

## Introduction and purpose

### Purpose

This Statement of Common Ground (SoCG) is a jointly agreed statement between Medway Council and Southern Water to support the progression of the Medway Local Plan 2041 and the associated Infrastructure Delivery Plan (IDP). It sets out both parties' position and areas of high-level strategic agreement regarding water supply, wastewater management, and sustainable drainage infrastructure required to support sustainable growth across the district.

This SCG has been prepared in accordance with paragraph 27 of the [National Planning Policy Framework \(NPPF\) \(2024\)](#) and the section of the government's [Guidance on Maintaining Effective Cooperation](#).

### The role of Medway Council

Medway Council is the local planning, transport, minerals and waste authority for the unitary authority area.. The Council is also responsible for preparing, updating, and maintaining the IDP to ensure that planned housing and economic growth are aligned with the timely delivery of necessary infrastructure. In exercising its plan-making and decision-taking functions, Medway Council coordinates with infrastructure providers to ensure that its Plans and development proposals are environmentally sustainable, safeguard the utility network, and incorporate robust measures for climate resilience.

### The role of Southern Water

Southern Water is the statutory water supplier and wastewater undertaker for the Medway Council district. Under [Regulation 2](#) of the Town and Country Planning (Local Planning) (England) Regulations 2012, Southern Water is a specific consultation body in relation to Local Plans.

As a water company, Southern Water is under a statutory duty to invest in infrastructure suitable to meet the demands of projected population growth. Southern Water is not a statutory consultee on planning applications. Where consulted, they assess, on a case-by-case basis, the capacity of the local



networks and comment where reinforcement of the system may be required to ensure there is no unacceptable reduction in the level of service as a consequence of growth.

## **Matters of agreement**

### **Proposed growth in the emerging Local Plan**

Southern Water has a statutory duty to serve growth and acknowledges the proposed level of growth within the Medway Local Plan 2041. Medway Council's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum, or 26,176 to 2041., The 2025 Employment Land Needs Assessment identified the need to accommodate a minimum of 204,000 of industrial floorspace and 36,500 sqm of office floorspace.

Southern Water feedback at Local Plan consultation stages indicates where phasing of occupation of new development may be needed in line with delivery of infrastructure, but raises no broader objection on grounds of infrastructure capacity to supply potable water within its area of operation. Where consulted, Southern Water will provide further information per development proposal at planning application stage when modelling work is repeated in more detail.

Whilst Southern Water identified some capacity constraints on a number of proposed site allocations, both parties agree that local infrastructure capacity constraints do not represent absolute or permanent barriers to development. Provided that appropriate engineering solutions, technological enhancements, and robust development phasing are enforced, planned growth can be accommodated while aligning with operational capacities, protecting the environment from deterioration, and safeguarding the structural integrity of the utility infrastructure.

To manage local network constraints and prevent adverse environmental impacts, both parties agree that capacity assessment must be a dynamic, ongoing process. This includes initial capacity assessment for proposed development at local plan stage with re-assessment during the planning application stage. Where site-specific deficits are identified, Southern Water will endeavour to plan and deliver the necessary local upgrades in close collaboration with Medway Council and developers; the process typically follows these sequential stages:

1. Planning applications are submitted by developers to the LPA, and Southern Water is consulted (not statutory) – at this point we undertake detailed modelling.
2. Where this modelling re-confirms that reinforcement of the network is needed, developments are conditioned by the LPA – typically conditions state ‘no occupation until capacity is available’ but there may be a level of occupation that could be accommodated directly.
3. Developer provides build out rates.
4. Asset strategy review options for network upgrades to provide capacity in the network.
5. Development starts.
6. Developer applies to connect.
7. Occupation once capacity is available.

In addition, it is agreed that Southern Water will continue to monitor growth data that is collated from different sources to include - adopted local plans, 5-year housing land supply trajectories and individual consultation on planning applications. This data feeds into the various planning processes we use to identify the most appropriate strategic and/or local upgrades.

#### Evidence base and sharing of data

It is agreed that Southern Water’s current Asset Management Period 8 (AMP8) business plan for 2025–2030 and Clean Rivers and Seas Plan represent the most up-to-date investment information available at this point in time. This AMP8 data reflects the agreed investment plans for the district, and therefore formally supersedes the historical contents of the 2023 Drainage and Wastewater Management Plan (DWMP) that fed into Southern Water’s business plan for AMP8.

To support Southern Water’s forward planning and the formulation of its upcoming AMP9 investment strategy, Medway Council has been invited to DWMP engagement sessions. Both parties also recognise that new growth data linked to evolving local plans can only be formally accounted for in future five-year water industry investment cycles once the growth proposals are accepted as part of an adopted Local Plan. To support effective investment planning:

- Southern Water continues to assess strategic assets for capacity to serve forecast growth using both Local Plan information and census/ONS data provided through a third-party population analysis. This feeds into both our ‘in AMP’ and longer term 5-yearly planning processes.



- Medway Council will also share updated housing trajectories once the Local Plan progresses through examination to formal adoption.

### Issues to be addressed via Local Plan policies

#### Integrated surface water management and SuDS

Both parties agree that the relevant Local Plan policy will require all new developments to the principles of integrated water management and the hierarchy of discharge routes set out within the National Standards for Sustainable Drainage (the latest being issued June 2025).

In line with the National Standards, both parties agree that Medway Local Plan 2041 Policy DM1 (Flood and Water Management) will:

- not allow new surface water connections to the foul network and resist new connections to the combined sewer network, and
- encourage the separation of rainwater from wastewater at source to prevent clean surface water run-off from entering the foul or combined sewer networks.

This approach is critical to mitigate flood risk and enhance resilience of communities to the impacts of climate change, protect local water quality, and mitigate storm overflow discharges into the future.

Both parties agree that the relevant Local Plan policies will embed principles to enhance surface water management and resilience against climate change.

#### Network capacity constraints and development phasing

Southern Water's initial checks indicate that multiple site allocations face limited local network capacity. Whilst an existing lack of capacity is not a fundamental constraint to the Local Plan and its site allocation, both parties agree that standard protective policy text will be included for these allocations stating that the occupation of development will be phased to align with the delivery of necessary network reinforcements.

Where existing Southern Water infrastructure crosses proposed allocations, both parties agree that the site layout must be planned to safeguard the network,



secure necessary easements, and ensure unhindered future access for asset maintenance or potential upsizing of sewerage infrastructure.

### Proximity to operational WWTW

To protect future residential amenity and safeguard the ongoing operation of WWTW, both parties agree that relevant policies will require that any site allocation falling within 500 meters of an to be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works.

### Protection of drinking water quality

Both parties agree that the relevant Local Plan policies will refer to Southern Water's SuDS in SPZs guidance to protect drinking water quality - [suds-in-spz-guidance.pdf](#).

### Issues to be addressed via the IDP

In response to Medway Council's 'Supporting Evidence Documents' consultation, Southern Water reiterated necessary updates to the IDP. Medway Council welcomed Southern Water's considered representations; they will be used to update the next iteration of the IDP, which should be regarded as a 'live' document.

## Areas to be agreed

### Addressing water efficiency

Southern Water strongly advocates for the inclusion of tighter water efficiency targets within the Local Plan than those currently required by standard Building Regulations, on grounds of the serious water-stress status of the South East region and the long-term need for demand management.

Medway Council's Local Plan Viability Assessment (ref: B5) of June 2025 tested 110, 100 and 90 Litres Per Person Per Day (LPPPD). The impact of seeking a 100 LPPPD standard on greenfield sites is about £7,000 per ha. The impact of seeking the tighter 90 LPPPD is very much more at about £40,000 per ha.

This matter will need to be considered further by the Medway Council's viability consultant in consideration of environmental incentives offered by Southern Water for water efficiency.



Both parties agree that there are no areas of disagreement between the parties relating to the emerging Medway Local Plan 2041 and will both continue to work proactively on the key strategic cross boundary issues identified in this SCG.

## Governance arrangements

This Statement of Common Ground (SoCG) will be monitored and kept under review by both Medway Council and Southern Water to ensure it accurately reflects both parties' positions as the emerging Medway Local Plan progresses towards adoption, and also for future necessary policy changes around water efficiency appropriate to the Medway region.

Both parties agree that the SoCG will be formally reviewed and, if required, updated during or following the Independent Examination process, should any proposed Main Modifications significantly alter housing numbers, spatial strategy, or site allocations.

Outside of formal Local Plan milestones, a review of this document or the data underpinning it may be triggered by significant shifts in national planning policy, statutory environmental standards, or water industry regulations.

## Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

### **On behalf of Medway Council**

|           |                                                                                     |
|-----------|-------------------------------------------------------------------------------------|
| Name      | Dave Harris                                                                         |
| Position  | Chief Planning Officer                                                              |
| Signature |  |
| Date      | 7 August 2026                                                                       |

**On behalf of Southern Water**

|           |                                                                                   |
|-----------|-----------------------------------------------------------------------------------|
| Name      | Daniel Whitcher                                                                   |
| Position  | Future Growth Lead                                                                |
| Signature |  |
| Date      | 10 August 2026                                                                    |