

# **Statement of Common Ground with Prescribed Bodies**

## **Submission Document**

Medway Council

Regulation 22  
December 2025

## Versions

Version	Name	Date
1	Initial Proposed Composite Statement of Common Ground with Strategic Bodies	12 June 2025
2	First Draft Statement of Common Ground with Prescribed Bodies	10 December 2025
3	Second Draft Statement of Common Ground with Prescribed Bodies (following correspondence with the Marine Management Organisation)	15 December 2025
4	Third Draft Statement of Common Ground with Prescribed Bodies (following correspondence with Tonbridge and Malling Borough Council)	16 December 2025
5	Fourth Draft Statement of Common Ground with Prescribed Bodies (following correspondence with Swale Borough Council)	16 December 2025
6	Fifth Draft Statement of Common Ground with Prescribed Bodies (following additional correspondence with Tonbridge and Malling Borough Council)	16 December 2025
7	Submission Statement of Common Ground with Prescribed Bodies (following additional correspondence with Tonbridge and Malling Borough Council)	17 December 2025

## Status of the Statement of Common Ground


This document presents a Statement of Common Ground (SoCG) between Medway Council and the following prescribed bodies:

- Gravesham Borough Council;
- Tonbridge and Malling Borough Council;
- Swale Borough Council;
- Kent County Council;
- Environment Agency;
- Natural England;
- Historic England;
- Sport England;
- Marine Management Organisation;
- NHS Kent and Medway; and
- NHS Property Services.

Sport England and the Marine Management Organisation have signed this SoCG by 17 December 2025. The other prescribed bodies are taking the document through their respective governance processes.

Maidstone Borough Council and National Highways requested separate SoCGs.

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Position	Portfolio Holder for Climate Change and Strategic Regeneration
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Position	
Strategic matters	Local housing need; Gypsy, Traveller and Travelling Showpeople; Employment land; Strategic sites; Green Belt; M2 Junction 1
Signature	

**On behalf of Tonbridge and Malling Borough Council**

Name	Councillor Mike Taylor
Position	Cabinet Member for Planning
Strategic matters	Local housing need; Gypsy, Traveller and Travelling Showpeople; Employment land; Strategic sites; Green Belt; A229 Blue Bell Hill
Signature	

**On behalf of Swale Borough Council**

Name	
Position	
Strategic matters	Local housing need; Gypsy, Traveller and Travelling Showpeople; Air quality (human health)
Signature	

**On behalf of Kent County Council**

Name	
Position	
Strategic matters	Strategic sites; Schools; Historic environment; M2 Junction 1; M2 Junction 4; A229 Blue Bell Hill; Air quality (human health); Minerals supply; Waste management
Signature	

**On behalf of the Environment Agency**

Name	
Position	
Strategic matters	Flood risk
Signature	


**On behalf of Natural England**

Name	Sean Hanna
Position	Senior Officer - Natural England Sussex and Kent Team
Strategic matters	Natural environment
Signature	

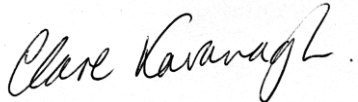
**On behalf of Historic England**

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Strategic matters	Historic environment
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**On behalf of Marine Management Organisation**

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**On behalf of NHS Kent and Medway**

Name	Simon Brooks-Sykes
Position	Deputy Director of Strategic Estate and Sustainability
Strategic matters	Community facilities
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**On behalf of NHS Property Services**

Name	Hyacynth Cabiles
Position	Town Planner
Strategic matters	Community facilities
Signature	

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# 1 Introduction

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## 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 The first version of this document (June 2025) presented an initial proposed composite SoCG with prescribed bodies. Subsequently, Maidstone Borough Council and National Highways requested separate statements of common ground.
- 1.1.3 This SoCG sets out the strategic context, strategic matters, governance arrangements and ongoing cooperation between Medway Council ('the Council' hereafter) and other prescribed bodies, as defined in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

## 1.2 Terminology

- 1.2.1 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.
- 1.2.2 This iteration of the SoCG presents matters as "Agreed", "Under discussion" or "Not agreed".

## 1.3 Strategic context of the Medway unitary authority area

- 1.3.1 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.
- 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 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

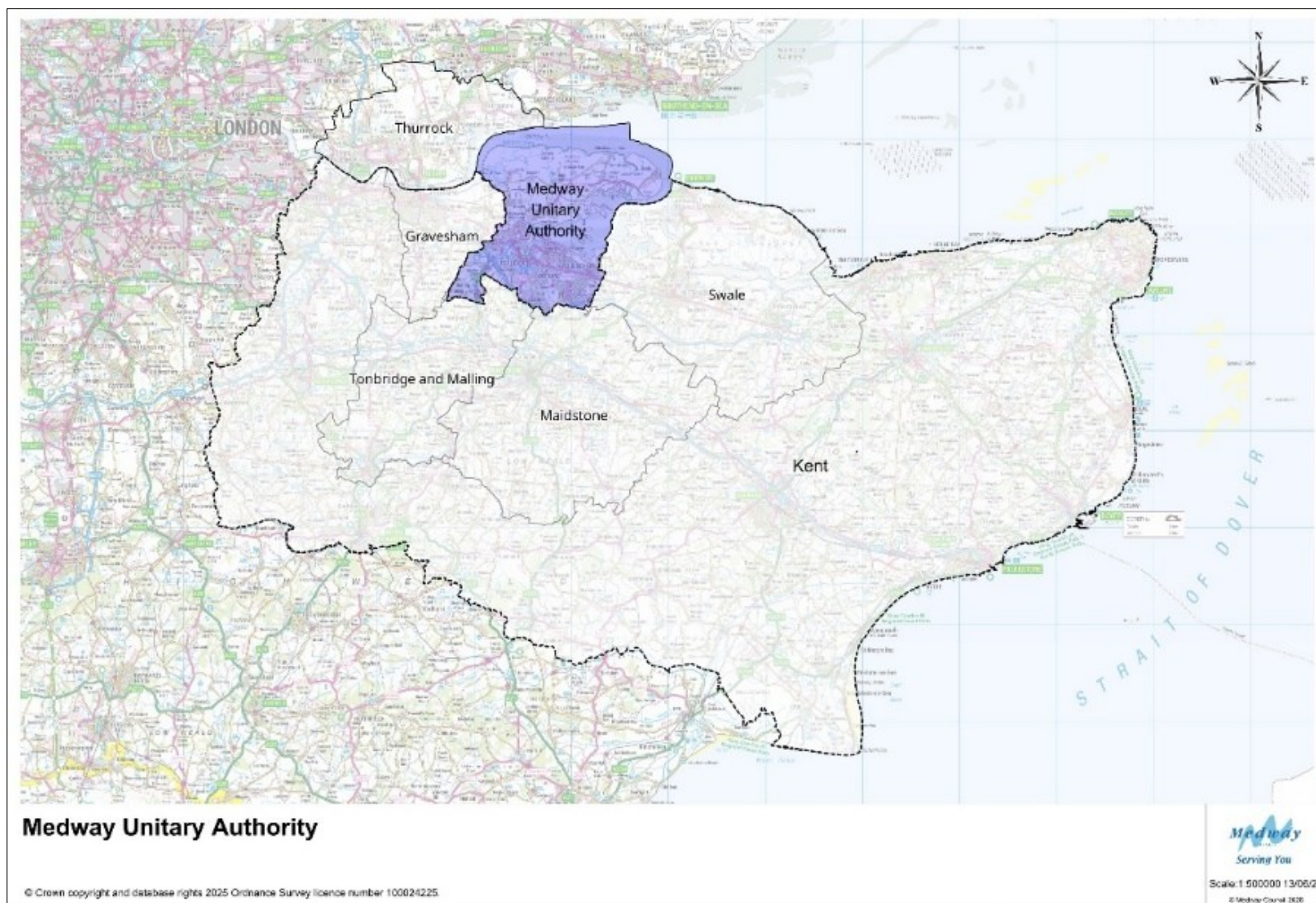


to accommodate Medway's development needs. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth.

- 1.3.3 The Council is the local planning, transport, minerals and waste authority for the unitary authority area.
- 1.3.4 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.
- 1.3.5 The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA).<sup>1</sup> 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.
- 1.3.6 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.
- 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:

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<sup>1</sup> 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**

## 2 Strategic Matters

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### 2.1 Local housing need

- 2.1.1 The National Planning Policy Framework expects strategic policy-making bodies to apply the standard method when assessing local housing need. This method calculates a minimum annual need by starting from the local housing stock baseline and then increasing it to account for local affordability pressures. The figure produced by the standard method represents an unconstrained estimate of homes needed to inform plan-making; it is a minimum housing need indicator, not a fixed housing requirement.
- 2.1.2 Medway's local housing need, derived from the Standard Method, is 1,636 per annum, as calculated in June 2025.
- 2.1.3 During Duty to Cooperate (DtC) meetings, planning officers from the Council and Swale Borough Council have consistently stated the intention to meet local housing need, subject to the evidence base emerging at the time.
- 2.1.4 As a key part of the evidence base, the Local Housing Needs Assessment (LHNA) disaggregated Medway's local housing need into the different types of housing the future population will need. The LHNA set out the affordable housing need. The affordable housing need figure is an unconstrained figure set in the current housing market situation. It is not a component of the overall housing need, but is entirely independent, calculated using a different approach and different data sources. The LHNA also set out the needs of specific groups of people, such as older people. The LHNA was published in June 2025, along with other evidence base work.
- 2.1.5 The housing requirement is the minimum number of homes a local plan aims to deliver during the plan period. After calculating local housing need, local planning authorities should then estimate how many new homes can be provided in their area, supported by evidence on land availability, development constraints and any other relevant factors. The Council's housing requirement is supply-led. In other words, the extent to which Medway can meet its need and potentially contribute towards unmet need arising elsewhere is guided by the Land Availability Assessment, the Sustainability Appraisal and the site selection process. Medway's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum.
- 2.1.6 Gravesham Borough Council previously maintained a longstanding request for the Council to accommodate an estimated unmet housing need of 2,000 homes through responses to consultations and during DtC meetings. The Council has not received an assessment of land availability from Gravesham Borough Council, therefore reasonable alternative growth options in the Sustainability Appraisal that included Gravesham's calculation of unmet housing need cannot be justified. Furthermore, the Sustainability Appraisal found that reasonable alternative growth options

without Gravesham's calculation of unmet housing need performed better overall. This matter is **agreed**. In response to the Council's Regulation 19 consultation, Gravesham Borough Council did not raise any objections under soundness or legal compliance.

- 2.1.7 On 14 October 2025, Tonbridge and Malling Borough Council wrote to Medway Council and other neighbouring local planning authorities in relation to the preparation of its Regulation 18 stage 2 Local Plan 2024-2042, requesting assistance with unmet need. Prior to this, Tonbridge and Malling Borough Council had not been able to confirm if it had any unmet needs and the scale of these.
- 2.1.8 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. Draft Local Plan site allocations 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.
- 2.1.9 The Council responded on 10 December and confirmed that it is unable to assist in meeting unmet housing needs. The reasons given for this included being at an advanced stage of plan preparation, Medway's already high level of development needs, including 1,636 homes per year, environmental and other constraints that would make accommodating further growth challenging.
- 2.1.10 Tonbridge and Malling Borough Council recognise the difficulties in Medway meeting any unmet housing need, given the timing of the request and constraints identified. This matter is therefore **agreed**; however, discussions will be ongoing regarding this matter as part of any future Local Plan review.
- 2.1.11 No other requests to accommodate unmet housing need have been received through responses to consultations or during DtC meetings with other local planning authorities. This matter is **agreed**.

## 2.2 Gypsy, Traveller and Travelling Showpeople

- 2.2.1 There have been recent planning applications for Gypsy and Traveller accommodation in Medway. 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 Council will explore the potential for more Gypsy and Traveller accommodation at Cuxton through intensification and/or expansion. The respective needs of Gypsy, Traveller and Travelling Showpeople are **agreed**.

## 2.3 Employment land

- 2.3.1 The 2025 ELNA identified the following minimum need for employment land:

- 204,000 sqm of industrial floorspace.
  - 36,500 sqm of office floorspace.
- 2.3.2 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.
- 2.3.3 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. In October 2025, Tonbridge and Malling Borough Council asked the Council if it could assist in meeting any unmet office floorspace E(g)i and industrial B2 and B8 needs. In responding the Council has indicated that it is unable to assist in meeting unmet employment needs due to a large pipeline of employment consents, a weak office market in Medway and the relatively late stage of plan-making at which these unmet needs became known.
- 2.3.4 Tonbridge and Malling Borough Council recognise the difficulties in Medway meeting any unmet employment need, given the timing of the request and constraints identified. This matter is therefore **agreed**; however discussions will be on going regarding this matter as part of any future Local Plan review.

## 2.4 Strategic sites

- 2.4.1 The Council and Gravesham Borough Council have cooperated on land to the west of Strood. 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 and employment land. It will also comprise two primary schools, expansion of an existing school in Medway, 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.
- 2.4.2 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, respecting the setting of the Kent Downs National Landscape, to be approved by the Council and Gravesham Borough Council. This matter is **agreed**.
- 2.4.3 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. 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 Council's new Local Plan. The promoter hosted site visits of representatives from both local planning authorities in 2024 and 2025. The 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. This matter is **agreed**.

- 2.4.4 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 & 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.
- 2.4.5 Tonbridge & Malling Borough Council is supportive of the change in policy approach for Innovation Park Medway, to support the delivery of the remaining undeveloped land. Following discussions, Tonbridge & 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. This matter is **agreed**, however discussions are ongoing as to the timing of LDO revocation.

## 2.5 Green Belt

- 2.5.1 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.
- 2.5.2 The Council has prepared a Green Belt Review and has identified most parcels of land to the west of Strood as Green 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.
- 2.5.3 Planning officers from the Council and Gravesham Borough Council have commissioned a landscape-led masterplan to inform strategic site allocation policies for respective local plans. Further work is required through engagement with developers and the finalisation of a landscape-led masterplan which will be the basis for determining planning applications.
- 2.5.4 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 the Council and Gravesham Borough Council. This matter is **agreed**.

## 2.6 Natural environment

- 2.6.1 Guidance from Natural England, the Environment Agency and the Kent Downs National Landscape Unit has helped to shape strategic, development management and site allocation policies.
- 2.6.2 Natural England has provided specific guidance in relation to the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). 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 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.
- 2.6.3 As part of the Interim 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.
- 2.6.4 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. The air quality modelling required an ecological interpretation in an Appropriate Assessment of the North Kent Marshes European sites and the North Downs Woodlands Special Area of Conservation (SAC).
- 2.6.5 The updated HRA found no exceedances at the North Kent Marshes European sites, therefore no further action is required. However, the updated HRA recommends a strategic approach to reduce impacts of increased traffic flows at the North Downs Woodlands SAC. This will require ongoing cooperation and further assessment (see section 4); therefore, this matter remains **under discussion**.
- 2.6.6 Natural England supports a strategic approach to securing the natural environment in the context of significant development on the Hoo Peninsula. Natural England and considers that this approach could provide effective mitigation. Natural England supports the Council in establishing a Hoo Peninsula strategic environmental programme and seeks the strengthening of policy to secure the funding and delivery of the programme and mitigation measures. Further details are set out in a topic paper. The Council will work with Natural England in agreeing the measures and implementation mechanisms for a strategic environmental programme. This matter remains **under discussion**.
- 2.6.7 In response to the Council's Regulation 18 consultation, the Marine Management Organisation (MMO) 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 in addition to a number of relevant South East Marine Plan policies that could be



signposted to within relevant Medway Local Plan 2041 strategic policies. In response to the Council's Regulation 19 consultation, the MMO reiterated the need to refer to relevant licensing requirements, the South East Marine Plan, the Marine and Coastal Access Act 2009 and the Marine Policy Statement. The Council recognises the need to include relevant signposting; this matter is **agreed** because it will be resolved through modifications to the plan.

## 2.7 Schools

- 2.7.1 A new secondary school of at least 6FE, which will be part-funded by the Lidsing Garden Community, is required early in the plan period. The need for the secondary school is generated by planned development at Lidsing and in the Capstone Valley area. 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.
- 2.7.2 At the time of writing, Medway Council is engaged in negotiations with the land owner of most site allocations in the Capstone Valley, F D Attwood & Partners, regarding this matter. Medway Council is cooperating with the neighbouring Local Education Authority, Kent County Council.
- 2.7.3 The delivery of a new secondary school, as cross border strategic infrastructure, remains a matter **under discussion**.
- 2.7.4 In addition to a primary school as part of the East Hill development, a new primary school, phased in the latter part of the plan period, is likely to be located within the Mill Fields site. A new primary school is proposed within the Lidsing Garden Community within the Maidstone borough.

## 2.8 Historic environment

- 2.8.1 The Council has a longstanding, positive working relationship with Historic England and Kent County Council in its role in providing a specialist heritage service to the Council. Historic England's and Kent County Council's guidance has helped to shape strategic, development management and site allocation policies.
- 2.8.2 In response to the Council's Regulation 19 consultation, Historic England welcomed policies for the historic environment but noted the absence of policies for Registered Parks and Gardens, Heritage at Risk and the Local List. Furthermore, Policy DM9 (Heritage Assets) does not differentiate between designated and non-designated heritage. Historic England's representations included suggested changes to several policies. The Council recognises the need for these changes; this matter is **agreed** because it could be resolved through modifications to the plan.
- 2.8.3 In response to the Council's Regulation 19 consultation, Kent County Council's representations included suggested changes to several policies. The Council recognises the need for these changes; this matter is **agreed** because it could be resolved through modifications to the plan.



## **2.9 Strategic Road Network – M2 Junction 1**

- 2.9.1 M2 Junction 1 is located to the west of Medway where the M2 merges with the A2 and the A289.
- 2.9.2 M2 Junction 1 emerged as a strategic planning matter following representations received from National Highways in determining the planning application for MedwayOne (former Kingsnorth Power Station).
- 2.9.3 National Highways reviewed the applicant's Transport Assessment and in response noted concerns about both safety and congestion at M2 Junction 1, specifically the northbound off-slip and the southbound on-slip links. Following an initial assessment, National Highways considered that the junction had limited spare capacity, i.e. 60 movements during the morning or evening peak travel period. The junction would need to be improved to accommodate further development once this spare capacity has been exceeded.
- 2.9.4 The Council, as the local planning authority, resolved to approve the application subject to a Section 106 agreement and Planning Condition 7. Condition 7 was proposed by the applicant and accepted by National Highways to facilitate an early consent, with all parties agreeing that a further round of more detailed and bespoke modelling work would commence post-consent.
- 2.9.5 Having reviewed subsequent technical work produced by the applicant, National Highways advised the Council that there would be no objection to the discharge of Condition 7 attached to the planning permission for MedwayOne. In other words, following a discharge of condition application, the trip cap no longer applies.
- 2.9.6 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.
- 2.9.7 Figure 2 shows the LTC's Order Limits (red line) which straddle the northbound off-slip and the southbound on-slip links (pink labels). The links are part of Kent County Council's highway network.

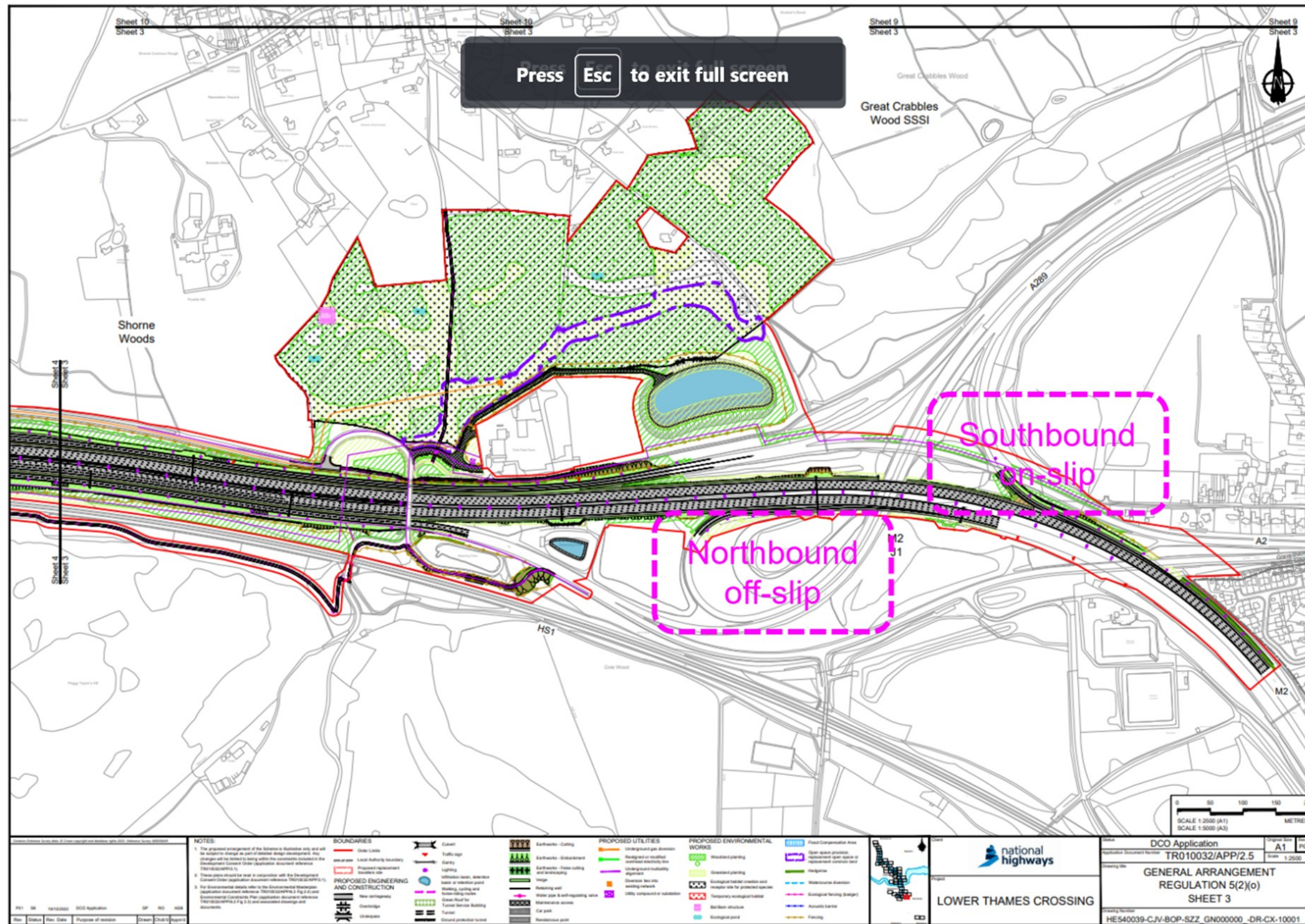


Figure 2: LTC Order Limits (With 'Northbound off-slip' and 'Southbound on-slip' annotation added)



- 2.9.8 Drawing on the Applicant's submission documents, the Council's Local Impact Report noted the increase in the traffic flows on the M2 Junction 4 to A2/A2018 Dartford town centre route. An assessment on behalf of the Council also identified an increase in traffic flows on the M2, with approximately 1,350 Passenger Car Units (PCUs) westbound and 800 PCUs eastbound in the AM peak in 2030. This would seemingly affect the capacity and safety of traffic to merge and diverge.
- 2.9.9 The Council's representations during the LTC Examination repeatedly highlighted this strategic planning matter.
- 2.9.10 As part of the STA, the M2 and M20 Merge and Diverge Assessment has identified the need to mitigate M2 Junction 1. Following the LTC's granting of development consent, traffic modelling scenarios as part of the STA assumed the LTC will be operational in 2041.
- 2.9.11 A third party (Stantec on behalf of Uniper) provided a design to the Council which shows a proposed layout for the M2 Junction 1 southbound merge. The Council appointed Jacobs 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.
- 2.9.12 The consultant found that the design would provide additional highway capacity for the merge; however, a list of departures from the relevant design standards were identified. The consultant recommended a more in-depth design to remove the majority of the departures. The consultant estimated a maximum cost of £12 million. However, due to the number of departures from standards, it is not possible to predict with any certainty if the cost would increase significantly. The potential requirement to alter a bridge structure is a key component of this uncertainty.
- 2.9.13 National Highways considered the consultant's reports. National Highways acknowledged the list of departures and required additional drawings (cross-section, merge layout, diverge layout and visibility). National Highways' stated position is that any further submissions must set out the justification for departures and any associated individual and cumulative implications for the safety, operation (including future maintenance) and reliability of the SRN. National Highways' caveated response considered the order of magnitude costs to be reasonable for this stage of design.
- 2.9.14 National Highways is currently undertaking discussions with relevant parties (including Kent County Council Highways and Gravesham Borough Council) concerning the potential commissioning of additional strategic and micro-simulation modelling to assess the performance of M2 Junction 1. M2 Junction 1 will require ongoing cooperation (see section 4), therefore this matter remains **under discussion**. In the meantime, an updated assessment of cumulative impacts at M2 Junction 1 will be informed by Gravesham Borough Council's emerging Local Plan Review.

## 2.10 Strategic Road Network – M2 Junction 4

- 2.10.1 A fourth arm of the grade separated roundabout forming part of M2 Junction 4 will be funded and delivered by the Lidsing Garden Community development in the Maidstone borough. A connection between North Dane Way and M2 Junction 4 will provide for an orbital bus route traversing both administrative areas.
- 2.10.2 Kent County Council's Regulation 19 representations queried the reliance of site allocations in the Capstone Valley on the Lidsing Garden Community to deliver the improvements to M2 Junction 4; for example, if the Lidsing Garden Community is not started or stalls ahead of the delivery of improvements to M2 Junction 4.
- 2.10.3 Kent County Council's representations noted that future development in the Capstone Valley depends on the Lidsing Garden Community coming forward. The Council will need to demonstrate how future development in the Capstone Valley could come forward if the Lidsing Garden Community, and the associated M2 Junction 4 scheme (fourth arm), does not come forward. The Council intends to commission a 'Monitor and Manage Mitigation Strategy' to address the evolving certainty of off-site highway mitigations and local impacts, including at Bredhurst and Boxley. The Council's consultants have identified an interim scheme and indicative costings; however, at the time of writing, Kent County Council has not had the opportunity to review the latest versions of the STA documents; therefore, this matter is **under discussion**.
- 2.10.4 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 Special Area of Conservation (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 Habitats Regulations Assessment for the Medway Local Plan, adverse air quality impacts at the North Downs Woodlands Special Area of Conservation (SAC) have been identified. A strategic approach to transport mitigation at the SAC is likely to reduce these impacts. This will require ongoing cooperation (see section 4); therefore, this matter remains **under discussion**.
- 2.10.5 According to work by Charles & Associates on behalf of F D Attwood & Partners, the existing M2 Junction 4 could accommodate up to 600 additional vehicle movements before the need for the new scheme. Analysis of a combined housing trajectory for both the Maidstone and Medway local planning authority areas indicates that the scheme is required early in the plan period.
- 2.10.6 Given that the area of the works is less than the Development Consent Order threshold of 15 hectares, it will be progressed under a funding agreement between the development promoter and National Highways under Section 278 of the Highways Act. The timeline for a Section 278

agreement involves several stages, from initial application to completion and maintenance, and can take several months to complete.

- 2.10.7 The Council has requested an update from Maidstone Borough Council and the applicant regarding the progress of the proposed scheme. The delivery of improvements to M2 Junction 4 remains a matter **under discussion**.

## 2.11 Major Road Network – A229 Blue Bell Hill

- 2.11.1 The A229 Blue Bell Hill connects Junction 6 of the M20 in Maidstone and Junction 3 of the M2 at Blue Bell Hill village. This section of road is a strategic link between the M20 and M2, and between Maidstone and Medway.
- 2.11.2 Kent County Council has submitted a bid to the Department for Transport's Major Road Network funding programme for 'Large Local Major Schemes' for the Blue Bell Hill Improvement Scheme. This programme was set up to cater for exceptionally large local transport schemes that could not be funded through normal routes.
- 2.11.3 The aim of the Scheme is to improve capacity, journey time reliability and road safety. The Scheme will accommodate an increase in traffic due to the Lower Thames Crossing and proposed local developments. The Scheme is still in an early phase of design. It therefore could not be regarded as a committed scheme for traffic modelling purposes during local plan-making, as it was deemed insufficiently certain to be coded into the Medway cordon of the Kent Strategic Model.
- 2.11.4 As part of the Strategic Transport Assessment, the 'M2 Junction Analysis Technical Note' highlights M2 Junction 3 and Lord Lees Roundabout (A229) as an existing problem in the 2019 base year and in the Reference Case, i.e. committed development as of 2041. The Technical Note refers to an updated analysis in the 'Junction Modelling and Mitigation Report', which found a deterioration of performance on the northbound approach from M2 Junction 3 to the M2 and on the A229 approach. Sites allocated in the Medway Local Plan 2041 would exacerbate the delays and capacity in this location.
- 2.11.5 The Scheme is estimated to cost £250 million. If the bid is successful, it will cover 85% of the cost of the Scheme, while the remaining 15% will need to come from developer contributions and other funding sources. The need for the Scheme is **agreed**; however, at the time of writing, the funding and delivery mechanisms were unknown. Discussions were ongoing between local authorities, including Kent County Council, regarding further traffic modelling and funding options to support delivery.
- 2.11.6 In response to the Council's Regulation 19 consultation, Tonbridge and Malling Borough Council noted that the scheme was not included in the Council's Infrastructure Delivery Schedule. Meanwhile, National Highways required a more detailed analysis of cumulative impacts at M2 Junction 3, accounting for the removal of queues associated with the mitigation scheme for M2 Junction 4, along with the possible need to undertake a sensitivity test depending on the progress of Kent County Council's

emerging business case for the Blue Bell Improvement Scheme. A more detailed analysis has been set out in the latest (submission) version of the STA, which has informed an update to the Council's Infrastructure Delivery Schedule; proportionate, viable developer contributions towards the Scheme will be sought. Until the funding and delivery mechanisms are confirmed this matter will remain as **under discussion**.

## 2.12 Air quality (human health)

- 2.12.1 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.
- 2.12.2 As part of the Strategic Transport Assessment, 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.

## 2.13 Flood risk

- 2.13.1 The Council published a Strategic Flood Risk Assessment (May 2025) (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 to support the Regulation 19 consultation.
- 2.13.2 In response to the Council's Regulation 19 consultation, the Environment Agency raised concerns about:
  - the model used as the basis for the 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.
- 2.13.3 The SFRA that was published to support the Council's Regulation 19 consultation was not based on the latest flood risk information from the North Kent Coast Flood Domain 2 Model, and this would render the Sequential Test and the Exception Test outdated. However, the North Kent Coast Flood Domain 2 Model was unavailable when the Council's consultant produced the SFRA. The Council's consultant subsequently 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. In addition, following engagement with the Environment Agency, the Council's planning officers have produced a Flood Risk Topic Paper. The topic paper illustrates how site allocation boundaries, often derived from land promoters in the early plan-making process, do not reflect the site-specific

areas to be developed, which reduces the development area subject to high flood risk. This matter is **under discussion**.

- 2.13.4 The Council has produced a 'Site Selection Topic Paper' as a Regulation 22 Submission document. This document has been shared with Environment Agency. This matter is **under discussion**.
- 2.13.5 The Council recognises the Environment Agency's concerns about the need to identify necessary flood defences and their associated funding and delivery. 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; it is **under discussion**.
- 2.13.6 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.
- 2.13.7 The Environment Agency's representations included suggested changes to policies, including the criteria and subsequent design principles within site allocation policies. The Council recognises the need for most of these changes; this matter is **agreed** because it could be resolved through modifications to the plan.

## 2.14 Community facilities

- 2.14.1 The Playing Pitch Strategy (PPS) is based on an audit and assessment of the supply and demand for existing and future playing pitches, in consultation with local clubs, national governing bodies of sport and other users and providers. The PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. The associated Sports Facility Strategy and Action Plan provide an assessment of need up to 2035 and a phased approach to planning. It sets out opportunities for improvements in a range of sports facilities across Medway. The PPS was finalised in October 2019 and covered the period 2018 to 2035.
- 2.14.2 In response to the Council's Regulation 19 consultation, Sport England noted that a Playing Pitch Strategy and a Built Facilities Plan is to be commissioned in January 2026 and completed in June 2026. The methodology will follow the latest Sport England guidance. Sport England's representations suggest the latest evidence base could require changes to policies. The Council recognises the potential need for changes to policies; this matter is **agreed** because it could be resolved through modifications to the plan.
- 2.14.3 The NHS Kent and Medway's response to the Council's Regulation 19 consultations noted:
- The NHS Kent and Medway's Developer Contribution Guide (2025) should be reflected in the Council's Developer Contributions Guide

- The need for a new primary and community healthcare facility to meet future demands in the 'River Waterfront' area at no cost to the NHS.
  - 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. Despite being promoted for redevelopment by NHS Property Services, the availability of the site allocation SNF20 is not confirmed.
  - The need to identify opportunities for a future healthcare facility in the Capstone Valley, taking account of the Lidsing Garden Community. Meanwhile, a GP surgery should be removed from site allocation LW6.
  - A 'health hub' should be removed from site allocation RN9; while the existing Rainham Healthy Living Centre could be reconfigured and maximised with existing development contributions.
  - The need to 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.
- 2.14.4 In response to the Council's Regulation 19 consultation, NHS Property Services' representations included suggested changes to several policies. The Council recognises the need for these changes; this matter is **agreed** because it could be resolved through modifications to the plan.
- 2.14.5 There will be ongoing, long-term collaboration between the Council, NHS Kent and Medway and NHS Property Services; such matters are **under discussion**. This will include the continuing cross border liaison with Maidstone Borough Council in planning for the health care facilities for new communities in the Capstone Valley and the adjacent Lidsing Garden Community.

## 2.15 Minerals supply

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

## 2.16 Waste management

- 2.16.1 An initial proposed Statement of Common Ground with Thurrock Council is presented in a separate document. 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.
- 2.16.2 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**

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### **3.1 Duty to Cooperate**

- 3.1.1 The Duty to Cooperate places a legal duty on local planning authorities and county councils in England, and prescribed bodies, to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans.
- 3.1.2 The Council's Duty to Cooperate Statement sets out strategic planning matters subject to ongoing cooperation. However, the Council's Strategic Infrastructure Planning and Implementation Group may identify other strategic planning matters that would require ongoing cooperation with prescribed bodies.

### **3.2 Main points of contact**

- 3.2.1 The respective local plan-making teams will continue to act as the main points of contact between neighbouring local planning authorities.
- 3.2.2 The signatories of this SoCG will continue to act as the main points of contact for the other prescribed bodies.

## 4 Timetable and Ongoing Cooperation

### 4.1 Timetable

4.1.1 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	December 2025
Gravesham	Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014)  Saved policies from Gravesham Local	2018	April 2018  October 2020	July 2025	December 2025

	Plan First Review (1994)				
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				
Maidstone	Maidstone Borough Local Plan Review 2021-38 (2024)	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
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				
Tonbridge and Malling	Core Strategy (2007)	July 2021 plan making recommended following withdrawal of previous draft	Reg 18 stage 1 October to November 2022	Q2 2026/27	Q3 2026/27 (by 31 December 2026)
	Development Land Allocations DPD (2008)	Local Plan from Examination	Reg 18 stage 2 November 2025 to January 2026		
	Tonbridge Central Area Action Plan (2008)				
	Managing Development and the Environment DPD (2010)				
	Saved policies from Tonbridge and Malling Borough Local Plan (2008)				
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				

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

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## 4.2 Ongoing Cooperation

- 4.2.1 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.
- 4.2.2 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 engage in consultation with Maidstone Borough Council on the preparation of the Lidsing Garden Community SPD and associated planning applications.
- 4.2.3 The Council will work with Kent County Council to deliver a new secondary school at Abbotts Court Farm.
- 4.2.4 The Council will consult Tonbridge and Malling Borough Council on the anticipated planning application for mixed-use development comprising commercial uses (office and research), a care home and retirement units at Innovation Park Medway. The timing of LDO revocation will also be agreed alongside the progression of respective local plans.
- 4.2.5 The Habitats Regulations Assessment for the Medway Local Plan recommends a strategic mitigation approach to ensure effective and coordinated reduction of air quality impacts at the North Downs Woodlands SAC.
- 4.2.6 Paragraph 6.89 of the Maidstone Local Plan Review sets out the requirements of a planning application, an associated project-level Habitats Regulations Assessment and a Mitigation Strategy. Paragraph 6.90 of the Maidstone Local Plan Review sets out a package of eleven potential mitigation measures, which should not be taken as exhaustive in preparing a planning application.
- 4.2.7 The Council and Maidstone Borough Council will be engaged in ongoing cooperation to determine a strategic mitigation approach to be agreed with Natural England and the relevant highway authorities.
- 4.2.8 The Council's planning officers will continue to work with Historic England and Kent County Council in preparing an update to the Heritage Strategy.
- 4.2.9 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.
- 4.2.10 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, allowing for a realistic build-out rate at the contributing development sites and associated background traffic growth.

- Produce an initial feasibility assessment for an improvement scheme.
  - Develop an improvement scheme, along with an assessment of timing, feasibility and funding.
  - Determine how proportionate developer contributions could be collected.
- 4.2.11 For M2 Junction 3, the Council will collaborate with National Highways and Kent County Council on the following sequential tasks:
- Definition of the scope of work for the required cumulative impact and sensitivity tests of M2 Junction 3 and Lord Lees, following review of the proposals in the updated STA by National Highways.
  - Undertaking of the required cumulative impact and sensitivity tests and review of the outputs and conclusions.
  - If required, determine what mitigation measures specific to the Medway Local Plan will be required in the event that the Blue Bell Hill Improvement Scheme does not progress to an acceptable level of certainty regarding funding and delivery.
- 4.2.12 For M2 Junction 4, Medway Council will collaborate with National Highways, Kent County Council and Maidstone Borough Council on the following sequential tasks:
- Review of the additional technical information relating to the M2 Junction 4 proposals specific to the Medway Local Plan.
  - Preparation of any additional supporting information which may be identified as a result of this review.
  - Preparation of a monitor and manage strategy to address uncertainties around the timing and delivery of wider off-site mitigation measures, particularly those affecting the communities of Bredgar and Boxley.
- 4.2.13 The Council will continue to cooperate with local authorities to support the delivery of the Blue Bell Hill Improvement Scheme, which is being led by Kent County Council.
- 4.2.14 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.
- 4.2.15 The Council recognises the Environment Agency's concerns about the need to identify necessary flood defences and their associated funding and delivery. 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.
- 4.2.16 The Council will continue to liaise with Sport England to commission an updated PPS and a Built Facilities Plan.
- 4.2.17 The Council will continue to liaise with NHS Kent and Medway, including the Integrated Care Board, in planning for new and expanded healthcare infrastructure in Medway. Regular meetings between the Council's Planning and Public Health teams and NHS partners have informed the updates to the Infrastructure Delivery Plan and cross border discussions

in planning for strategic sites. Health partners will be invited to relevant meetings of the Council's Strategic Infrastructure Planning and Delivery Group.