

Duty to Cooperate Statement Submission Document

Medway Council

Regulation 22
December 2025

Versions

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Appendix: Record of Engagement Activity

1 Introduction

1.1 Purpose and structure

- This statement outlines how Medway Council ('the Council') has prepared the Medway Local Plan 2041 (Regulation 22 Stage) in accordance with Duty to Cooperate (DtC) legislation. It sets out how and when, in the preparation of the Medway Local Plan 2041, the Council has engaged with representatives of identified DtC bodies that are prescribed in the relevant legislation.
- This statement will set out each strategic planning matter and the evidence base along with any actions, outcomes and ongoing cooperation. A record of the main engagement activity is shown in the Appendix.

1.2 Legislation

- The DtC was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans.
- A strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.
- Other prescribed bodies, in addition to local planning authorities, are subject to the DtC as set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 Strategic context

- The Medway unitary authority area sits at the mouth of the River Medway 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 and the railway 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 National Landscape. Land to the west of Medway forms part of the London metropolitan Green Belt.

- 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 limited crossing points. 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 local public transport offer beyond the main rail corridor 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.
- The Council is the local planning, transport, minerals and waste authority for the unitary authority area.
- Medway's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum, as calculated in June 2025, or 26,176 over the new plan period, i.e. 2025/26 to 2040/41.
- The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA).¹ A subsequent letter from the consultant, dated 11 June 2025, took account of updated policy, and identified the need for Gypsy and Traveller accommodation in Medway as:
 - 41 pitches for households that met the planning definition.
 - up to 15 pitches for undetermined households.
 - The GTAA identified the plot needs for travelling showpeople as:
 - four plots for households that met the planning definition.
 - up to four plots for undetermined households.
- 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.
- Figure 1 shows the location of Medway in relation to neighbouring local planning authorities:

¹ Paragraph 6.10.7 of the 'Medway Local Plan 2041: Proposed Submission Draft, Regulation 19 (June 2025)' stated the need for 31 pitches for households that met the planning definition. This predates the 'Gypsy and Traveller Accommodation Assessment – Addendum', which identified the need for 41 pitches for households that met the planning definition.

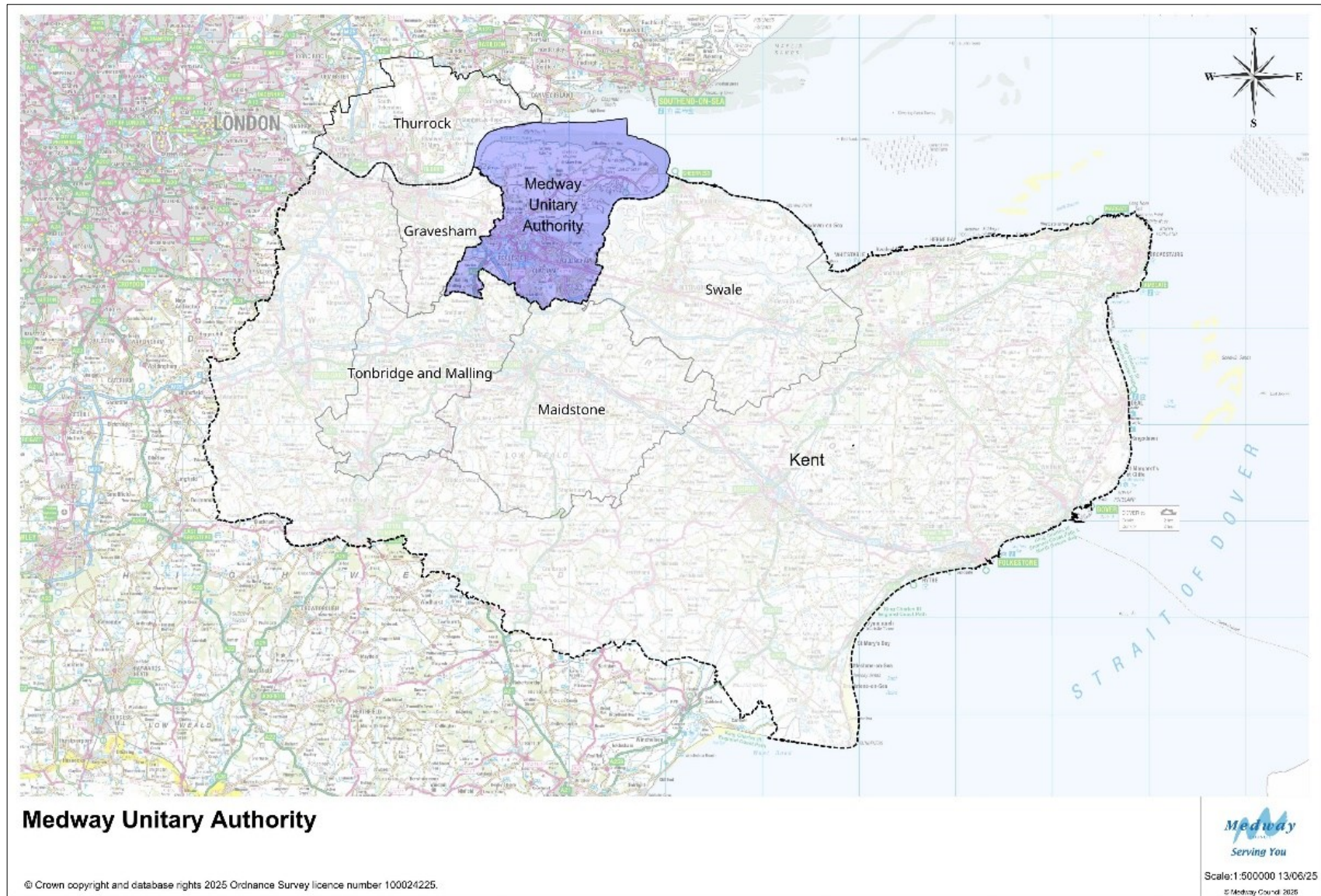


Figure 1: Location of Medway

1.4 Statements of common ground

- 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.
- The Council produced an initial proposed composite SoCG with prescribed bodies at Regulation 19 publication stage in June 2025.
- The initial proposed composite SoCG with prescribed bodies presented all matters as “Under discussion”. Strategic matters have been discussed to resolve or refine the extent of disagreement. However, some matters remain under discussion due to their complexity and the need for ongoing cooperation. This is set out in an updated composite SoCG with prescribed bodies for the Regulation 22 submission stage.
- In addition, the Council has produced the following SoCGs for the Regulation 22 submission stage:
 - SoCG with Maidstone Borough Council.
 - SoCG with National Highways.
 - An agreed SoCG with Kent County Council on minerals supply and waste management.
 - An initial proposed SoCG with Thurrock Council. At the time of writing, Thurrock Council has commissioned a waste capacity and arisings assessment and has committed to engaging with the Council once outputs are available.

2 Local Housing Need

2.1 Overview

- Medway's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum.
- The Local Housing Need Assessment found that Medway is a distinct housing market area with links to neighbouring authorities, particularly Swale and Maidstone, in terms of commuting and migration flows.
- The National Planning Policy Framework (NPPF) and the relevant Planning Practice Guidance (PPG) requires the disaggregation of the local housing need figure to assess the size, type and tenure of housing needed. The LHNA applied the long-term balancing housing markets model to determine the future demand for housing by size and tenure based on the profile of the population.
- The LHNA presented the size of owner-occupied accommodation required in Medway in 2041, in comparison to the size profile recorded in the sector at the start of the plan period. The LHNA found that of new owner-occupied housing 25.7% should have one bedroom, 26.1% two bedrooms, 16.5% three bedroom and 31.7% four or more bedrooms. The analysis was repeated for private rented, First Homes, Shared Ownership and Affordable Rented/Social Rented housing.
- The LHNA identified an overall requirement for 18.6% of housing to be Affordable Rented/Social Rented and 11.0% affordable home ownership, of which 5.6% could be Shared Ownership and 5.4% First Homes, would reflect the mix of housing that would best address the needs of the local population.
- There have been recent planning applications for Gypsy and Traveller accommodation in Medway. Medway Local Plan 2041 Policy T10 requires existing sites to be protected and intensified or expanded to meet identified needs. New sites will also be permitted, subject to criteria.
- The 'Maidstone Borough Local Plan Review 2021-38' was adopted in 2024, while Tonbridge and Malling Borough Council and Swale Borough Council are at an early stage of local plan-making. Plan-making stages set out in a respective Local Development Scheme are similar for the Council and Gravesham Borough Council.
- Up until the Council's Regulation 19 publication stage, Gravesham Borough Council maintained a longstanding request for the Council to accommodate an estimated unmet housing need of 2,000 homes.
- The Council's Sustainability Appraisal (SA) included two reasonable alternative growth options that included Gravesham's calculation of unmet housing need. It is important to note that growth options without Gravesham's calculation of unmet housing need performed better in the SA.

- At the time of writing, Tonbridge and Malling Borough Council is consulting on its emerging Local Plan (Regulation 18 stage 2), and the Council will submit its representations.
- No other requests to accommodate unmet housing need have been received through responses to consultations or during DtC meetings with other local planning authorities.

2.2 Evidence base

- Local Housing Needs Assessment
- Gypsy and Traveller Accommodation Assessment
- Sustainability Appraisal
- Land Availability Assessment

2.3 Strategic bodies

- Gravesham Borough Council
- Maidstone Borough Council
- Swale Borough Council
- Tonbridge and Malling Borough Council

2.4 Actions

- In DtC meetings, planning officers from the Council and Swale Borough Council consistently stated the intention to meet local housing need, subject to the evidence base emerging at the time.
- The Council requested further information from Gravesham Borough Council to demonstrate their calculation of unmet housing need.
- In October 2025, Tonbridge and Malling Borough Council wrote to the Council and other neighbouring local planning authorities in relation to the preparation of its Regulation 18 (2024) Local Plan. Tonbridge and Malling Borough Council outlined its work in identifying development needs and how these could be met in the new Tonbridge and Malling Local Plan. The emerging proposals include the release of land in the Green Belt. In pursuing a spatial option which includes the release of Green Belt, Tonbridge and Malling Borough Council is preparing an exceptional circumstances case to justify the release of designated sites. This work is being informed by discussions with neighbouring authorities to explore if they could accommodate some of the identified need for development in Tonbridge and Malling.

2.5 Outcomes

- The Council will explore the potential for more Gypsy and Traveller accommodation at Cuxton through intensification and/or expansion.

- The Council did not receive an assessment of land availability from Gravesham Borough Council, therefore two reasonable alternative growth options in the SA that included Gravesham's calculation of unmet housing need could not be justified. In response to the Council's Regulation 19 consultation, Gravesham Borough Council did not raise any objections under soundness or legal compliance.
- The Council has indicated that it is unable to assist in meeting unmet housing need arising from Tonbridge and Malling due to evident constraints and the advanced stage of local plan-making.

2.6 Ongoing cooperation

- The Council will submit representations to Tonbridge and Malling Borough Council on its emerging Local Plan (Regulation 18 stage 2).

3 Employment Land

3.1 Overview

- The 2025 ELNA identified the following minimum need for employment land:
 - 204,000 sqm of industrial floorspace.
 - 36,500 sqm of office floorspace.
- There is a large pipeline of consented employment land, but this is in remote locations at Kingsnorth and the Isle of Grain, which provide for specific needs, and there is a shortage of built stock. Additional sites for employment uses have been allocated to provide for the wider employment market needs and to support sustainable growth. The Council can meet its need for employment land.
- Tonbridge and Malling Borough Council has identified Green Belt sites for release to meet its employment land needs in its Regulation 18 stage 2 Local Plan.

3.2 Evidence base

- Employment Land Needs Assessment

3.3 Strategic bodies

- Tonbridge and Malling Borough Council

3.4 Actions

- In October 2025, Tonbridge and Malling Borough Council asked the Council if it can assist in meeting any unmet office floorspace E(g)i need.

3.5 Outcomes

- The Council has indicated that it is unable to assist in meeting Tonbridge and Malling Borough Council's unmet employment land need due to the weak office market in Medway and the advanced stage of local plan-making.

4 Retail

4.1 Overview

- Hempstead Valley district centre is unique amongst the Medway centres in that it comprises, in its entirety, a purpose-built indoor shopping centre. Although a district centre in retailing terms, the lack of a 'high street' and the relative shortage of non-retail facilities means that Hempstead Valley functions in a different way to the 'traditional' district centres. There is ample free car parking and there are advantages over the traditional town centres in Medway in that expansion and/or reconfiguration is much easier for modern stores.
- There have been proposals for expansion at Hempstead Valley, with a particular focus on commercial leisure uses in recent years.
- The Medway Retail and Town Centres Study 2025 did not recommend a quantitative need for retail floorspace. Rather, new retail floorspace will be directed to designated town centres, while areas of large-scale growth will provide new local centres.

4.2 Evidence base

- Medway Retail and Town Centres Study (2025)

4.3 Strategic bodies

- Maidstone Borough Council

4.4 Actions

- Maidstone Borough Council responded to the Council's local plan-making consultations in 2023, 2024 and 2025.

4.5 Outcomes

- Hempstead Valley will support the proposed growth of the Lidsing Garden Community in the Maidstone borough.

4.6 Ongoing cooperation

- New proposals for Hempstead Valley will be considered on their own merits and in terms of its role and function in the retail hierarchy.

5 Strategic Sites

5.1 Overview

- The Council has cooperated with Gravesham Borough Council, Maidstone Borough Council and Tonbridge and Malling Borough Council on cross-border locations for growth.
- By 2041, land to the west of Strood, together with Chapter Farm in the Gravesham borough, will comprise a sustainable location for up to 4,000 homes, 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.
- In recent years, development at East Hill and Gibraltar Farm – both in the Capstone Valley – has been granted consent following planning appeals. More recently, 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 Community Supplementary Planning Document (SPD).
- The Council's Pre-Submission Draft Local Plan includes a site allocation policy for large-scale development in the Capstone Valley. 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 the Lidsing Garden Community.
- The concept plan shows multi-functional green infrastructure corridors extending across the areas of Medway and Maidstone.
- A new secondary school, which will be part-funded by the Lidsing Garden Community, is required early in the plan period.
- Improvements to M2 junction 4 will be funded and delivered by the Lidsing Garden Community.
- At the time of writing, Tonbridge and Malling Borough Council is consulting on its emerging Local Plan (Regulation 18 stage 2). The emerging plan proposes to allocate 'Land north of Holborough Lakes, Snodland' for 1,300 homes. This is part of a cross-border Holborough Quarry site that has also been promoted for allocation in the Medway Local Plan 2041.
- The Innovation Park Medway site straddles the administrative areas of Medway and Tonbridge and Malling. The site is part of the north Kent Enterprise Zone. The Council and Tonbridge and Malling Borough Council separately adopted a Local Development Order (LDO), masterplan and a design code for the site in 2020/21. Not all of the site has so far been built out. Following commercial market changes and options appraisal work, the Council intends to revoke the LDO and to pursue a mixed-use development comprising commercial uses (office

and research), a care home and retirement units. Medway Local Plan 2041 Policy SA14: Employment Sites, therefore, identifies the site to deliver B2 - 11,248 sqm and E(g)iii - 21,000 sqm, between years 1-10 of the plan period.

5.2 Evidence base

- Land Availability Assessment
- Strategic Transport Assessment
- Infrastructure Delivery Plan
- Green Belt Review
- Landscape Character Assessment
- Green and Blue Infrastructure Framework
- Kent and Medway Local Nature Recovery Strategy

5.3 Strategic bodies

- Gravesham Borough Council
- Maidstone Borough Council
- Tonbridge and Malling Borough Council
- Kent County Council

5.4 Actions

- Gravesham Borough Council, Maidstone Borough Council and Tonbridge and Malling Borough Council responded to the Council's local plan-making consultations in 2023, 2024 and 2025.
- Numerous, regular meetings have been held between representatives of Gravesham Borough Council and the Council, most recently to guide consultants appointed by Gravesham Borough Council on an emerging masterplan.
- Numerous, regular meetings have been held between representatives of Maidstone Borough Council and the Council, most recently to guide the Lidsing Garden Community SPD.
- The Council identified Abbotts Court Farm in the Capstone Valley as the optimum site to accommodate a new secondary school, subject to compensation for the loss of development value.
- The Holborough Quarry promoter hosted site visits of representatives from the Council and Tonbridge and Malling Borough Council in 2024 and 2025.
- Following discussions, Tonbridge and Malling Borough Council is taking forward the part of the site within their borough as a draft allocation in their emerging Local Plan; Policy A1: Housing and Employment Allocations identifies the site with reference E9 to deliver B2 - 14,000sqm during their plan period.

5.5 Outcomes

- Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. These sites were subsequently deemed suitable, available and achievable in the LAA. This provides the basis for demonstrating exceptional circumstances for releasing land in the Green Belt.
- A new primary school and a new secondary school will help to provide for future residents of the Lidsing Garden Community.
- Multi-functional green infrastructure corridors extending across the areas of Medway and Maidstone are more likely to deliver on the objectives of the Kent and Medway Local Nature Recovery Strategy.
- The Holborough Quarry site was rejected for allocation in the Council's site selection process. In response to the Council's Regulation 19 consultation, Tonbridge and Malling Borough Council set out its support for the Council's spatial strategy, noting the potential coalescence between settlements.
- Tonbridge and Malling Borough Council is supportive of the change in policy approach for Innovation Park Medway.

5.6 Ongoing cooperation

- Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, respecting the setting of the Kent Downs National Landscape, will be approved by the Council and Gravesham Borough Council.
- The 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.
- The Council will submit representations to Maidstone Borough Council on its Lidsing Garden Community SPD.
- The Council will collaborate with Maidstone Borough Council on a strategic approach to mitigating the potential impacts of planned growth on the North Downs Woodlands Special Area of Conservation (SAC).
- The Council is cooperating with the neighbouring Local Education Authority, Kent County Council, regarding the need for a new secondary school, which will be part-funded by the Lidsing Garden Community, in the early part of the plan period.
- The Council will submit representations to Tonbridge and Malling Borough Council on its emerging Local Plan (Regulation 18 stage 2).
- Discussions are ongoing between the Council and Tonbridge and Malling Borough Council as to the timing of Innovation Park Medway LDO revocation.

6 Green Belt

6.1 Overview

- The Metropolitan Green Belt terminates in the west of Medway, with less than five per cent of the Medway unitary authority area designated as Green Belt. Larger areas of contiguous Green Belt are located within the neighbouring boroughs of Gravesham and Tonbridge and Malling.
- Site promoters have submitted representations to all three authorities about cross-border sites, i.e. Chapter Farm (Gravesham) and Holborough Quarry (Tonbridge and Malling).

6.2 Evidence base

- Medway Green Belt Review (2025)
- Gravesham Stage 2 Green Belt Study (2020)
- Tonbridge and Malling Stage 2 Green Belt Assessment: Exceptional Circumstances (Strategic) Note (2022)

6.3 Strategic bodies

- Gravesham Borough Council
- Tonbridge and Malling Borough Council

6.4 Actions

- Gravesham Borough Council and Tonbridge and Malling Borough Council responded to the Council's local plan-making consultations in 2023, 2024 and 2025.
- The Holborough Quarry promoter hosted site visits of representatives from the Council and Tonbridge and Malling Borough Council in 2024 and 2025.

6.5 Outcomes

- Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. These sites were subsequently deemed suitable, available and achievable in the LAA. This provides the basis for demonstrating exceptional circumstances for releasing land in the Green Belt.
- Planning officers from the Council and Gravesham Borough Council worked collaboratively to commission Green Belt reviews, including a bid to secure funding.
- Planning officers from the Council and Gravesham Borough Council worked collaboratively to commission a landscape-led masterplan for the land to the west of Strood/Chapter Farm site.

6.6 Ongoing cooperation

- 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 the Council and Gravesham Borough Council.

7 Natural Environment

7.1 Overview

- The Council works in partnership across the county and sub-county geographies in developing and implementing policies and projects to conserve and enhance the natural environment. These include the Kent and Medway Local Nature Recovery Strategy, North Kent Bird Wise and the Kent Downs National Landscape.
- The Kent Downs National Landscape unit provides more detailed advice on National Landscape matters for Natural England.
- As part of the Interim Habitats Regulations Assessment (HRA), and in line with Natural England's guidance, the change in average annual daily traffic (AADT) flows were 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 indicated exceedances of the 1,000 AADT threshold for road links within 200m of European sites.
- Traffic and air quality modelling undertaken in support of the Maidstone Borough Local Plan Review demonstrated that adverse air quality effects on the integrity of North Downs Woodlands SAC can be avoided, alone or in combination with other plans or projects. The modelling approach took account of mitigation associated with traffic calming along Boxley Road / Lidsing Road, and the new link road for Lidsing Garden Community. Similarly, as part of the HRA for the Medway Local Plan, adverse air quality impacts at the North Downs Woodlands SAC have been identified.

7.2 Evidence base

- Landscape Character Assessment
- Green and Blue Infrastructure Framework
- Kent and Medway Local Nature Recovery Strategy
- Infrastructure Delivery Plan
- Medway Local Plan Sustainability Appraisal
- Medway Local Plan Habitats Regulations Assessment
- North Kent Bird Wise Strategy, Bird Disturbance Study and Visitor Survey
- Environment Agency Medway Estuary and Swale programme

7.3 Strategic bodies

- Natural England
- National Highways
- Marine Management Organisation
- Kent County Council
- Maidstone Borough Council

- Kent Downs National Landscape Unit

7.4 Actions

- Natural England has provided specific guidance in relation to the HRA. The Council produced an interim HRA at Regulation 19 publication stage. The Council has produced an updated HRA for Regulation 22 submission stage.
- The Council appointed a consultant to obtain air quality modelling data to inform further work on the HRA. This data has been interpreted against the published critical levels and critical loads for each habitat type. The outputs of the air quality modelling have been analysed in the context of the HRA process.
- In response to the Council's Regulation 18 and 19 consultations, the Marine Management Organisation set out the need to refer to relevant licensing requirements, the South East Marine Plan (2021), the Marine and Coastal Access Act 2009 and the Marine Policy Statement.

7.5 Outcomes

- The air quality modelling required an ecological interpretation in an Appropriate Assessment of the North Kent Marshes European sites and the North Downs Woodlands SAC.
- The updated HRA found no exceedances at the North Kent Marshes European sites, therefore no further action is required.
- The updated HRA recommends a strategic approach to reduce impacts of increased traffic flows at the North Downs Woodlands SAC.
- The connectivity between the Kent Downs National Landscape and Darland Banks is recognised as a shared objective between the Council and Maidstone Borough Council.
- The Council recognises the need to include relevant signposting to relevant licensing requirements, the South East Marine Plan (2021), the Marine and Coastal Access Act 2009 and the Marine Policy Statement through modifications to the Medway Local Plan 2041.

7.6 Ongoing cooperation

- The Council will produce a final HRA, including a Strategic Mitigation Strategy for the Capstone Valley and further details of the Hoo Peninsula Strategic Environmental Programme, for the examination. Natural England has accepted this approach.
- The Council and Maidstone Borough Council will be engaged in ongoing cooperation to determine a strategic mitigation approach for the North Downs Woodlands SAC to be agreed with Natural England and the relevant highway authorities.

8 Historic Environment

8.1 Overview

- The Council has a longstanding, positive working relationship with Historic England and Kent County Council through their specialist heritage service.

8.2 Evidence base

- Medway Heritage Strategy
- Chatham Design Code
- Medway Heritage Asset Review (2025)
- Star Hill to Sun Pier Development Framework (2024)

8.3 Strategic bodies

- Historic England
- Kent County Council

8.4 Actions

- Historic England's and Kent County Council's representations included suggested changes to several policies.

8.5 Outcomes

- Historic England's and Kent County Council's guidance has helped to shape strategic, development management and site allocation policies.

8.6 Ongoing cooperation

- The Council recognises the need for suggested changes to several policies through modifications to the Medway Local Plan 2041.
- The Council's planning officers will continue to work with Historic England and Kent County Council in preparing an update to the Heritage Strategy.

9 Strategic Road Network and Major Road Network

9.1 Overview

- National Highways is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN), comprising of motorways and all-purpose trunk roads in England.
- The Council is the local transport authority.
- Kent County Council is the neighbouring local transport authority.
- Figure 2 shows SRN and Major Road Network (MRN) routes spanning in and around Medway.



Figure 2: M2 Junctions

- Figure 2 shows the locations of M2 junctions 2, 3, 4 and 5. Junctions 2 and 4 are within Medway.
- M2 Junction 1 is located to the west of Medway where the M2 merges with the A2 and the A289 of the MRN. The STA has identified the need to mitigate M2 Junction 1.
- M2 Junction 3 is located to the south of Medway where the M2 merges with the A229 of the MRN. The STA has identified the need to mitigate the northbound approach from M2 Junction 3 to the M2 and on the A229 approach. Kent County Council is developing a business case for the A229 Blue Bell Hill Improvement Scheme.
- Improvements to M2 junction 4 will be funded and delivered by the Lidsing Garden Community in the Maidstone borough.
- M2 junction 5 improvements were completed in 2025.

- The Lower Thames Crossing (LTC), a new road that will connect Kent and Essex through a tunnel beneath the River Thames, has been granted development consent. The LTC will divert traffic routing to/from the Channel Tunnel Terminal and the Port of Dover away from the Dartford Crossing. This will exacerbate the limited capacity – particularly via M2 junctions 1, 2 and 3 – and generate more traffic locally once travel across the River Thames becomes more attractive. This is acknowledged in paragraph 7.5.8 of the project's Transport Assessment. However, the project does not include changes to the northbound off-slip and southbound on-slip links at M2 Junction 1.

9.2 Evidence base

- The Strategic Transport Assessment (STA) has informed the preparation of the Medway Local Plan 2041. The STA has been tailored to meet the requirements of National Highways and the neighbouring local transport authority, Kent County Council. The STA involved iterative assessments of cumulative impacts associated with committed development and future development up to 2041. The STA has identified what and when mitigations will be required.

9.3 Strategic bodies

- National Highways
- Kent County Council
- Gravesham Borough Council
- Maidstone Borough Council
- Tonbridge and Malling Borough Council

9.4 Actions

- Monthly meetings have been held between representatives of the National Highways Spatial Planning Team and the Council and their respective traffic modelling consultants, when required.
- The National Highways Spatial Planning Team committed to prioritising any email correspondence.
- National Highways provided comments on draft STA outputs, and these comments were taken into account prior to finalising the STA.
- For M2 Junction 1, the Council appointed a consultant to:
 - determine whether the design could satisfy the relevant design standards;
 - determine whether the design could satisfy the relevant safety standards; and
 - produce a high-level order of magnitude costs.
- For M2 Junction 4, the Council appointed a consultant to identify an interim scheme and indicative costings should the Lidsing Garden

Community not deliver the necessary improvement scheme (fourth arm). The Council has requested an update from all parties regarding the progress of this scheme.

9.5 Outcomes

- A draft Data Collection Report and a draft Local Model Validation Report were approved by both National Highways and Kent County Council. The Medway Transport Model was declared fit for purpose.
- The STA methodology was approved by both National Highways and the neighbouring local transport authority, Kent County Council, to enable the scenarios testing to begin early in the plan-making process.
- Relevant strategic bodies could consider outputs before the start of formal consultations. Their representations helped to change the scope of the STA, including the forecast year changing from 2040 to 2041, and the need for a transport strategy.
- Technical matters were resolved in a timely manner about:
 - a historic consent on the Isle of Grain;
 - trip rates for consented flexible use classes at Kingsnorth;
 - the certainty/status of developments outside Medway, such as the Lidsing Garden Settlement and Highsted Park;
 - treatment of potential cross-border site allocations;
 - sensitivity testing for the Lower Thames Crossing;
 - the need for detailed modelling of M2 Junction 3; and
 - the need for an interim scheme for M2 Junction 4.
- The Council and Gravesham Borough Council engaged the Thames Estuary Growth Board about M2 Junction 1.
- National Highways is content that the STA, subject to some continued joint working to evolve, finalise and agree all aspects (particularly concerning M2 junctions 1, 3 and 4) provide appropriate, proportionate evidence of how the methodology and assumptions applied to the Regulation 19 modelling and associated assessments have been developed and, in principle, agreed.

9.6 Ongoing cooperation

- Monthly meetings will continue to be held between representatives of the National Highways Spatial Planning Team and the Council and their respective traffic modelling consultants, if required.
- On occasion, representatives from Kent County Council and neighbouring local planning authorities will continue to be invited to the monthly meetings.
- STA outputs will continue to be shared with representatives of National Highways, Kent County Council and neighbouring local planning authorities before publication.

- For M2 Junction 1, the Council will collaborate with National Highways, Kent County Council and Gravesham Council on the following sequential tasks:
 - establish governance arrangements;
 - produce an updated merge and diverge assessment;
 - establish a revised trip cap;
 - assess how many more development completions could be tolerated;
 - produce an initial feasibility assessment for an improvement scheme;
 - develop an improvement scheme, along with an assessment of timing, feasibility and funding; and
 - determine how proportionate developer contributions could be collected.
- A representative from the Council will continue to attend quarterly A229 Blue Bell Hill Project Board meetings.
- The Council will continue to cooperate with all parties to deliver a mitigation scheme for M2 Junction 4.
- Representatives from the Council will attend Lower Thames Crossing technical working groups.

10 Air Quality (Human Health)

10.1 Overview

- The Council has a statutory duty to monitor, review and assess air quality in Medway under the Environment Act 1995. This involves comparing the measured and predicted pollutant levels to national air quality standards and objectives.
- There are four areas in Medway where air quality does not meet the objectives for the pollutant nitrogen dioxide. The Council has designed four air quality management areas in Central Medway, Pier Road, Rainham High Street and Four Elms Hill.

10.2 Evidence base

- Strategic Transport Assessment

10.3 Strategic bodies

- Swale Borough Council
- Kent County Council

10.4 Actions

- The Air Quality Management Area (AQMA) 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.

10.5 Outcomes

- As part of the STA, the Forecasting Report (2024) included site RSE10, a large-scale housing development to the east of Rainham. The Forecasting Report (2024) highlighted adverse impacts at the High Street and Moor Street (A2) / Meresborough Road junction, which is part of an AQMA. Planning officers considered that, due to the constraints of the local road network, these adverse impacts could not be mitigated. Site RSE10 was not selected for allocation.

10.6 Ongoing cooperation

- The 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.

11 Flood Risk

11.1 Overview

- In response to the Council's Regulation 19 consultation, the Environment Agency raised concerns about:
 - the model used as the basis for the Strategic Flood Risk Assessment (SFRA);
 - the application of the Sequential Test and the Exception Test in the Council's site selection process; and
 - the need to identify necessary flood defences and their associated funding and delivery.

11.2 Evidence base

- Strategic Flood Risk Assessment (May and November 2025)

11.3 Strategic bodies

- Environment Agency

11.4 Actions

- The Environment Agency responded to the Council's local plan-making consultations in 2023, 2024 and 2025.
- The Council published surface water management plans for Hoo, Rainham, Lower Stoke and Middle Stoke in 2024.
- The Council shared spatial datasets and a housing trajectory with the Environment Agency.
- The Council's consultant updated the SFRA (November 2025) based on the North Kent Coast Flood Domain 2 Model, along with the Sequential Test and the Exception Test, and this has been shared with the Environment Agency.
- The Council's planning officers have produced a Flood Risk Topic Paper.
- The Council's planning officers shared the Site Selection Process Topic Paper and the Housing Delivery Topic Paper prior to submission of the Medway Local Plan 2041.

11.5 Outcomes

- The Environment Agency's concerns about flood defences justify the need for an alternative 'stepped' housing trajectory, which has been set out in the Housing Delivery Topic Paper.

11.6 Ongoing cooperation

- The Council is collaborating with the Environment Agency to commission an update to an assessment of flood defences conducted in 2011, and to coordinate with the Medway Estuary and Swale Flood and Coastal Erosion Risk Management (2019) and the Thames Estuary 2100 Plan (2012). This matter will require ongoing, long-term collaboration.
- The Council recognises the need for suggested changes to several policies through modifications to the Medway Local Plan 2041.

12 Community Facilities

12.1 Overview

- Health, social care, community, sport, and leisure facilities are important in enhancing people's quality of life and developing the social wellbeing of individuals and communities. The co-location of these facilities creates a supportive environment that encourages healthy lifestyle choices, fosters community interaction and cohesion.

12.2 Evidence base

- The Playing Pitch Strategy was finalised in October 2019 and covered the period 2018 to 2035.

12.3 Strategic bodies

- Sport England
- NHS Kent and Medway
- NHS Property Services

12.4 Actions

- The strategic bodies responded to the Council's local plan-making consultations in 2023, 2024 and 2025.

12.5 Outcomes

- The Council is collaborating with Sport England to commission an updated Playing Pitch Strategy and a Built Facilities Plan.

12.6 Ongoing cooperation

- NHS Kent and Medway, with the Medway and Swale Health and Care Partnership, will carry out a refreshed feasibility and infrastructure needs assessment covering Strood Town Centre, Strood West and Frindsbury Peninsula.
- The Council will collaborate in identifying opportunities for a future healthcare facility in the Capstone Valley, taking account of the Lidsing Garden Community.
- The Council will clarify anticipated housing delivery on the Hoo Peninsula; this will inform the potential need for expansion of current healthcare facilities to meet interim demands, in advance of a new integrated healthcare facility at no cost to the NHS.
- The Council recognises the need for suggested changes to several policies through modifications to the Medway Local Plan 2041.

13 Minerals Supply

13.1 Overview

- The Council, as Minerals Planning Authority (MPA) for Medway, is responsible for ensuring sufficient supply of minerals and safeguarding mineral resources and infrastructure.
- Land won resources include sharp sand and gravel (mainly Hoo Peninsula), with no significant soft sand or crushed rock resources locally.
- Medway relies significantly on imported aggregates, particularly marine-dredged sand and gravel, brought in through its strategically important network of safeguarded wharves and rail depots.

13.2 Evidence base

- The Local Aggregates Assessment is updated annually using the latest sales and reserve data. It summarises Medway's supply/demand balance and role in regional flows.
- Medway Minerals and Waste Topic Paper provides information on mineral resources, imports, infrastructure capacity and supply gaps.

13.3 Strategic bodies

- Kent County Council, as neighbouring MPA, supports cross-border cooperation on minerals safeguarding, aggregate flows, and future supply planning.
- The South East England Aggregates Working Party (SEEAWP) is a regional technical advisory group set up under the UK Government's 'Managed Aggregates Supply System' (MASS) framework. SEEAWP comprises mineral planning authorities (MPAs) across the south east of England (including the Council), along with industry representatives (such as from the Mineral Products Association), the Crown Estate (for marine dredging), and the Ministry for Housing, Communities and Local Government (MHCLG). SEEAWP is the key forum for coordinating evidence, data, and monitoring related to the supply and demand of construction aggregates across the South East. SEEAWP provides exchange, scrutiny of LAAs, and coordinated response to regional supply challenges.
- Medway has also liaised with East Sussex County Council, Brighton and Hove City Council, the South Downs National Park Authority and other regional MPAs to prepare a SoCG on aggregate supply and safeguarding (2022).

13.4 Actions

- Maintained constructive dialogue on aggregate supply and demand through SEEAWP meetings and data returns.
- Engagement has taken place with Kent County Council to prepare a SoCG (2024) that recognises cross-boundary supply, the need for safeguarding, and identification of areas for potential new extraction.
- Cooperation with Kent County Council and regional partners to monitor and address emerging supply issues or infrastructure pressures.
- An annual Local Aggregates Assessment has been prepared reflecting land-won, marine-won, recycled and secondary aggregates, incorporating SEEAWP advice.
- Safeguarded critical wharves and rail depots to secure capacity for imports and onward distribution.
- Identified new 'areas of search' for sand and gravel extraction to ensure future supply resilience.
- Responded to consultation feedback by reinforcing safeguarding and confirming cross-boundary supply role.

13.5 Outcomes

- Shared understanding with Kent County Council and regional MPAs on continued reliance on Medway's marine import infrastructure for aggregate supply.
- SoCG with Kent County Council countersigned by SEWPAG.
- Incorporated robust safeguarding provisions into policies to protect existing supply capacity.
- Confirmed mutual recognition of Medway's limited indigenous resources and its reliance on imports, particularly soft sand from Kent and crushed rock via marine/rail.
- Identification of 'areas of search' for future sharp sand and gravel extraction.
- No objections raised by SEEAWP partners or Kent County Council concerning Medway's minerals planning approach.
- Strong alignment of Medway's minerals policies with the Managed Aggregates Supply System (MASS), supporting steady and adequate supply at local and regional levels.
- Coordinated cross-boundary planning ensures that Medway's sharp sand and gravel output can contribute to Kent's supply, and Kent's soft sand resources can help meet Medway's needs.

13.6 Ongoing cooperation

- Maintain active engagement through SEEAWP annual monitoring, SoCG updates, and Local Aggregates Assessment processes.

- Continued participation in SEEAWP meetings and data sharing exercises.
- Review of the SoCG with Kent as part of future plan-making.
- Future updates to the Medway Local Plan 2041 will be developed in consultation with Kent, SEEAWP, and regional partners to maintain consistent approach to minerals, in particular aggregate, supply matters.
- Continue cross-boundary planning dialogue, particularly regarding long-term safeguarding and potential compensatory capacity where necessary.

14 Waste Management

14.1 Overview

- The Council is the Waste Planning Authority for its area, responsible for planning the future management of all waste streams.
- Medway relies on regional infrastructure for some waste streams, notably landfill capacity in Thurrock and hazardous waste treatment elsewhere.
- Key principles relating to strategic matters:
 - Plan for net self-sufficiency: ensure sufficient capacity to manage an equivalent amount of waste to that arising within Medway, accounting for necessary imports/exports.
 - Apply the proximity principle: prioritise managing waste as close to source as feasible, making use of regional or specialist facilities only where justified.

14.2 Evidence base

- The Waste Needs Assessment (WNA, 2024) and Minerals and Waste Topic Paper provide the evidence base for forecasting arisings, capacity needs, and cross-boundary movements.
- Specific Medway WNA 2024 Update report on 'Strategically Significant Cross-Boundary Movements' identifies key export destinations for waste arising in Medway which include the following: Kent (non-inert waste), Thurrock (landfill), Southwark (Materials Recycling Facility utilised for LACW), and Suffolk (hazardous waste).
- South East Waste Planning Advisory Group (SEWPAG) SoCG (2020) sets out regional principles for waste planning and including thresholds for strategic flows (10,000tpa inert, 5,000 tpa non-hazardous; 100 tpa hazardous) requiring active engagement under DtC.
- SEWPAG membership provides regional data, joint principles on capacity and movements, and joint position statements on key matters.
- Register of correspondence tracks bilateral discussions with neighbouring Waste Planning Authorities.

14.3 Strategic bodies

- Kent County Council: key partner on cross-boundary flows and infrastructure provision/safeguarding (in particular 'other recovery').
- Thurrock Council: hosts non-hazardous landfill capacity used by Medway's residual municipal waste, formalised under the draft SoCG.
- London Borough of Southwark: operates the Southwark Integrated Waste Management Facility, processing ~15,000 tpa of Medway's dry recyclables under commercial contract.

- SEWPAG: regional body supporting strategic cooperation on approaches to waste planning, landfill provision, other recovery (e.g. Energy from Waste) capacity and hazardous waste
- The Council's membership of SEWPAG provides access to a regional forum for addressing strategic waste flows, capacity gaps, and regional infrastructure planning (in particular landfill and 'other recovery').

14.4 Actions

- Undertook targeted DtC engagement with all authorities receiving strategically significant waste flows (Kent, Thurrock, Southwark, Suffolk, etc.) using thresholds from SEWPAG SoCG.
- Statements of Common Ground with Kent (July 2024), Thurrock (June 2025 (Draft)), and Southwark (March 2022) document cross-boundary arrangements and cooperation.
- Mapped cross-boundary capacity dependencies, especially for hazardous waste, non-inert waste recovery, and landfill, to inform robust plan approach.
- Waste policies safeguard existing waste facilities and encourage new capacity aligned with the Waste Hierarchy.
- Analysis of consultation responses informed refinement of recycling, landfill diversion and recovery targets.
- Responded to consultation feedback by strengthening commitments to net self-sufficiency and the proximity principle, recognising some specialist waste streams necessarily require export.

14.5 Outcomes

- Achieved agreement with key receiving WPAs on the continuation of strategic waste movements, documented in SoCGs and confirmed via correspondence records.
- Draft SoCG with Thurrock (2025) covers ongoing use of Ockendon landfill for non-hazardous waste.
- SoCG with Southwark (2022) formalises the arrangement for managing Medway's dry recyclables at Southwark's Integrated Waste Management Facility (IWMF).
- The Medway Local Plan 2041 aims to ensure sufficient waste management capacity, move waste up the waste hierarchy, and achieve net self-sufficiency, in line with national policy.
- Updated policies to ensure Medway maintains sufficient recycling, recovery, and processing capacity to meet anticipated needs through 2041, aligned with national targets (e.g., 65–70% recycling by 2035–2041).
- Safeguarding policies included in the draft Local Plan to protect waste infrastructure and require compensatory capacity if loss is proposed.

- Ensured no significant objections from DtC bodies at Regulation 18 stage regarding Medway's waste strategy, reflecting constructive engagement and shared understanding.
- Confirmed that Medway's reliance on specialist external facilities (e.g., hazardous waste treatment, Thurrock landfill) is reasonable, justified, and supported by hosting authorities.
- No capacity concerns raised by neighbouring WPAs regarding Medway's exported hazardous or specialist wastes, indicating effective cooperative planning.
- Sustained access to landfill capacity in Thurrock for non-hazardous municipal waste, supporting continuity of disposal arrangements.
- Efficient recycling outcomes through partnership with Southwark IWMF, maximising the use of high-quality, regionally significant infrastructure.
- Alignment with SEWPAG's regional net self-sufficiency and waste hierarchy principles, ensuring Medway's planning does not place disproportionate burden on neighbouring areas.

14.6 Ongoing cooperation

- Review SoCGs with Kent, Thurrock, Southwark, other relevant WPAs and SEWPAG, updating as strategic issues evolve or new dependencies arise.
- Continuous engagement through SEWPAG to monitor regional waste planning trends, shared capacity issues, and opportunities for collaborative solutions.
- Ongoing bilateral dialogue with Kent, Thurrock, and other receiving authorities to monitor imported/exported waste streams, address any capacity changes, and update policies as required.
- Integration of waste planning commitments into the next stages of the Medway Local Plan, ensuring future plan iterations reflect evolving regional and national waste management requirements.
- Participate in SEWPAG participation to monitor regional waste capacity trends and coordinate future planning responses.
- Monitor cross-boundary waste movements and capacity utilisation through regular data sharing, correspondence, and SEWPAG engagement.
- Continue engagement with all WPAs receiving strategic flows from Medway, especially in light of future capacity constraints or contract changes.

Appendix

Record of Engagement Activity

