

# **Statement of Common Ground with National Highways**

## **Submission Document**

Medway Council

Regulation 22  
December 2025

## Versions


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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 National Highways	5 December 2025
3	Second Draft Statement of Common Ground with National Highways	16 December 2025
4	Submission Statement of Common Ground with National Highways	17 December 2025


## Status of the Statement of Common Ground

This document presents a Statement of Common Ground (SoCG) between Medway Council and National Highways.

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Position	Portfolio Holder for Climate Change and Strategic Regeneration
Signature	
Date	17 December 2025

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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 strategic bodies. Subsequently, National Highways requested a separate SoCG with Medway Council.
- 1.1.3 This SoCG will set out the strategic context, strategic matters, governance arrangements and ongoing cooperation between National Highways and Medway Council.

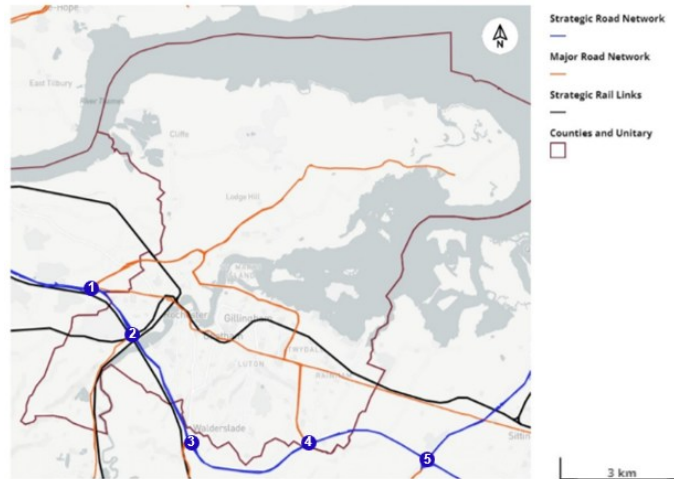
## 1.2 Terminology

- 1.2.1 The initial proposed composite SoCG with strategic 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” or “Under discussion”. A SoCG can include “Not agreed” matters, but there are none which apply to this document.

## 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 and national 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.

- 1.3.3 Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, in particular the Lower Thames Crossing (LTC). The LTC is a planned road crossing under the Thames estuary that will link Kent and Essex.
- 1.3.4 Medway Council is the local planning, transport, minerals and waste authority for the unitary authority area.
- 1.3.5 Figure 1 shows the locations of M2 junctions 2, 3, 4 and 5.



**Figure 1: Strategic Road Network and the Medway administrative area**

- 1.3.6 M2 junctions 2 and 4 are within the Medway administrative boundary. M2 junctions 1 and 5, along with M20 junctions 4, 5 and 6 are the next major SRN junctions from the Medway administrative boundary. For the avoidance of doubt, the A2 within Medway is a local road, the A2 that runs westwards from M2 Junction 1 forms part of the SRN.

## 1.4 Engagement with National Highways

- 1.4.1 National Highways has been appointed by the Secretary of State for Transport as a strategic highways company under the provisions of the Infrastructure Act 2015. In accordance with the company's licence issued by the Secretary of State, it is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN) in England.
- 1.4.2 The SRN is a critical national asset and, as such, National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity.
- 1.4.3 The policy of the Secretary of State for Transport in relation to the SRN is Circular 1/2022, 'Strategic road network and the delivery of sustainable development'. Circular 1/2022 sets out general principles for engagement in local plan-making.
- 1.4.4 National Highways and Medway Council have engaged from the outset of the local plan-making process to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The engagement complies with the requirements set out in

the National Planning Policy Framework (NPPF) with regards “strategic matters” and those under the Duty to Cooperate Further information is available in the Duty to Cooperate Statement.

## 2 Strategic Matters

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### 2.1 Evidence base

- 2.1.1 The Strategic Transport Assessment (STA) has informed the preparation of the new Local Plan. The STA has been tailored to meet the requirements of National Highways and the neighbouring local transport authority, Kent County Council, to demonstrate a series of agreed scenarios in terms of traffic generation. The STA involved iterative assessments of cumulative impacts associated with committed development and future development up to 2041. The STA has identified in principle what mitigations will be required for the SRN, and their current estimated timings for implementation based on the development phasing assumptions set out in the submission Local Plan and the associated Infrastructure Delivery Plan (IDP).
- 2.1.2 The STA comprises the following documents:
- Data Collection Report;
  - Local Model Validation Report;
  - Forecasting Methodology Technical Note;
  - Junction Modelling and Mitigation Report;
  - Proportionality Assessment;
  - M2 Junction Analysis Technical Note;
  - M2 and M20 Merge and Diverge Assessment;
  - Mode Share Strategy;
  - Mode Shares and Trip Rate Assessment Tool;
  - Forecasting Report (2024); and
  - Forecasting Report (2025).
- 2.1.3 National Highways provided comments on draft STA documents, and these comments were taken into account prior to finalising STA documents. 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**.

### 2.2 M2 Junction 1

- 2.2.1 M2 Junction 1 is located to the west of Medway where the M2 merges with the A2 and the A289.
- 2.2.2 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).
- 2.2.3 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.

- 2.2.4 Medway 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.
- 2.2.5 Having reviewed subsequent technical work produced by the applicant, National Highways advised Medway 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.
- 2.2.6 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.
- 2.2.7 Figure 2 shows the LTC's Order Limits (red line) which straddle the northbound off-slip and the southbound on-slip links (pink labels).

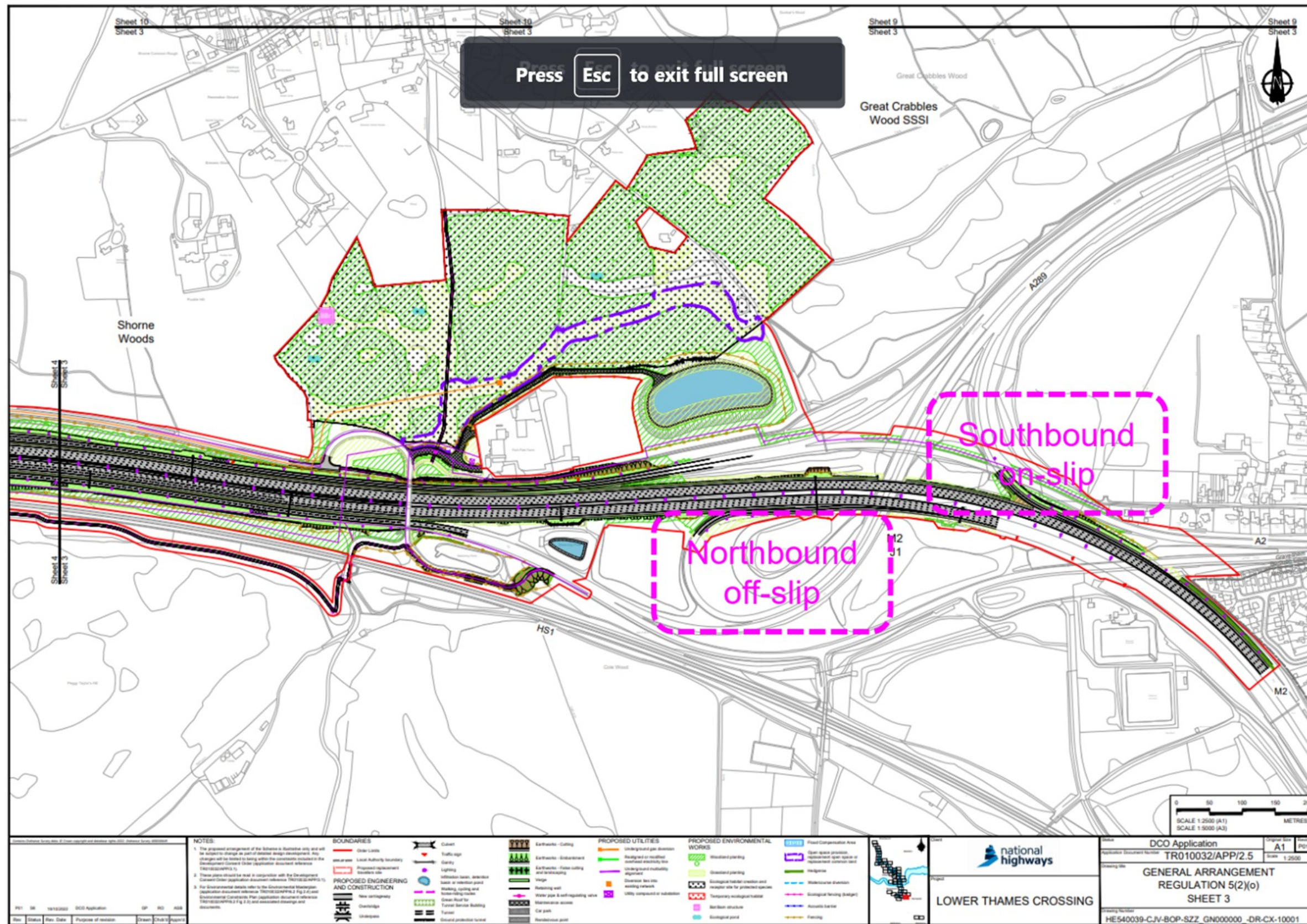


Figure 2: LTC Order Limits (With 'Northbound off-slip' and 'Southbound on-slip' annotation added)



- 2.2.8 Drawing on the Applicant's submission documents, Medway 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 Medway 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.
- 2.2.9 Medway Council's representations during the LTC Examination repeatedly highlighted this strategic planning matter.
- 2.2.10 As part of the STA, the M2 and M20 Merge and Diverge Assessment has identified the need to mitigate M2 Junction 1 as a result of the impacts associated with planned Local Plan allocation sites. Following the LTC's granting of development consent, traffic modelling scenarios as part of the STA assumed the LTC will be operational in 2041.
- 2.2.11 A third party (Stantec on behalf of Uniper) provided a design to Medway Council which shows a proposed layout for the M2 Junction 1 southbound merge. Medway 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.
- 2.2.12 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.
- 2.2.13 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.
- 2.2.14 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.

## 2.3 M2 Junction 2

- 2.3.1 Neither the M2 Junction Analysis Technical Note nor the M2 and M20 Merge and Diverge Assessment identified the need for mitigation at M2 Junction 2. This matter is **agreed**.

## 2.4 M2 Junction 3

- 2.4.1 The Maidstone Borough Local Plan Review, adopted in March 2024, included a mitigation scheme for M2 Junction 3 and this was coded into the Medway cordon of the Kent Strategic Model as a committed scheme. This mitigation scheme was included in both the Reference Case and Do Something future scenarios.
- 2.4.2 Kent County Council has submitted a bid to the Department for Transport's Major Road Network funding programme for 'Large Local Major Schemes'. This programme was set up to cater for exceptionally large local transport schemes that could not be funded through normal routes.
- 2.4.3 The aim of the scheme is to improve journey time reliability and road safety. The scheme will accommodate an increase in traffic due to the Lower Thames Crossing and proposed local developments.
- 2.4.4 The scheme is still in an early phase of design. It could not be regarded as a committed scheme; it was deemed insufficiently certain to be coded into the Medway cordon of the Kent Strategic Model.
- 2.4.5 As part of the STA, 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 referred to a more detailed analysis in the 'Junction Modelling and Mitigation Report', which noted 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.
- 2.4.6 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 government funding opportunities. At the time of writing, the funding and delivery mechanisms are unknown.
- 2.4.7 Following updates to the evidence base, Medway Council's Infrastructure Delivery Schedule notes proportionate, viable developer contributions towards the Blue Bell Hill Improvement Scheme.
- 2.4.8 In response to Medway Council's Regulation 19 consultation, 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)

versions of the STA documents. At the time of writing, National Highways has not had the opportunity to review the latest versions of the STA documents; therefore, this matter is **under discussion**.

## 2.5 M2 Junction 4

- 2.5.1 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.
- 2.5.2 Maidstone Borough Council's representations noted that Medway Council's pre-submission draft plan (Regulation 19) Policies Map should safeguard land for improvements to M2 junction 4 and the North Dane Way access. This matter is **agreed**; it will be resolved through modifications to the plan.
- 2.5.3 National Highways' and 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.
- 2.5.4 National Highways' and Kent County Council's representations noted that future development in the Capstone Valley depends on the Lidsing Garden Community coming forward. Medway 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.
- 2.5.5 Medway Council's consultants have identified an interim scheme and indicative costings; however, at the time of writing, National Highways has not had the opportunity to review the latest versions of the STA documents and has requested additional information on the supporting evidence, including highway modelling; therefore, this matter is **under discussion**.
- 2.5.6 Medway Council also 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. National Highways will work with the appointed consultants to assist in developing this strategy, drawing on recent experience with other authorities and large development schemes; therefore, this matter is **under discussion**.
- 2.5.7 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 with Natural England and Maidstone Borough Council (see section 4), therefore this matter remains **under discussion**.

- 2.5.8 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 indicates that the scheme is required early in the plan period.
- 2.5.9 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.
- 2.5.10 Medway 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**.

## 2.6 M2 Junction 5

- 2.6.1 M2 junction 5 improvements were completed in 2025.
- 2.6.2 Neither the M2 Junction Analysis Technical Note nor the M2 and M20 Merge and Diverge Assessment identified the need for mitigation at M2 Junction 5. This matter is **agreed**.

## 2.7 Site-specific matters

- 2.7.1 The Reference Case future scenario comprises committed developments and any associated highway mitigations. Table 3-3 of the Forecasting Methodology Technical Note includes Innovation Park Medway (IPM), which was subject to a Local Development Order, which included a Monitor & Manage Mitigation Strategy. IPM, comprising 100,648 sqm of commercial floorspace, was included in the Reference Case, along with 'Priority junction access from unnamed road between Rochester Airport and Innovation Centre'. The new road runs parallel to an existing road that leads to Matt Robbins Microlight Instruction.'
- 2.7.2 However, Medway Council has since decided to pursue an alternative development at IPM, including an 80-bed care home and nine bungalows on the southern site. The planning application is anticipated in mid-2026.
- 2.7.3 National Highways has suggested the need for a sensitivity test. The alternative development at IPM is likely to generate fewer trips, although the distribution of trips would be different. Given the emerging status of the alternative development at IPM, it is **agreed** that this is a matter for the anticipated planning application.

- 2.7.4 National Highways has recommended Medway Council's planning officers liaise with counterparts at Dover District Council, given their recent experience in adopting a best practice approach with regard to pooling developer contributions for off-site highway mitigations.

## 2.8 Other matters

- 2.8.1 National Highways' representations to the Regulation 19 consultation included a number of observations and requests for clarification or amendment to specific policies included in the draft Local Plan document. These are summarised as follows:

- **Vision for Medway in 2041**

The transport elements of the over-arching Vision for Medway are considered to be consistent with the requirements of NPPF (December 2024) and Department for Transport Circular 01/2022, in that they seek to reduce reliance on the private car, improve access to active and sustainable modes of travel, and strengthen connectivity between the different parts of the borough. This wording should also extend to adjacent boroughs / authority areas which would increase the alignment with the Circular.

- **Strategic Objectives**

The strategic objective "Prepared for a Sustainable and Green Future" provides detail in relation to the main Vision and also refers to the climate emergency. However, the current wording does not make clear how successful delivery of this objective will be measured; this should be clarified in order to meet the test of Effectiveness in regard to soundness.

- **Monitor and Manage / Policy DM15**

The Local Plan presents a summary of how a Monitor and Manage approach is intended to help deliver the Vision. This includes reference to the use of appropriate instruments (including Grampian conditions, if needed) to secure both transport mitigations and the strategy to manage these during the construction of extended sites (this wording reflects discussions and advice provided by National Highways during earlier stages of the Regulation 19 preparation process).

Policy DM15 states that development proposals for sites of 50 or more houses or 5,000 sqm or more floorspace will be required to demonstrate how their trip generation will be lower than that assumed as "trip credits" in the Infrastructure Development Plan (IDP). In order for this requirement to be in accordance with the principles of Vision and Validate, the policy wording should make reference to the identification of transport measures or infrastructure as the means to deliver the reduced trip generation figures.

The associated explanatory text references the need for assessment of transport impacts to move away from "worst case"

scenarios. Reference should be made to the measures which will deliver changes to trip demands and mode shares, as this is necessary in order for the justification and effectiveness tests of soundness to be met.

It is considered that the reference to a “proportionate developer contribution discount” is premature and could undermine the ability of the Council to collect appropriate funding from developers for necessary transport improvements.

- **Policies T25 and T26**

Policy T25 requires the application of a sustainable-led transport hierarchy to street design for new developments.

Policy T26 sets out accessibility standards for different modes for different types of existing and proposed local services. Whilst this is primarily relevant to internalisation and local trips it establishes the need for credible provision for modes other than the car to be demonstrated by masterplans and site applications and can also be applied to longer distance trips in principle. It is recommended that Policy T26 includes reference in its bus standards to routes which connect to relevant major external destinations, including railheads and nearby towns.

- **Policy S24: Infrastructure Delivery**

Policy S24 sets out the Council’s expectations with regard to the provision of supporting infrastructure for development. This section refers to the payment of contributions toward off-site works to support development, which is assumed to include highway works.

The wording of Policy S24, or the supporting text, should include the statement that National Highways will not accept contributions toward works on the SRN and will not act as a “delivery partner”. Required works will need to be delivered either by the relevant developer or by the Local Authority (who may choose to collect contributions themselves to facilitate this).

- **Site Allocations**

The Plan sets out the policies relating to the various specific Local Plan site allocations throughout the Medway region. These policies primarily address “on site” requirements for each proposed allocation; as such these policies largely do not identify specific off-site issues which will need to be addressed. This is not considered to be an issue provided that Policy DM15 is applied robustly in all cases.

It is however noted that Site Policy SA7: Capstone Valley refers to the connection between North Dane Way and the M2 J4 which will provide for an orbital bus route to serve the sites within the development. Capstone Valley lies in close proximity to the major allocated site at Lidsing Garden Village in Maidstone and this policy should be clear on the need for co-ordination with that development, particularly with regard to the proposed upgrade to



M2 J4 which Lidsing is expected to deliver during the lifetime of the emerging Medway Local Plan.

Site Policy SA8: Hoo Peninsula lists four off-site junction improvements which the developers will be required to contribute to. This list excludes the identified required upgrade to the M2 Junction 1 eastbound merge; as this site is a major contributor to Local Plan traffic at this location, this improvement should be included in the list.

Any other site allocations which are located in proximity to M2 Junction 1 should also include this improvement as one which developers will be required to contribute to.

- 2.8.2 National Highways has not currently had the opportunity to review the submission version of the plan in regards to how these requested amendments have been addressed. Therefore, this matter is **under discussion**. However, it is anticipated that any further amendments to the policies which may be necessary can be addressed via the main modifications process.

## **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 public bodies, to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans.
- 3.1.2 Medway Council's Duty to Cooperate Statement sets out strategic planning matters subject to ongoing cooperation. However, Medway Council's Strategic Infrastructure Planning and Implementation Group may identify other strategic planning matters that would require ongoing cooperation with National Highways.

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

- 3.2.1 The Spatial Planning Team (South East Region Operations Directorate) has acted as the main point of contact at National Highways.
- 3.2.2 The local plan-making team has acted as the main points of contact at Medway Council.

## 4 Ongoing Cooperation

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### 4.1 Ongoing cooperation

- 4.1.1 National Highways has been a key party in the production of the documents included as part of the Local Plan evidence base and direct liaison and feedback has been sought throughout their production. This has allowed any matters of clarification to be sought, and resolutions agreed so that a mutually agreeable way forward can be achieved.
- 4.1.2 The parties intend to continue collaborative working concerning any further work in the interests of ensuring the most appropriate outcomes in respect of the SRN and the strategic growth proposed in the Local Plan.
- 4.1.3 To facilitate this process, monthly meetings will continue to be held between representatives of the National Highways Spatial Planning Team, Medway Council's planning officers 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.
- 4.1.4 Medway Council is engaged with National Highways' LTC team through their regular Traffic Management Forum and Travel Plan Liaison Groups.
- 4.1.5 Medway Council is also engaged with National Highways and Skanska (appointed by National Highways as the contractor for their Kent Roads contract) on documents requiring statutory consultation through the LTC Development Consent Order process.
- 4.1.6 For M2 Junction 1, Medway 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; and
  - determine how proportionate developer contributions could be collected.
- 4.1.7 For M2 Junction 3, Medway 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; and

- If required, determine what mitigation measures specific to the Medway Local Plan will be required in the event that the Kent County Council improvement scheme does not progress to an acceptable level of certainty regarding funding and delivery.
- 4.1.8 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; and
  - 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.
- 4.1.9 National Highways and Medway Borough Council are confident that the remaining tasks set out above are appropriate to resolve the identified remaining technical matters and that the associated work can be completed in advance of the Examination in Public hearings process commencing.
- 4.1.10 The Habitats Regulations Assessment for the Medway Local Plan recommends a strategic mitigation approach jointly delivered by Medway Council and Maidstone Borough Council to ensure effective and coordinated reduction of air quality impacts at the North Downs Woodlands SAC. National Highways will be consulted if this work has any bearing on the SRN.