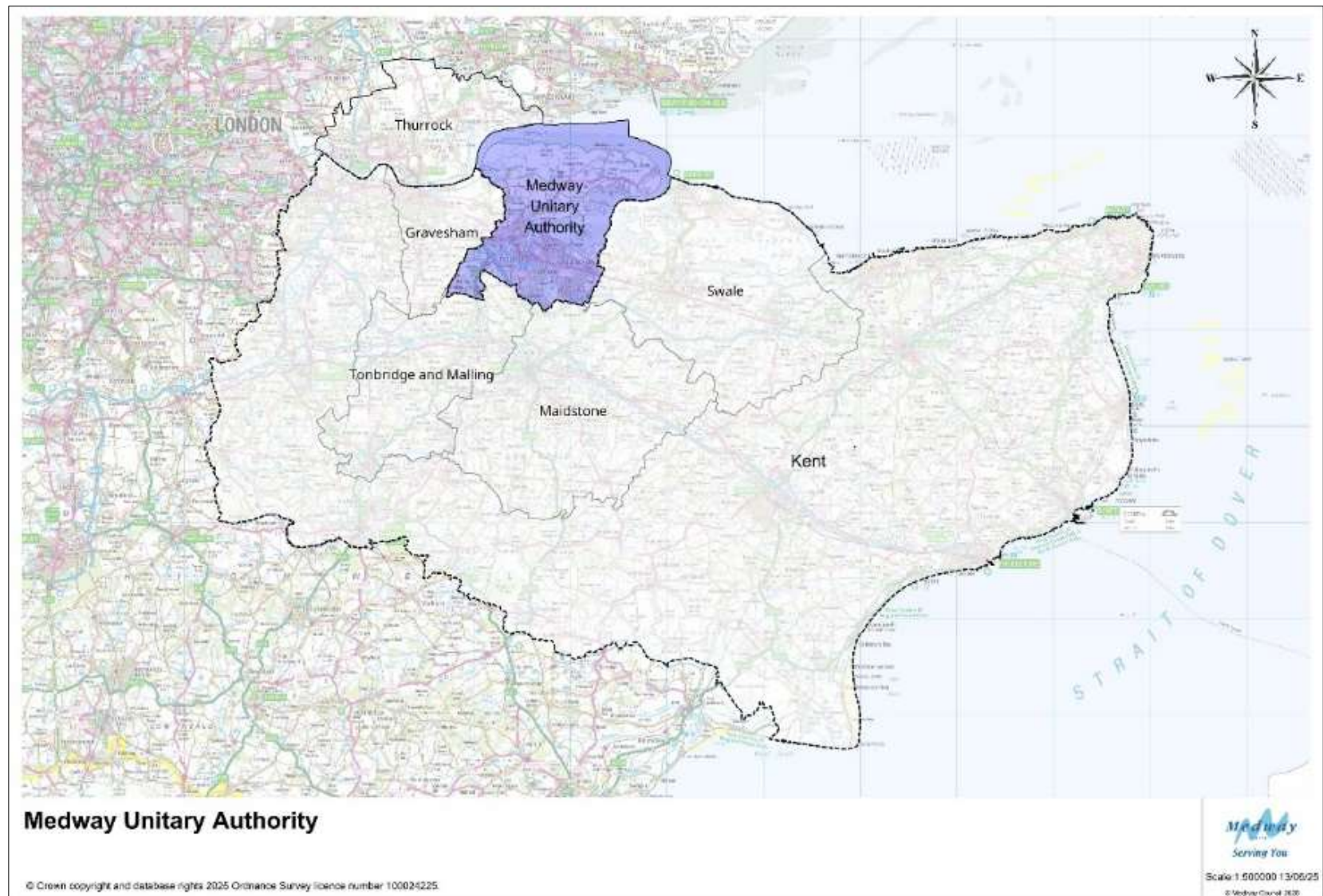


Figure 1: Location of Medway

2 Strategic Matters

2.1 Housing requirement

- 2.1.1 In DtC meetings, Medway Council has consistently stated its intention to meet its housing requirement, subject to the evidence base emerging at the time.
- 2.1.2 Medway Council's Land Availability Assessment demonstrates a sufficient housing land supply, with a buffer/surplus of 203 homes.
- 2.1.3 Gravesham Borough Council has maintained a longstanding request for Medway Council to accommodate an estimated unmet housing need of 2,000 homes through responses to consultations and during DtC meetings.
- 2.1.4 Medway Council has not received an assessment of land availability from Gravesham Borough Council, therefore two reasonable alternative growth options in the Sustainability Appraisal that included Gravesham's calculation of unmet housing need cannot be justified.
- 2.1.5 No other requests to accommodate unmet housing need have been received through responses to consultations or during DtC meetings with other local planning authorities.
- 2.1.6 On the 12 June 2025, an application to convert a former park and ride site in Wigmore was granted on appeal by a planning inspector. Planning conditions limit occupation of the site 10 touring caravans.
- 2.1.7 At the time of writing, a retrospective application to facilitate the extension of an existing gypsy and traveller site for an additional eight pitches at High Halstow is to be determined.
- 2.1.8 Medway Council will explore the potential to provide more provision of its Gypsy and Traveller site at Cuxton through intensification and/or expansion.

2.2 Strategic sites

- 2.2.1 Medway Council, Gravesham Borough Council and Maidstone Borough Council have cooperated on land to the west of Strood and the Capstone Valley.
- 2.2.2 By 2041, land to the west of Strood, together with Chapter Farm in the Gravesham borough, will comprise a cross-border sustainable location for up to 4,000 homes. It will also comprise two primary schools, a secondary school, employment land and a local centre. It will provide a transition between the urban edge of Strood and maintain the identity of the rural settlement of Three Crutches.
- 2.2.3 It is important to note that the three sites in Medway, to the west of Strood, could come forward as independent developments, regardless of Gravesham Borough Council's emerging local plan, for 1,280 homes. Having consulted National Highways, this was a key factor in the consideration of Chapter Farm as a cross-border site allocation in

Medway Council's Strategic Transport Assessment, which excluded the wider development in Gravesham. Gravesham Borough Council's equivalent assessment is being carried out by the same consultant.

- 2.2.4 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by Medway Council and Gravesham Borough Council.
- 2.2.5 The Maidstone Local Plan Review 2024 allocated land adjoining the Medway administrative area at Lidsing for mixed-use development, including 2,000 homes. Maidstone Borough Council is preparing a Lidsing Garden Settlement Supplementary Planning Document (SPD).
- 2.2.6 Medway Council's Pre-Submission Draft Local Plan includes a site allocation policy for large-scale development in the Capstone Valley, to the south of Lidsing and the M2. By 2041, the Capstone Valley will comprise a sustainable urban extension of up to 3,958 new homes, a primary school, a secondary school and a local centre. The site allocation policy is supported by a concept plan, which includes the indicative layout for Lidsing.
- 2.2.7 The concept plan shows multi-functional green infrastructure corridors extending across the areas of Medway and Maidstone.
- 2.2.8 A new secondary school, which will be part-funded by the Lidsing Garden Settlement, is required early in the plan period. Abbotts Court Farm, which is owned by Medway Council, has been identified as the optimum site to accommodate a new secondary school, subject to compensation for the loss of development value.
- 2.2.9 A new primary school, phased in the latter part of the plan period, is likely to be located within the Mill Fields site.
- 2.2.10 Improvements to M2 junction 4 will be funded and delivered by the Lidsing Garden Settlement development.

2.3 Green Belt

- 2.3.1 Site promoters have submitted representations to all three authorities about cross-border sites, i.e. Chapter Farm (Gravesham) and Holborough Quarry (Tonbridge and Malling).
- 2.3.2 Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. Development on Gravesham land would compromise the ability or the remaining Medway Green Belt to perform its functions effectively. The prospect of a comprehensive site coming forward in this location would render this location more sustainable and better aligned to the Medway Local Plan. This provides the basis for justifying exceptional circumstances for the release of Green Belt land in this location.
- 2.3.3 Medway Council has prepared a Green Belt Review and has identified most parcels of land to the west of Strood as Grey Belt land. Whilst these sites could come forward as individual proposals, there are more benefits from a comprehensive scheme. This provides the basis to justify

exceptional circumstances and to deliver sustainable development with the supporting infrastructure.

- 2.3.4 Medway Council and Gravesham BC officers have engaged in collaborative work, commissioning and progressing a masterplan to inform strategic site allocation policies for respective local plans. Further work is required to help bring this site forward through engagement with developers and preparation of a landscape-led masterplan which will be the basis for determining planning applications. Gravesham Borough Council is commissioning a Green Belt Review.
- 2.3.5 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by Medway Council and Gravesham Borough Council.

2.4 Natural environment

- 2.4.1 Medway has a rich and diverse natural environment, including areas designated of international and national significance for wildlife. These include the Medway and Thames estuaries and marshes Special Protection Areas and Ramsar sites; the Kent Downs National Landscape, Sites of Special Scientific Interest and National and Local Nature Reserves.
- 2.4.2 Designated and non-designated habitats and landscapes are under pressure from a range of impacts, including climate change, urbanisation and recreation, and there are declines in biodiversity.
- 2.4.3 In planning for a high level of development needs, the Local Plan has the potential to place additional pressure on the natural environment, but new policies can also help to support higher quality planning of green infrastructure and biodiversity net gain in development.
- 2.4.4 In addition to submitting representations to the Local Plan Regulation 18 consultations, Environment Agency, Natural England and the Kent Downs National Landscape unit have provided advice on potential site allocations and policy wording in the Medway Local Plan.
- 2.4.5 Natural England officers have provided specific advice in relation to the Local Plan HRA and SA, and attended meetings with the Council and its SA and HRA consultants.
- 2.4.6 As part of the Interim Habitats Regulations Assessment, and in line with Natural England's guidance, the change in average annual daily traffic (AADT) flows have been assessed (both alone and in-combination) for all road links within 200 metres of a European site against the 1,000 AADT screening threshold. This has indicated that there are exceedances of the 1,000 AADT threshold for a number of road links within 200m of the following European sites.
- 2.4.7 Medway Council will appoint an air quality consultant to obtain air quality modelling data. This data will be interpreted against the published critical levels and critical loads for each habitat type. The outputs of the air

quality modelling will be analysed in the context of the Habitats Regulations Assessment process.

- 2.4.8 Natural England supports a strategic approach to securing the natural environment in the context of significant development on the Hoo Peninsula, and views that this approach could provide effective mitigation.
- 2.4.9 The Council will publish an interim HRA with the Regulation 19 Pre Submission Local Plan, and will produce an updated HRA, with the outcomes of the air quality technical assessments, and further details of the Hoo Peninsula Strategic Environmental programme prior to submission of the plan for examination. Natural England has accepted this approach.
- 2.4.10 Natural England has agreed to review and provide advice on the further update to the HRA.
- 2.4.11 Natural England supports the Council in establishing a Hoo Peninsula strategic environmental programme.

2.5 Historic environment

- 2.5.1 Medway is rich in heritage and has a longstanding, positive working relationship with Historic England. Historic England has provided in-depth advice to progress evidence base work.
- 2.5.2 Kent County Council has supported Medway Council in providing site-specific assessments.
- 2.5.3 Historic England's advice and Kent County Council's support has helped to shape strategic, development management and site allocation policies.

2.6 Strategic Road Network and Major Road Network

- 2.6.1 M2 Junction 1 is located to the west of Medway where the M2 merges with the A2 and the A289. The Strategic Transport Assessment, specifically the Merge/Diverge Assessment, has identified the need to mitigate M2 Junction 1.
- 2.6.2 Improvements to M2 junction 4 will be funded and delivered by the Lidsing Garden Settlement development in the Maidstone borough.

2.7 Air quality

- 2.7.1 The Air Quality Management Area on the A2 via Newington has been identified as a strategic planning matter in DtC meetings with Swale Borough Council and Kent County Council, given the established commuting flows between Medway and Swale.
- 2.7.2 A large-scale housing development, which was promoted in the early plan-making process, to the east of Rainham was not allocated in Medway Council's Pre-Submission Draft Local Plan.
- 2.7.3 In preparing the Interim Habitats Regulations Assessment, Natural England has advised that it "... will need to consider both transport and wider development related (for example, those resulting from any

industrial development allocations) air quality emissions. Our advice remains that the air quality assessment should consider potential impacts arising from eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides) as detailed in the Interim Assessment.”

- 2.7.4 As part of the Interim Habitats Regulations Assessment, and in line with Natural England’s guidance, the change in average annual daily traffic (AADT) flows have been assessed (both alone and in-combination) for all road links within 200 metres of a European site against the 1,000 AADT screening threshold. This has indicated that there are exceedances of the 1,000 AADT threshold for a number of road links within 200m of the following European sites.
- 2.7.5 Medway Council will appoint an air quality consultant to obtain air quality modelling data. This data will be interpreted against the published critical levels and critical loads for each habitat type. The outputs of the air quality modelling will be analysed in the context of the Habitats Regulations Assessment process.

2.8 Flood risk and water management

- 2.8.1 Representations from the Environment Agency highlighted the need to deliver strategic flood risk infrastructure and river enhancement.
- 2.8.2 Medway Council commissioned a Strategic Flood Risk Assessment (SFRA), which considers the risk of flooding from all sources to inform a Sequential Test and an Exception Test, and provides guidance for the completion of site-specific flood risk assessments.
- 2.8.3 As part of the ‘Frindsbury Peninsula Opportunity Area’, the north-western and southern end could be designed to flood. This could avoid the need for ‘hard’ flood risk infrastructure to protect Chatham and Strood town centres, while creating new inter-tidal habitat.
- 2.8.4 Representations from Southern Water, and the subsequent sharing of spatial datasets and a housing trajectory, will determine infrastructure requirements.

2.9 Minerals supply

- 2.9.1 An agreed Statement of Common Ground with Kent County Council on minerals supply and waste management is presented in a separate document.

2.10 Waste management

- 2.10.1 An initial proposed Statement of Common Ground with Thurrock Council is presented in a separate document.
- 2.10.2 An agreed Statement of Common Ground with Kent County Council on minerals supply and waste management is presented in a separate document.

3 Governance Arrangements

3.1 Local Plan Implementation Group

- 3.1.1 Medway Council will establish a Local Plan Implementation Group, comprising members and planning officers. The Group will determine the governance and management arrangements for the final SoCG.
- 3.1.2 Medway Council's planning officers will be responsible for drafting the final SoCG.
- 3.1.3 Medway Council's planning officers have contacted neighbouring local planning authorities to establish lead-in times to allow for respective governance processes towards the final SoCG.

3.2 Main points of contact

- 3.2.1 Respective chief planning officers will act as the main points of contact between neighbouring local planning authorities in coordinating work towards the final SoCG.

4 Timetable and Ongoing Cooperation

4.1 Timetable

4.1.1 A final SoCG will be signed by all strategic bodies prior to the submission of Medway Council's Local Plan.

4.1.2 The table below shows a combined plan-making timetable for neighbouring local planning authorities.

Local Planning Authority	Date of adopted development plan documents	Review start date	Regulation 18 date(s)	Regulation 19 date	Submission date
Medway	Medway Local Plan 2003 Kent Waste Local Plan 1998 Kent Minerals Local Plan 1997: Chalk and Clay Kent Minerals Local Plan 1997: Oil and Gas Kent Minerals Local Plan 1993: Construction Aggregates Written Statement Kent Minerals Subject Plan 1986: Brickearth Written Statement	April 2023	September 2023 July 2024	June 2025	November 2025
Gravesham	Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)	2018	April 2018 October 2020	July 2025	December 2025

	<p>Saved policies from Gravesham Local Plan First Review (1994)</p> <p>Kent County Council Minerals and Waste Local Plan 2024-30 (2025)</p>				
Maidstone	<p>Maidstone Borough Local Plan Review 2021-38 (2024)</p> <p>Kent County Council Minerals and Waste Local Plan 2024-30 (2025)</p>	Gypsy, Traveller and Travelling Showpeople DPD in early 2025	Gypsy, Traveller and Travelling Showpeople DPD in November 2025	Gypsy, Traveller and Travelling Showpeople DPD in June 2026	Gypsy, Traveller and Travelling Showpeople DPD in December 2026
Tonbridge & Malling	<p>Core Strategy (2007)</p> <p>Development Land Allocations DPD (2008)</p> <p>Tonbridge Central Area Action Plan (2008)</p> <p>Managing Development and the Environment DPD (2010)</p> <p>Saved policies from Tonbridge and Malling Borough Local Plan (2008)</p> <p>Kent County Council Minerals and Waste</p>	TBC	October 2025	Q2 2026/27	Q3 2026/27 (by or before 12 December 2026)

	Local Plan 2024-30 (2025)				
Swale	Local Plan - Bearing Fruits 2031 (2017)	July 2017	October 2025	April 2026	July 2026
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				

4.2 Ongoing Cooperation

- 4.2.1 Medway Council will arrange a DtC meeting with Gravesham Borough Council to conclude discussions about Gravesham's calculation of unmet need in Summer 2025.
- 4.2.2 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by Medway Council and Gravesham Borough Council.
- 4.2.3 Gravesham Borough Council's traffic modelling, which is being carried out by the same consultant, may take the same approach as Medway Council, i.e. following advice from National Highways. In which case, Medway Council and Gravesham Borough Council may consider commissioning traffic modelling of the full cross-border site of 4,000 homes to inform the mitigation scheme required for M2 Junction 1.
- 4.2.4 Medway Council will consult Maidstone Borough Council in the applicant's preparation a green infrastructure strategy, an open space strategy and an approved masterplan for the Capstone Valley.
- 4.2.5 Representatives from Medway Council will continue to attend Lidsing Garden Settlement SPD meetings.
- 4.2.6 A representative from Medway Council will attend a weekly Lidsing SPD Transport Matters Meeting.
- 4.2.7 Medway Council will respond to the Lidsing Garden Settlement SPD public consultation.
- 4.2.8 Medway Council's planning and regeneration officers will continue to work with Historic England in preparing an update to the Heritage Strategy, in collaboration.
- 4.2.9 Monthly meetings will continue to be held between representatives of the National Highways Spatial Planning Team and Medway Council and their respective traffic modelling consultants, if required.
- 4.2.10 On occasion, representatives from Kent County Council and neighbouring local planning authorities will continue to be invited to the monthly meetings.
- 4.2.11 STA outputs will continue to be shared with representatives of National Highways, Kent County Council and neighbouring local planning authorities before publication.
- 4.2.12 A representative from Medway Council will attend a weekly Lidsing SPD Transport Matters Meeting.
- 4.2.13 Medway Council is a member of the Kent and Medway Air Quality Partnership. Data and information about air quality throughout Kent is combined and shared through the partnership's dedicated website, KentAir.
- 4.2.14 Prior to submission of the Local Plan, Natural England and Medway Council will cooperate on the detailed ecological interpretation of data and

the potential need for habitat survey. The final Habitats Regulations Assessment will conclude on air quality impacts at European sites.

- 4.2.15 Medway Council and Southern Water will need to conclude infrastructure requirements by 2041 for water supply and wastewater.