



Louise St John Howe
 PO Services, Unit 162298
 PO Box 7169
 Poole
 Dorset
 BH15 9EL

By email only

Planning Service
 Culture and Community
 Regeneration, Culture and Environment
 Medway Council
 Gun Wharf
 Dock Road
 Chatham
 Kent
 ME4 4TR
 Telephone: 01634 306000

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Dear Mr McCormack and Mr Hendley

**MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' INITIAL QUERIES LETTER
 (MLP/ED5)**

Thank you for your letter dated 27 March 2026 (MLP/ED5).

Please accept this letter on behalf of Medway Council ('the Council' hereafter) in response to initial queries within paragraphs 3 to 19. I am grateful for the extension provided for the Council to respond.

I have set out responses to paragraphs 3 to 19, reproduced below for your convenience. The Council will provide fuller responses to paragraphs 20 to 24 by 8 May 2026. The Council will provide fuller responses to paragraphs 25 to 29 by 15 May 2026.

Duty to Cooperate

3. The Council has helpfully provided several Statements of Common Ground (SoCG). Whilst this is noted, there also appears to be some indicated SoCGs which are in preparation. Please could the Council provide a list of the intended SoCGs to be submitted and provide an update on progress with outstanding joint SoCGs and the SoCG with Thurrock Council (re: Waste). The Council is also asked to clarify whether any further or updated SoCGs are to be submitted (e.g. with other utilities, developers of the strategic sites).

SoCG with Thurrock Council re Waste

The Council submitted an 'Initial Proposed Statement of Common Ground with Thurrock Council' (ref: A12.5), dated 2 June 2025. This document concerned the forecast capacity gap for the management of non-inert waste by landfill in Medway. Thurrock Council was unable to confirm that waste arising in Medway requiring management by landfill could continue to utilise non-inert landfill capacity at the South Ockendon site in Thurrock. The Council received an email, dated 30 October 2025, stating that a waste capacity and arisings assessment is underway. The Council sent an email to Thurrock Council on 17 April 2026 to request an update on the waste capacity and arisings assessment; however, at the time of writing, the Council has not received a response.

Other SoCGs

Please find a table of all SoCGs summarised at Appendix A.

The Council intends to produce five SoCG with planning agents for strategic sites, i.e. River Waterfront, Strood West, Capstone Valley, Hoo St Werburgh and Chattenden and Lower Rainham.

In addition, the Council intends to produce SoCGs with Southern Water and UK Power Networks.

The Council submitted version 7 of a 'Statement of Common Ground with Prescribed Bodies' (ref: A12.1). The Council produced version 8, dated 16 January 2026, of this document following correspondence with the Environment Agency, Natural England, NHS Kent and Medway Integrated Care Board and NHS Property Services. At the time of writing, all other prescribed bodies have signed version 8, apart from Gravesham Borough Council and Kent County Council.

The Council received minor comments from Gravesham Borough Council and Kent County Council on 17 March 2026 and 7 April 2026 respectively. These comments do not concern matters pertaining to other prescribed bodies. The Council is clarifying the governance processes for Gravesham Borough Council and Kent County Council so that version 9 can be finalised following a review of matters under discussion.

Sustainability Appraisal (SA), Special Protection Areas (SPA) & HRA Coverage

4. The Regulation 19 stage notes the SA informing the submitted strategy of the Plan. We note that the Plan also engages with international nature sites (SPAs/Ramsar) and references Strategic Access Management and Monitoring Strategy (SAMMS). As such, we ask the Council to confirm and set out how there is legal sufficiency in this regard and demonstrate that there is an adequate evidence trail of this engagement.

The Strategic Access Management and Monitoring Strategy (SAMMS) is a well-established approach in the Council's area. A brief overview response is provided here. A fuller response dealing with the Conservation of Habitat and Species Regulations 2017 will be provided as soon as possible.

The Council secures a SAMMS Mitigation Contribution on all consented developments that meet the requirements of falling within 6km of a SPA or Ramsar site. Alternatively, a developer can submit information to carry out an appropriate assessment in consultation with Natural England.

The SAMMS mitigation is a well-established approach in Medway, used for over 10 years. The funding is directed to the strategic North Kent Bird Wise programme. This strategic programme was set up in partnership with Natural England, local planning authorities in north Kent and environmental bodies. Natural England recognises the North Kent SAMMS programme as an effective approach to addressing the potential for negative impacts on the SPA and Ramsar sites from recreational disturbance. It has provided written advice (see Appendix B1) to north Kent local authorities in 2015. The work is informed by the evidence base on bird disturbance¹, visitor surveys and a Mitigation Strategy (see Appendix B2). This approach is referenced in the Submission SA (ref: A3.2 at paragraph 8.1.5). The approach is also established in local plan policy for other councils in north Kent, including the Canterbury

¹ Available at: <https://northkent.birdwise.org.uk/research-and-strategy-reports/#researchReports> (Last accessed on 27 April 2026)

District Local Plan, adopted 2017, Policy LB5 (see Appendix B3) and the Swale Borough Local Plan, adopted 2017, Policy CP7 and Policy DM28 (see Appendix B4).

5. Prior to a preferred development strategy being selected for the Plan, the Council is required to consider reasonable alternatives (e.g. different growth splits between urban, suburban, Hoo Peninsula). We ask the Council to provide a non-technical summary note setting out the reasonable alternatives explaining how they were identified, appraised and consulted on and why the preferred strategy was selected.

The relevant submission document is the 'Sustainability Appraisal - Volume 1 of 3 - Non-technical Summary' (ref: A3.1). This document set out how the reasonable alternatives were identified and appraised. More specifically, paragraphs N48 to N52 set out three reasonable alternative 'spatial growth options', along with commentary from the Council to explain why the preferred strategy was selected.

The Council consulted on an 'Interim Sustainability Appraisal - Volume 1 of 2 - Main Report' (ref: C2.4.1) and an 'Interim Sustainability Appraisal - Volume 2 of 2 – Appendices' (ref: C2.4.2) at Regulation 18 stage in 2024.

The Council consulted on the 'Sustainability Appraisal - Volume 1 of 3 - Non-technical Summary' (ref: A3.1) and the 'Sustainability Appraisal - Volume 2 of 3 - Regulation 19 Report' (ref: A3.2) and the 'Sustainability Appraisal - Volume 3 of 3 – Appendices' (ref: A3.3) at Regulation 19 stage in 2025.

6. In terms of the Habitats Regulations Assessment evidence, we ask the Council to provide the HRA screening / appropriate assessment conclusions, the SAMMS mechanism and delivery evidence for recreational disturbance mitigation. In providing this, we also ask for clarification on whether the policies in the Plan are reflective of the Submission HRA (ref: A4.1 to A4.3) as it proceeds the publication of this document. In addition, could the Council please confirm that it has sought the views of Natural England on the Submission HRA (ref: A4.1 to A4.3).

The Submission HRA (refs: A4.1, A4.2 and A4.3) provides the screening conclusions on the draft plan, and appropriate assessments for air quality, water quality and quantity, recreational pressure and urbanisation. The Submission HRA (ref: A4.1) has referred to the SAMMS mechanism in Chapter 7. Further evidence on the delivery and monitoring of the mitigation measures is provided through the monitoring² and annual reports³ to the Bird Wise Board.

The policies in the plan are reflective of the Submission HRA. However, as the air quality assessment identified a potential impact to the North Downs Woodland SAC south of Lidsing, the Council would wish to propose a modification to Policy SA7, and potentially SA2 and SA3, to reference a requirement for mitigation measures which would follow a similar approach to the Maidstone Local Plan Review (2021-38), adopted 2024, policies LPRSP14(A) and LPRSP4(B) (see Appendix C). This has been discussed and agreed with Natural England.

In preparing the work on air quality for the Submission HRA, the Council liaised closely with Natural England. The Council and its consultants sought the advice of Natural England on

² Available at: https://northkent.birdwise.org.uk/wp-content/uploads/2023/07/North-Kent-Bird-Disturbance-Survey-2021-22-v4_final.pdf (Last accessed on 27 April 2026)

³ Available at: <https://northkent.birdwise.org.uk/research-and-strategy-reports/#annualReports> (Last accessed on 27 April 2026)

the proposed methodology for the air quality assessment work. The Council provided a copy of the air quality assessment reports to Natural England and met with Natural England's officers in early December 2025 to discuss the reports and the final HRA for Submission. The Council continues to engage with Natural England in development of the Hoo Peninsula Strategic Environmental Programme, which will be the product of ongoing collaboration with Natural England and other stakeholders; it is not evidence base work to inform the plan.

Procedural Matters / Drafting Issues

7. Please could the Council clarify whether the submission Plan, dated December 2025 is the same version of the Plan that was consulted on at Regulation 19. If not, please set out clearly what has changed between the two versions and why.

The Pre-Submission Draft Medway Local Plan 2041 (Regulation 19) is Version 4 (ref: C1.1), dated 25 June 2025. The Submission Medway Local Plan 2041 (Regulation 22) is Version 5 (ref: A1), dated 11 December 2025. Version 5 has an updated front cover and header throughout; otherwise, it is the same document. It was considered necessary to update the front cover with reference to the plan-making stage, i.e. Regulation 22, as part of the wider suite of submission documents.

8. The date of the submitted Plan is noted as December 2025 and the Plan period is identified up to 2041. Paragraph 22 of the NPPF states that strategic policies in local plans should look ahead for a minimum period of 15 years from the date of adoption. Given that the examination of the Plan is currently at an early stage, its adoption is unlikely to occur during 2026. Therefore, please could the Council explain how the Plan will meet the requirement set out in paragraph 22 of the NPPF.

The Council recognises that the anticipated timetable for the examination means that the plan is unlikely to be adopted in 2026, and that the defined plan period to 2041 will not provide for 15 years ahead on adoption. It is likely that a period of 14 years will be provided.

The submitted plan has set out a strategy for Medway's growth that continues delivery of regeneration and provides for wider development through greenfield sites in suburban and rural locations. This strategy is consistent with a longer-term vision for Medway, with the redevelopment of the urban centres and waterfront, and planned expansion of wider towns and villages.

A number of large strategic sites, such as Hoo St Werburgh, and Medway City Estate provide land for development outside of the plan period. The housing trajectory identifies over 2,500 homes to be delivered post 2041, which will contribute to land supply for 15 years on adoption of the plan. It is anticipated that site allocations GN15, HHH22 & HHH31, LW8, SMI6 and SR53 will still be under construction post 2041. Based on the housing trajectory, these sites would deliver 7,780 homes during the plan period and 2,540 homes after the plan period. Table 2 of the 'Housing Delivery Topic Paper' (ref: B22.5) indicates an overall surplus in housing supply over the plan period.

The Council anticipates regular reviews of the plan and updating of the evidence base before 2041. This further work will be in the context of the new plan-making system and changes to local government. Kent and Medway are currently subject to consultation on Local Government Review and Spatial Development Strategies. We expect new local authorities and a Spatial Development Strategy to be in place by 2028. These are both important considerations for the review of the local plan.

Any extension to the plan period is likely to require updating and consulting on amended evidence and this would result in delays in adoption.

Given these matters, the Council's present position is that the plan period should not be extended. We view that there are benefits to progressing an updated plan that can provide certainty in managing Medway's growth, and which establishes the foundation for plan reviews. This is a pragmatic and reasonable approach.

The Council welcomes the further engagement with the Inspectors on this matter.

9. We note that the Plan contains Strategic Policies (S) and Non-Strategic Policies (DM), but also Thematic Policies (T). As such, it is unclear whether T policies are strategic or non-strategic. Please could the Council clarify the classification of the policies within the Plan.

Please find a classification of the policies within the submitted Plan and a classification to be requested as a main modification at Appendix D. Under section 23 of the Planning and Compulsory Purchase Act 2004 (as amended), the Council intends to formally request that main modifications be recommended, including this updated classification.

10. The Plan does not set out the policies in the adopted development plan that would be superseded. This is a requirement set out in Regulation 8 of the Town and County Planning (Local Planning) (England) Regulations 2012 (as amended) and is therefore a matter of legal compliance. Whilst we note that these policies are appended to the Council's covering letter submitted with the Plan, the Council is asked to clarify why the list of policies is not within the Plan. We should say that this matter could be rectified through a main modification to the Plan.

As noted above, Annex 2 of the 'Submission Letter to the Planning Inspectorate' (Ref: A5) set out a list of superseded policies in the adopted development plan.

The Council's local plan-making process started in November 2022 with a 'Call for Sites'. Following public consultations under Regulation 18 in 2023 and 2024, the publication and submission stages were important milestones for the Council within the electoral cycle.

The Council notes paragraphs 1.1, 1.3 and 1.4 of the Planning Inspectorate's 'Procedure Guide for Local Plan Examinations' (10th Edition). However, a consultation on an addendum containing the proposed changes would have delayed submission.

The Council considers that this list of superseded policies is introduced into the plan as a main modification. The Council will suggest additional wording for the plan to reflect this in due course.

11. We note also that the Plan contains no monitoring policy. Please could the Council provide an explanation why this is the case. Again, we state that this could be rectified through a main modification.

Paragraph 1.1 of the Planning Inspectorate's 'Procedure Guide for Local Plan Examinations' (10th Edition) states that "The plan that is published for consultation at Regulation 19 stage should be the plan that the LPA intends to submit to the Planning Inspectorate for examination."

The Council submitted a 'Monitoring Framework' (ref: A14), which was unavailable at Regulation 19 stage. Given paragraph 1.1 of the Planning Inspectorate's 'Procedure Guide

for Local Plan Examinations' (10th Edition), the Council could not append the Monitoring Framework to the plan.

The Council wishes for the Monitoring Framework to be introduced into the plan as a main modification. The Council will suggest additional wording for the plan to reflect this in due course.

12. In light of the above, we suggest that it may be prudent for the Council to produce a schedule of proposed changes (or modifications) to the Plan which can be added to throughout the examination.

The Council is preparing a schedule of proposed changes (or modifications) to the Plan, which will be maintained throughout the examination. This will capture the modifications referred to in this letter.

13. In relation to 'visions' within the Plan, some topic-based chapters contain a 'vision', in addition to the policies whilst others do not. Clarification is needed on why this is the case and what is the intended function of the visions, compared to the policies.

The submitted Medway Local Plan 2041 (Ref: A1) sets out four visions:

1. an overarching 'Vision for Medway in 2041';
2. a 'Vision for access and movement in Medway';
3. a 'Vision for minerals supply'; and
4. a 'Vision for waste management'.

The overarching Vision for Medway in 2041 is an aspirational but realistic statement on the character of Medway at the end of the plan period. It is intended as a basis for the strategic objectives.

The Vision for access and movement in Medway is in line with recommendations published by the Chartered Institute for Highways and Transportation's 'Better Planning, Better Transport, Better Places' (2019) guidance about the transition from 'predict and provide' to 'vision and validate' approaches to transport assessments. Paragraph 9.1.5 of the submitted Medway Local Plan 2041 states that "Development proposals will describe how they support the place-based vision for access and movement." The vision for access and movement should help applicants to comply with Policy DM15 (Monitoring and Managing Vehicle Trip Generation) and Policy DM18 (Transport Assessments, Transport Statements and Travel Plans).

The visions for minerals supply and waste management set out more detailed statements on the minerals supply and waste management in Medway which is envisaged at the end of the plan period, followed by more detailed objectives which provide a distinct basis for the minerals supply and waste management policies. Having separate visions for these matters is appropriate given the approach adopted to both matters.

Evidence

14. We note that there appears to be no final version of the Green and Blue Infrastructure Plan. Moreover, the Medway Playing Pitch Strategy (Strategies) also appear(s) to be outstanding. Clarification is requested as to when these documents will be submitted. The Council should also clarify whether the Strategic Flood Risk Assessment (SFRA), the HRA and the Strategic Transport Assessment are now final versions of those documents, or whether the discussions with the respective prescribed bodies could mean they will need to be updated further.

The Green and Blue Infrastructure Strategy was not progressed to formal adoption in advance of the Kent and Medway Local Nature Recovery Strategy, as it was considered that the latter should provide updated evidence and objectives to reflect in the Medway Green and Blue Infrastructure Strategy. The Kent and Medway Local Nature Recovery Strategy was published in late 2025, and the Council is now considering the most appropriate approach to updating its policy work on green and blue infrastructure.

In agreement with Sport England, the Council's work on an updated Playing Pitch Strategy and Built Facilities Plan was delayed awaiting the preparation of a best practice methodology promoted by Sport England. A draft Playing Pitch Strategy and Built Facilities Strategy will be available by 22 May 2026. However, these documents will be subject to change to allow for Sport England's and the steering group's review. The action plans associated with the Build Facilities Strategy should be progressed through specific engagement with clubs and operators prior to publication. The final documents should be available by the end of June. This is an agreed matter with Sport England, as in paragraph 2.14.2 in the 'Statement of Common Ground with Prescribed Bodies' (ref: A12.1).

The Submission Habitats Regulations Assessment (HRA) December 2025 (refs: A4.1, A4.2, A4.3) reflects the final work for the draft plan, and was discussed with Natural England.

The Strategic Flood Risk Assessment (SFRA), November 2025 (refs: B6.1, B6.2, B6.3, B6.4 and B6.5) reflect the final version of this work.

The Strategic Transport Assessment (STA) (refs: B18.1, B18.2, B18.3, B18.4, B18.5, B18.6, B18.7, B18.8, B18.8.1, B18.8.2, B18.8.3, B18.9, B18.10, B18.11, B18.12) are final versions. The STA informed the Statement of Common Ground with National Highways (ref: A12.2).

In addressing the matters reached in paragraph 16 of your letter, the Council proposes to make the Submission HRA, SFRA and STA documents available for consultation. The Council will then respond to that consultation as necessary.

15. The Council is asked to provide clarification on whether the SA will need updating to consider potential impacts, as it predates a number of these other key evidence documents and refers to emerging versions.

The Council's Sustainability Appraisal consultant has advised that a proportionate review of the evidence base is required to confirm whether any updates have implications for the assessment findings. For example, updates to the SFRA might influence individual site-level SA scores. The extent to which this affects the overall residual significant effects at the plan level will be confirmed through that review. The Council will address this through the 'Next Steps' set out below.

16. Please could the Council clarify which submission documents were not available for the Regulation 19 consultation and set out whether or how the Council proposes to address this issue. This matter is also raised in relation to the points made in the letter received from an interested party named 'Save The Hoo Peninsula' (Richard Buxton Solicitors), dated 19 March 2026 (ref: ED4).

Please find a table that shows whether each submission document was available for the Regulation 19 consultation at Appendix E.

This Council acknowledges the list of documents set out in paragraph 4 of the letter from an interested party named 'Save The Hoo Peninsula' (Richard Buxton Solicitors), dated 19 March 2026 (ref: MLP/ED4). However, as in the 'Medway Council's Notes' column of the table at Appendix E, 12 previous versions of these documents were available for the Regulation 19 consultation.

Without making any concession that the process to date has been either flawed or insufficient (and also rejecting the criticism in MLP/ED4), the Council has proposed to address this issue under 'Next Steps' below.

17. We note that some evidence upon which the Plan relies is now of a significant age or appears to be in draft form. To assist us in our understanding of why this appears to be the case, the Council is asked to provide a clear overview of the evidence submitted and identify where gaps in evidence exist and why in relation to the strategy and policies contained within the Plan.

The table at Appendix E shows the date of each of the 56 submission documents comprising the evidence base. Of these 56 documents, 40 were published in 2025 and 12 were published in 2024. The Council considers that there are no gaps in the evidence base, although an update to the Playing Pitch Strategy is underway.

The Playing Pitch Strategy (refs: C2.18.1 and C2.18.2) was finalised in October 2019 and covered the period 2018 to 2035. In response to the Regulation 19 consultation, Sport England noted that a Playing Pitch Strategy and a Built Facilities Plan is to be commissioned in January 2026. Sport England's representations suggested that this could require changes to policies. The Council recognises the potential need for changes to policies; this matter is agreed in the 'Statement of Common Ground with Prescribed Bodies' (ref: A12.1). The Council will maintain a schedule of proposed changes (or modifications) to the Plan throughout the examination.

The Council continues to work on matters which aid ongoing cooperation and implementation of the plan.

The body of retail evidence reflects the economic, market and national policy changes over time and the uncertainty of relying on projections of need into the future. The older retail evidence base documents, including the masterplans (refs: B15, B16 and B17) that were published in December 2019, provide a useful foundation for policy direction. More recent studies and ongoing work, which build on this foundation, are collaborative pieces coordinated across various services within the Council to deliver on economic and community ambitions and responding to the nationally promoted design codes.

The Council has adopted the 'Chatham Design Code' (ref: B14), which builds on the 'Chatham Town Centre Masterplan and Delivery Strategy' (ref: B15). The Council is actively investigating options for the preparation of further design codes. The 'Retail and Town Centres Study' (ref: B13), prepared in 2025, supports the spatial strategy, while acknowledging the fluidity of the retail market and the widely accepted uncertainty in accurate forecasting.

As in section 2.13 of the ‘Statement of Common Ground with Prescribed Bodies’ (ref: A12.1), the Council has commissioned a flood defence strategy to aid ongoing, long-term collaboration with the Environment Agency.

In addition, the Council has commissioned additional work to produce an outline design, costings a traffic modelling of an interim scheme (i.e. within the highway boundary) for junctions on the A228 that require mitigation early in the plan period. This will inform collaboration in the drafting of SoCGs with planning agents.

Strategic Site Delivery

18. To assist our overall understanding of strategic site delivery, please could the Council demonstrate deliverability within the Plan period for each strategic site with regard to its master planning status; land control; anticipated application dates; specific infrastructure required; infrastructure funding route; anticipated start and completion dates and any other critical path item. This information should be set out clearly in an explanatory note.

Please find this information for 18 strategic sites at Appendix F, along with paragraphs 12.71, 12.72 and Table 12.7c of the Viability Assessment (ref: B5). Please note, site-specific information is subject to change during the drafting of SoCGs with planning agents. Additional site-specific detail will be provided in the SoCGs.

Housing

19. Paragraph 78 of the NPPF requires local plans to illustrate the expected rate of housing delivery through a housing trajectory. It appears to us that the Plan does not include such a trajectory setting out this detail. We therefore ask the Council to clarify why this is the case and to provide, in an explanatory note, a housing trajectory on the basis of the development strategy set out in the Plan and the planned for delivery of housing for the Plan period.

The Council submitted a ‘Housing Delivery Topic Paper’ (ref: B22.5). The Housing Delivery Topic Paper presented a stepped housing requirement, with a housing trajectory set out in the appendix of that document. The Council wishes for this trajectory to be introduced into the plan as a main modification. The Council will suggest additional wording for the plan to reflect this in due course.

The Council’s local plan-making process started in November 2022 with a ‘Call for Sites’. Following public consultations under Regulation 18 in 2023 and 2024, the publication and submission stages were important milestones for the Council within the electoral cycle.

The Council notes paragraphs 1.1, 1.3 and 1.4 of the Planning Inspectorate’s ‘Procedure Guide for Local Plan Examinations’ (10th Edition). However, a consultation on an addendum containing the proposed changes would have delayed submission.

Green Belt

20. The Plan proposes the release of Green Belt land, relating to an area of land to the west of Strood, following an assessment that areas of grey belt exist which provide exceptional circumstances to justify the release. Other more minor alterations to the Green Belt are also proposed. We have a number of initial queries, as set out below, where we are seeking a response from the Council at this stage through a Green Belt Note.

A Green Belt Note will be provided by the end of 8 May 2026.

21. It is understood that the Green Belt Review was made in 2025, when the Plan reached the Regulation 19 stage. The Council is therefore requested to clarify what consultation was carried out on the proposed Green Belt release prior to the submission of the Plan for examination and what documents were made available for consultation. This should include clarification of what constitutes the Council's in house Green Belt Review and, separately, the critique by independent consultants. Please also confirm whether the Policies Maps accurately show the intended extent of all the changes to the Green Belt.

A Green Belt Note will be provided by the end of 8 May 2026.

22. We also understand that the review was undertaken with regard to national policy and we would find it useful for it to be set out how the NPPF and the Planning Practice Guidance: Green Belt were applied to the methodology that is engaged in the Green Belt Review (ref: B8). While it is highly likely that we will have questions on the methodology used throughout the examination, clarification should also be provided at this stage on how parcels were derived (and in some instances amalgamated), the application of the Green Belt purposes, why land has been released in part of the other parcels (other than land to the west of Strood) and why not all aspects of the Green Belt Review were taken forward.

A Green Belt Note will be provided by the end of 8 May 2026.

23. A further aspect of the proposed release of Green Belt land is how it relates to the release of such land in adjoining Gravesham Borough Council (Gravesham). Please clarify whether the reviews are co-ordinated and the nature of the discussions with Gravesham, including working groups, meetings, minutes, Council resolutions, or similar. Please also clarify if a co-ordinated approach to methodology has taken place and if consideration has been given to whether there would be exceptional circumstances to justify the release of land to the west of Strood, were the release of Green Belt land in the adjoining part of Gravesham not to occur.

A Green Belt Note will be provided by the end of 8 May 2026.

24. Please also provide an update of the latest positions with Gravesham's review of the Green Belt and the position with neighbouring Tonbridge and Malling Council, which has also been referred to in the Green Belt Review.

A Green Belt Note will be provided by the end of 8 May 2026.

Gypsy, Traveller & Travelling Showpeople

25. The Plan recognises there will be a need during the Plan period for further pitches/plots for Gypsy and Traveller households and for Travelling Showpeople. However, it does not seek to allocate sites but rather rely on a criteria-based policy (T10). We have a number of initial queries and have some concerns about the soundness of this approach, as set out below. Again, we are seeking the Council's response at this stage through a topic-specific note.

The Council submitted a 'Gypsy and Traveller Accommodation Topic Paper' (ref: B.22.7).

The Council notes that the Inspectors request a topic-specific note. This is in production. Interim responses are provided below where possible (and without prejudice to the topic-

specific note which will be provided). A topic-specific note will be provided by the end of 15 May 2026.

26. There appears to be discrepancies in the level of need identified between the Gypsy and Traveller Accommodation Assessment (GTAA) (ref: B11.1) and Addendum (ref: B11.2), and Policy T10, based on the interpretation of the definitions under the Planning Policy for Traveller Sites (2024) (PPTS). The GTAA and Addendum identify a total need for 56 Gypsy and Traveller households, and 8 for Travelling Showpeople. Yet, paragraph 6.10.7 of the Plan states there is a need for 31 pitches for Gypsy and Traveller households and 3 for Travelling Showpeople. These apparent discrepancies should be explained.

The GTAA Addendum, 2024 (ref: B11.2) sets out the identified needs, taking account of the updated 2024 planning definition of travellers. The reference at paragraph 6.10.7 refers to superseded evidence, and the Council will propose a modification to the plan to address this inconsistency.

27. The Council should also explain why it considers its approach accords with the PPTS. This includes criterion a) of paragraph 10 over whether under the Plan there is in fact a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets. Similarly, under criterion b) over developable sites, or broad locations for growth over the remainder of the Plan period, and paragraph 11 over what criteria the Council has set to guide land supply allocations where there is identified need.

The Council's approach is explained in the Gypsy and Traveller Accommodation Topic Paper (ref: B.22.7), and it notes the lack of specific deliverable sites to meet the five-year land supply requirement.

Since the preparation of the Topic Paper, planning consent has been granted for a further 8 pitches at High Halstow (MC/25/0937). This has helped to evidence planning applications as an important source of supply, with certainty on delivery established through consents.

The Council is considering further options for increasing supply on its land, and this will be a matter for a Cabinet report in coming months. We will be able to provide an updated Topic Paper for the examination.

The Council will also explore the potential for provision of pitches as part of strategic development allocations in the plan and will address this also in the Topic Paper.

28. The Plan relies on the intensification and expansion of sites to meet need through the policy. It is highly likely that we will have questions on whether such an approach is consistent with national policy through the PPTS, as well as on the methodology and recommendations of the GTAA and Addendum. While paragraph 11 of the PPTS goes on to allow for a criteria-based policy approach, this is where there is no identified need, and so the Council should explain its position in this regard. Notwithstanding this, please also explain why there are not the related allocations showing extensions of existing sites.

A topic-specific note will be provided by the end of 15 May 2026.

29. There is also a need to explain whether the SA (ref: A3.1 to A3.3) has considered the need when it has discounted the site at Cuxton (CHR13), and why it did not consider two other Gypsy and Traveller sites identified in the Land Availability Assessment (ref: B1) at Upnor (SR32) and Chattenden (SR41). If the Council did not consider that suitable sites had come forward for Gypsy and Traveller, and Travelling Showpeople, the Council is asked to explain why a separate call for sites exercise was not undertaken due to the identified need.

The sites SR32 and SR41 were screened out because they were not considered to be suitable for development due to impacts on SSSIs.

The Gypsy and Traveller Accommodation Topic Paper (ref: B.22.7) refers to the Council's work through iterative Call for Sites processes to identify land available for gypsy and traveller accommodation, and that this had been unsuccessful in identifying new suitable sites.

The Council proposes to issue a further targeted Call for Sites specifically for land suitable for gypsy and travellers and travelling showpeople accommodation. If this approach is supported, the Council would be able to run this exercise for six weeks from as soon as possible to inform further work for the examination.

Next Steps

I have sought to provide you with clarifications on a number of queries, and to outline the Council's approach to addressing matters raised in your letter.

The Council will review the submitted SoCGs through ongoing engagement activities. The Council intends to produce SoCGs with planning agents for strategic sites, as well as SoCGs with Southern Water and UK Power Networks.

The Council is preparing a schedule of proposed modifications for your consideration, and will update the schedule throughout the examination.

I note that you have identified that further consultation may be necessary before any hearing sessions take place.

A fuller response dealing with the Conservation of Habitat and Species Regulations 2017 would be provided as soon as possible.

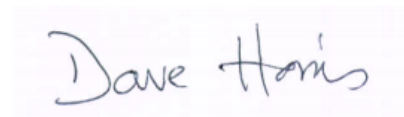
A Green Belt Note will be provided by the end of 8 May 2026. A Gypsy, Traveller & Travelling Showpeople Note will be provided by the end of 15 May 2026.

The Council would like to propose publication of the Submission documents listed at our response above to your query at paragraphs 14 and 16 for a period of six weeks for consultation, including a proportionate review of the SA. This would allow for further representations on those documents. Subject to your approval, the Council would be able to start this consultation in June and complete the consultation and report back by late August. Alternatively, you may wish to consider a staggered consultation, starting in late May, based on the current availability of evidence base documents.

During this same period, or sooner if agreeable, the Council would hold a targeted Call for Sites for Gypsy and Traveller and Travelling Showpeople uses. This would support work in identifying further options for consideration.

I hope that this is a useful approach that will assist you in advising on the next steps and timing in the examination.

Yours sincerely

A handwritten signature in blue ink that reads "Dave Harris". The signature is written in a cursive style and is enclosed in a light blue rectangular box.

Dave Harris
Chief Planning Officer

Appendix A

Summary of statements of common ground

REFERENCE	DOCUMENT TITLE	SUBMITTED VERSION AND DATE	CURRENT STATUS	MEDWAY COUNCIL'S NOTES
A12.1	Statement of Common Ground with Prescribed Bodies	Version 7, 17 December 2025	Version 8, 16 January 2026	The Council received minor comments from Gravesham Borough Council and Kent County Council on 17 March 2026 and 7 April 2026 respectively. These comments do not concern matters pertaining to other prescribed bodies. The Council is clarifying the governance processes for Gravesham Borough Council and Kent County Council so that version 9 can be finalised following a review of matters under discussion.
A12.2	Statement of Common Ground with National Highways	Version 4, 17 December 2025	Version 4, 17 December 2025	The Council will review matters set out in Version 4 during a meeting with National Highways in May 2026.
A12.3	Statement of Common Ground with Maidstone Borough Council	Version 5, 16 December 2025	Version 5, 16 December 2025	The Council will review matters set out in Version 5 during a meeting to be arranged in May 2026.
A12.4	Statement of Common Ground with Kent County Council - Waste Management and Minerals Supply	July 2024	Final	The Kent Minerals and Waste Local Plan 2024 to 2039 was adopted on the 13 March 2025.
A12.5	Initial Proposed Statement of Common Ground with Thurrock Council	Version 1, 2 June 2025	Version 1, 2 June 2025	The Council submitted an 'Initial Proposed Statement of Common Ground with Thurrock Council' (ref: A12.5), dated 2 June 2025. This document concerned the forecast capacity gap for the management of non-inert waste by landfill in Medway. Thurrock Council was unable to confirm that waste arising in Medway requiring management by landfill could continue to utilise non-inert landfill capacity at the South Ockendon site in Thurrock. The Council received an email, dated 30 October 2025, stating that a waste capacity and arisings assessment is underway. The Council sent an email to Thurrock Council on 17 April 2026 to request an update on the waste capacity and arisings assessment; however, at the time of writing, the Council has not received a response.
n/a	Statement of Common Ground - River Waterfront	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - Strood West	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - Capstone Valley	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - Hoo St Werburgh & Chattenden	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - Lower Rainham	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - Southern Water	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.
n/a	Statement of Common Ground - UKPN	n/a	Version 1 to be drafted based on engagement to date.	Version 1 to be issued to all parties in May 2026.

Appendix B1

Natural England's Written Advice - Recreational Pressure and Bird Disturbance

Date: 06 January 2015
Our ref: 137979
Your ref: NKEPG



North Kent Environment Planning Group - Officers:
Canterbury City Council
Dartford
Gravesham
Medway
Swale

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear NKEPG colleagues,

Recreational Pressure and Bird Disturbance

Consultation: Housing policy and plans with the potential to impact on the suite of Special Protection Areas (SPAs) and Ramsar Sites that make up the North Kent Marshes.

Internationally Designated Sites: The Swale, Medway Estuary and Marshes, and Thames Estuary SPAs and Ramsar sites.

We are writing to you to provide the Local Authorities and NKEPG members with Natural England's advice regarding the potential for impact of recreational disturbance from proposed housing on the bird interest¹ features of the three Special Protection Areas and Ramsar² sites listed above which collectively comprise the North Kent Marshes SPAs / Ramsar sites.

Background

Following the South East Plan allocation of around 70,000 houses between 2006 and 2026, across the North Kent area, concerns were raised about the potential impact of recreational disturbance on bird populations of the three SPAs and Ramsar sites of the North Kent Marshes that cover the majority of the North Kent coastline. In response to this, the NKEPG commissioned a number of reports (see annex 1), to assess the current and future levels of recreational activity on the North Kent Marshes SPAs and Ramsar sites.

Natural England is a member of the NKEPG for this project and also has a statutory role in advising on the potential effects of development on the conservation of SPAs and Ramsar sites. We have been working together to collate the evidence requirement to demonstrate in accordance with the Habitat Regulations³ whether the proposed level of housing, now identified as approximately 68,000

¹ SPA site list and qualifying features <http://jncc.defra.gov.uk/> and Ramsar <http://jncc.defra.gov.uk/page-1389>

² Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.

³ Requirements are set out within Regulations 61 and 62 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 61 and 62 are commonly referred to as the 'Habitats Regulations Assessment' process. The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>



houses in local plans coming forward over the next few decades (based upon local plan with end dates between 2026-2033), would significantly impact on the bird interest features of the SPAs and Ramsar sites.

In July 2012, an interim report⁴ was collated that put into context all existing data in relation to bird disturbance for the SPAs and Ramsar sites to enable the findings to be used in the assessment of development.

In summary, the report's conclusions were worded as follows (we have lifted the text directly):

- There have been marked declines in the numbers of birds using the three SPAs. Declines are particularly apparent on the Medway and have occurred at the locations with the highest levels of access.
- Disturbance is a potential cause of the declines. The disturbance study shows birds are responding to the presence of people, and there is evidence that the busiest locations (which have seen the most marked bird declines) support particularly low numbers of birds.
- Access levels are linked to local housing, with much of the access involving frequent use by local residents. Indicative data on future housing development, when used with the visitor data to estimate change in access levels between now and c.2026, would suggest that the SPA/Ramsar sites would see a future increase of approximately 15%.
- All activities (i.e. the volume of people) are potentially likely to contribute to additional pressure on the SPA sites and should be addressed within mitigation plans. Dog walking, and in particular dog walking with dogs off leads, is currently the main cause of disturbance (by far) and therefore should be a focus for mitigation. Other particular activities are those that involve people on the mudflats or the water.
- Development within 6km of access points to the SPAs is particularly likely to lead to increase in recreational use of the SPAs. Local greenspace use such as dog walking, cycling, jogging, walking and to some extent family outings will originate from people living within this radius.
- Beyond 6km from access points onto the SPA, large developments or large scale changes to housing levels will also result in increased recreational use. It would appear that visitors to the North Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne. People living within this broad coastal strip (i.e. beyond 6km from SPA access points and north of the M2/A2) are likely to visit for more coastal specific activities. Assuming users will be drawn to make a dedicated trip to particular features/areas, then the following can be highlighted:
 - the mouth of the Swale (for kite/windsurfing, dog walking with dogs off leads on the intertidal, bait digging);
 - the upper parts of the Swale (boating activities);
 - the upper parts of the Medway around Gillingham, Upnor and Rochester (where considerable infrastructure is present and lots of boating activity including powerboats, RIBs etc.)
 - nature reserves at Sheppey, Oare Marshes, Cliffe and Northward Hill.

In addition to summarising the evidence for recreational disturbance the interim report also considered the distance over which these recreational impacts are likely to be significant and

⁴ Liley, D., Lake, S. & Fearnley, H. (2012) North Kent Interim Overarching Report. Footprint Ecology/GGKM/NE
Page 2 of 6

identified potential mitigation measures to address the impacts. The importance of monitoring was also highlighted. These issues were summarised in the report as worded below:

- Development beyond 6km (excluding large sites) can be potentially screened out of assessments and assumed to have no likely significant effect on European sites. For development that does fall within 6km (or large sites beyond 6km) it will not be possible to demonstrate no adverse effect on integrity of the European sites and mitigation measures will need to be considered.
- Mitigation measures are discussed within the report and include awareness raising, on-site wardening, provision of signage and access infrastructure, provision/enhancement of green space away from the SPAs and direct contacts with users.
- Areas currently undisturbed, and in particular the main roost sites should, in particular, be protected from additional recreational pressure.
- The importance of monitoring and its role in determining the effectiveness of measures and identifying the need for modifications of measures was explained in section 5.7 of the report.

Natural England's advice to Local Authorities

As the conclusions in the interim report are based on the best available scientific evidence, Natural England's advice is, that it is likely that a significant effect will occur on the SPAs / Ramsar sites from recreational pressure arising from new housing proposals either alone or in-combination in the North Kent coastal area.

The Local Authorities have 2 options if they wish to deliver new housing in the area, these are:

- 1) To carry out further assessment (termed Appropriate Assessment (AA) under the Habitat Regulations) to demonstrate conclusively that bird disturbance from recreational activities of future housing will not be a significant cause of bird numbers declining on the SPAs / Ramsar sites, i.e. it will not cause an adverse effect on the integrity of the sites and therefore does not require mitigation.
- 2) Or that future housing provides suitable mitigation through a strategic approach, in order to ensure that a significant effects from recreational impact does not occur on the SPAs / Ramsar site as a result of this new development.

As the competent authorities for planning under the Habitat Regulations the Local Planning Authorities that comprise members of NKEPG need to consider how best to take this advice forward. Ideally, whichever approach is decided on this would be best delivered jointly through the continued partnership of NKEPG.

Natural England advises that either of the following two approaches can be taken:

1) Further Appropriate Assessment

The Local Authorities could seek to demonstrate conclusively that recreational pressure is not a significant impact on bird declines on the SPAs / Ramsar sites. To do this further assessment (AA) is required of the local authorities' strategic plans and we would suggest that this may need to cover the following issues:

- prey abundance studies within the coastal designated sites
- site specific visitor studies

- detailed ecological modelling based on the above to better understand the possible reasons for bird declines within the coastal designated sites

Until this assessment is completed, future development proposals are still considered likely to have a significant effects. This is because until it can be confirmed through further evidence that there is no risk to the SPAs / Ramsar sites from recreational impacts from future housing, Natural England's advice is, that based on the best available evidence currently, the likelihood of a significant effect on the SPAs / Ramsar sites cannot be ruled out. Therefore for any development to proceed prior to the AA being completed new housing developments would require mitigation measures.

It should be noted that following AA, it is possible that the evidence still remains inconclusive as to whether recreational disturbance is a significant cause of bird decline and mitigation measures may still be required for new housing.

2) Strategic Avoidance / Mitigation

In September 2013 a workshop was held to discuss potential mitigation measures and NKEPG commissioned a report to identify a mitigation package for the SPAs / Ramsar sites. A final version was submitted to the group in July 2014 (as yet unpublished) entitled Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy⁵. This report considered a 'long list' of mitigation options that were refined into the elements considered necessary by the consultants to form the basis of the recommended strategy. These elements were:

- A North Kent Coast Dog Project
- Wardening/Visitor Engagement
- New Access Infrastructure
- Parking: Strategic Review and Changes to Parking
- Codes of Conduct
- Interpretation/signage
- Work with local (interest) club/group
- Refuge (provision for birds)
- Enhancement of existing (access) sites to create hub
- Enhancement to existing GI away from SPA
- Enforcement
- Monitoring

Natural England has yet to provide detailed comments on the proposed mitigation strategy, however the mitigation elements of the strategy cover similar concerns and approaches of other authorities dealing with coastal SPAs / Ramsar sites experiencing bird disturbance from recreational impacts. For coastal sites the main focus is access management. However, the use of green infrastructure / green space if evidenced may also be an important component of the mitigation measures.

If the Local Authorities are minded to adopt this approach or similar Natural England is available to provide further detailed advice and guidance based on our experience of these strategies elsewhere in the country.

Natural England's advice is that the use of a strategic mitigation set of measures similar to those proposed above would enable the screening out of housing developments, at the first stage of the Habitat Regulations, as having no likely significant effect on the suite of SPAs / Ramsar sites.

There are a number of advantages of applying strategic mitigation in the form of Access

⁵ Liley, D., & Underhill-Day, J., (2013) Thames, Medway and Swale Estuaries – Strategic Access and Management and Monitoring Strategy unpublished.

Management and Monitoring such as:

- cost effectiveness should be part of the strategy design
- the reduction in full AAs that need to be carried out by the competent authorities, as the majority of development would be screened out of further assessment if mitigation is applied.
- the approach is consistent and proportionate to the scale of development and not onerous
- developers know up front what the mitigation measures are and the cost involved
- the comprehensive nature of a strategic approach to be able to consider the SPAs / Ramsar sites as a whole and ensure that measures are specifically targeted whilst ensuring that disturbance is not displaced to other areas of the SPAs / Ramsar sites
- the overall package of measures generally allows for flexibility in implementation, with the introduction of measures that will mitigate for development as it comes forward in the plan
- monitoring of recreational activities in relation to bird numbers is an integral part of the mitigation and this allows measures to respond to the evidence coming forward whilst ensuring no adverse effect occurs on the SPAs / Ramsar sites.

However, if bespoke mitigation is proposed by individual developers, Natural England's advice is that this will require careful consideration in order to demonstrate that the mitigation being put forward would ensure that bird disturbance from recreational pressure would not increase on the SPAs / Ramsar sites as a result of the proposed development. If having considered any mitigation measures proposed, the likelihood of a significant effect cannot be ruled out, an appropriate assessment will be required.

Working Together

Whilst this body of evidence has been growing, communications have continued to take place between Natural England and the Planning Authorities. Natural England is satisfied that these communications have advised the competent authorities that the available evidence needs to be taken into account when making planning decisions and of the potential approaches that are open to them as outlined in this letter.

Natural England is available to advise the group further and we very much hope that NKEPG can continue to take this work forward as a group, as we believe that this is the most efficient and effective way of addressing these concerns.

If the decision is to carry out further assessment to demonstrate that recreational impacts are not a significant issues we can help to advise on the requirements for these further studies and the interim mitigation that is required.

Should the NKEPG decide that the approach to be taken is to secure appropriate mitigation measures that can be applied, on either a site specific or strategic basis, to avoid adverse effects; Natural England is confident that it is possible to implement such measures and will engage with Local Authorities in North Kent on local plans and specific development proposals that are seeking to do so.

We hope that this letter sets out clearly Natural England's advice on the North Kent Marshes SPAs / Ramsar sites in relation to bird disturbance and recreational impacts from future housing and the options available to the Local Authorities. We look forward to discussing these issues with you all at the next NKEPG meeting and we would welcome the proposal of a date for when this will occur.

Yours sincerely

Angela Marlow
Sussex and Kent Team

Annex 1:

Previous studies in North Kent that relate to recreation pressure and other potential threats to the bird interest of the SPAs.

- 1) What do we know about the birds and habitats of the North Kent Marshes? (Cruickshanks et al 2011a)
- 2) Bird Disturbance Study, North Kent 2010/11 (Liley & Fearnley 2011)
- 3) North Kent Visitor Survey Results (Fearnley & Liley 2011)
- 4) North Kent Comparative Recreation Study (Fearnley & Liley 2012)
- 5) Estuary Users Survey (Medway Swale Estuary Partnerships, 2011)
- 6) GGKM Roost survey (mapped in Liley & Fearnley 2011)
- 7) Recent Wetland Bird Surveys results produced by the British Trust for Ornithology
- 8) Phase 1 Bird Disturbance Report (Liley, Lake, & Fearnley 2012)
- 9) Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy (Liley and Underhill-Day 2013) (unpublished)

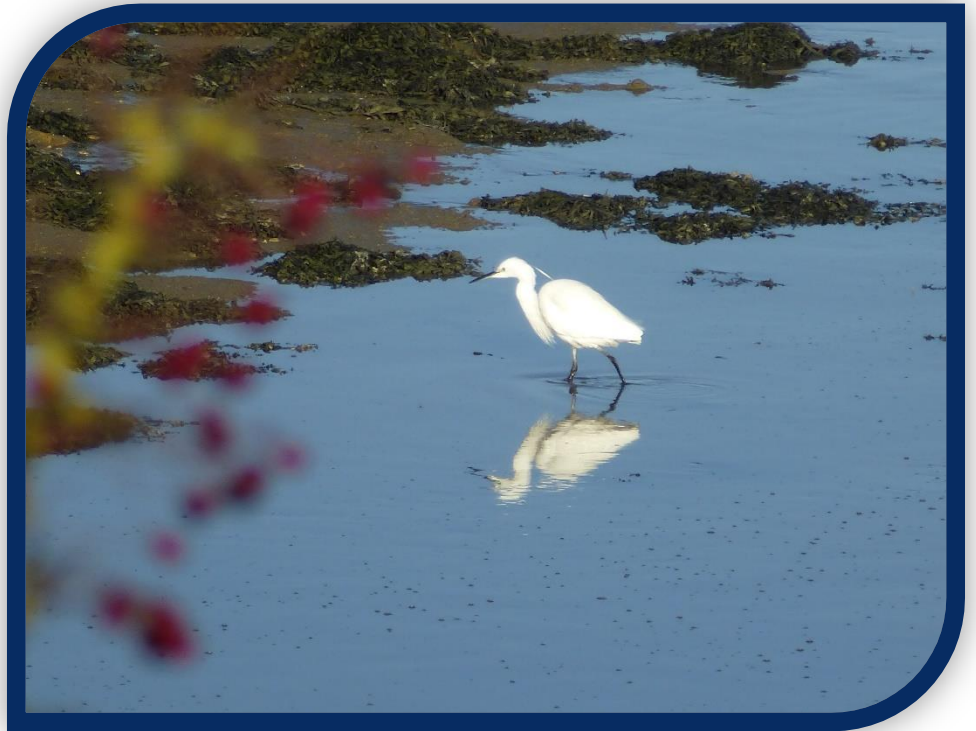
Appendix B2

Bird Wise North Kent - Mitigation Strategy



Bird Wise North Kent

Mitigation Strategy



North Kent SAMMS Project Board

January 2018

Foreword

Providing sufficient new housing to meet the demands of a growing population whilst protecting sensitive habitats for wildlife is a challenge being faced nationally, and north Kent is no exception.

With excellent transport links to London and major ports and airports, over 2000 new homes are planned to be built each year in north Kent.



Research conducted on behalf of the North Kent Environmental Planning Group (NKEPG) in 2011¹ suggests that cumulatively these homes could have a considerable impact on the birds that winter here on the internationally recognized Special Protection Areas (SPA).

Further work was undertaken in 2013 and the North Kent Strategic Access Management and Monitoring Strategy² (SAMMS) identified a series of measures to mitigate the disturbance to birds caused by an increase in visitor numbers.

The North Kent SAMMS Project Board, a partnership of five Local Authorities, Ebbsfleet Development Corporation, with Natural England, Royal Society for the Protection of Birds, Kent Wildlife Trust and The Kent Developers Group, was set up in 2015 to deliver a strategic approach to mitigating disturbance caused by additional recreational visitors.

This Strategy sets out the measures that will be implemented to ensure that existing and new residents of north Kent are able to enjoy the coast responsibly, and that the bird populations continue to winter and breed here for generations to come.

Councillor Alan Jarrett
Chair, North Kent SAMMS Project Board

¹ Bird Disturbance Study, North Kent 2010/11. Footprint Ecology, 2011

² Thames, Medway & Swale Estuaries – Strategic Access Management and Monitoring Strategy. Footprint Ecology, 2014



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Background and Introduction

- 1.1 This Strategy has been produced by the North Kent Strategic Access Management and Monitoring Scheme (SAMMS) Board, a partnership of the following organisations: Kent Wildlife Trust, The Kent Developers Group, Natural England, Royal Society for the Protection of Birds (RSPB), Canterbury City Council, Ebbsfleet Development Corporation, Kent County Council, Gravesham Borough Council, Medway Council and Swale Borough Council.
- 1.2 Significant development is planned for north Kent with growing demand for new homes to accommodate the increasing population in the administrative areas of Canterbury, Dartford, Gravesham, Medway and Swale.
- 1.3 Each winter, the continuous swathe of coastal habitat from Gravesend to Whitstable plays home to thousands of wading birds and waterfowl. Because of this, the Thames, Medway and Swale estuaries comprise of three Special Protection Areas (SPAs). All of these are also listed as Ramsar sites due to the international significance of the wetland habitats.
- 1.4 With additional homes, the number of recreational visitors to the coastal areas will increase. Research has suggested that the increasing numbers of visitors will have a negative impact on designated bird species.
- 1.5 A strategic approach is required to deliver a series of measures to mitigate any disturbance to birds caused by increasing numbers of recreational visitors. This document details the evidence base supporting the need for mitigation, along with the measures being implemented to reduce any negative impact.
- 1.6 These strategic mitigation measures will be funded by developer contributions, applied to all new dwellings built within 6km of the SPAs. Some larger developments, or those closer to the SPA may require additional mitigation.
- 1.7 The Bird Wise objectives include:
 - Raising awareness of the importance of the SPAs in north Kent
 - To provide information on the birds that rely on the SPAs to survive
 - To prevent additional bird disturbance caused by recreational activities on the coast
 - To encourage visitors to enjoy the north Kent coast in a responsible manner.



Protected Areas in North Kent

- 2.1 The north Kent coast, between Gravesend and Whitstable, contains three SPAs and Ramsar¹ sites. These consist of the Thames Estuary and Marshes SPA, the Medway Estuary and Marshes SPA and the Swale SPA (see Map 1). The Medway Estuary and The Swale are also designated Marine Conservation Zones (MCZs).
- 2.2 The SPA classification is in accordance with the European Birds Directive. This requires Member States to classify sites that are important for bird species listed in Annex 1 of the Directive, which are rare or vulnerable, and also critically important sites for migration. Annex I of the Birds Directive lists 193 species and sub-species which are:
- in danger of extinction;
 - vulnerable to specific changes in their habitat;
 - considered rare because of small populations or restricted local distribution;
 - requiring particular attention for reasons of the specific nature of habitat.

For these species Member States must conserve their most suitable territories in number and size as Special Protection Areas.

- 2.3 All three of these sites are classified for their waders and waterfowl, both Annex 1 and migratory species. The designations provide protection for the significant numbers of wildfowl, waders and terns that overwinter or breed on the SPAs. The Thames, Medway and Swale Estuaries include mudflats, reedbeds, saltmarsh and grazing marsh, rich and diverse ecosystems that provide much needed food and high tide roosts for waders and wildfowl.
- 2.4 The coastal areas are popular with a variety of recreational users, including dog walkers, running groups and boating enthusiasts. The aim of this strategy is to encourage all visitors to use the coast responsibly through education and engagement.

¹ Convention on wetlands of international importance, especially as waterfowl habitat, Ramsar, Iran, 2/2/71, most commonly referred to as the 'Ramsar Convention'.



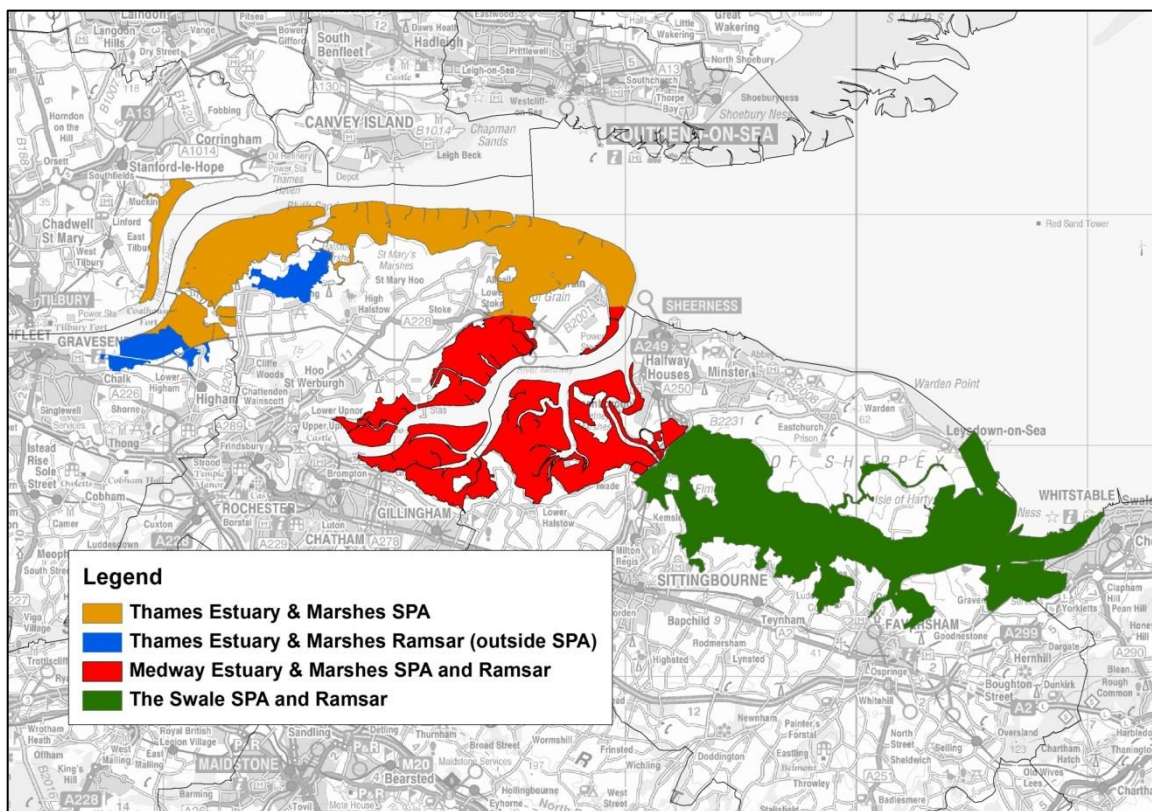
2.5 The National Planning Policy Framework (NPPF) para. 118 states:

‘The following wildlife sites should be given the same protection as European sites:

- *potential Special Protection Areas and possible Special Areas of Conservation;*
- *listed or proposed Ramsar sites; and*
- *sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.’*

Map 1

The Thames, Medway and Swale SPA and Ramsar Designated Sites



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The Case for Mitigation

- 3.1 Following the South East Plan allocation of around 70,000 houses between 2006 and 2026, across the north Kent area, concerns were raised about the potential impact of recreational disturbance on bird populations of the three SPA and Ramsar sites.
- 3.2 In response to this, the North Kent Environmental Planning Group (NKEPG) commissioned a number of reports to assess the current and future levels of recreational activity on the north Kent Marshes SPAs and Ramsar sites.
- 3.3 The NKEPG comprises of Canterbury, Dartford, Gravesham, Kent, Medway and Swale local authorities, together with Ebbsfleet Development Corporation, Natural England, Kent Wildlife Trust and RSPB.
- 3.4 Evidence base/ reports include:
 - Bird Disturbance Study, North Kent 2010/11 (Footprint Ecology);
 - What do we know about the birds and habitats of the North Kent Marshes? (Natural England Commissioned Report 2011);
 - North Kent Visitor Survey Results (Footprint Ecology 2011);
 - Estuary Users Survey (Medway Swale Estuary Partnerships, 2011);
 - North Kent Comparative Recreation Study (Footprint Ecology 2012);
 - Phase 1 – Bird Disturbance Report (Footprint Ecology 2012) and
 - Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy (Footprint Ecology 2014).
- 3.5 In summary, the Footprint Ecology Bird Disturbance Report¹ key findings were:
 - The number of birds using the three SPAs has declined markedly, in particular on the Medway at locations with the highest levels of access;
 - A potential cause of the declines is disturbance. The study found that the presence of people prompted the greatest response from birds;
 - Access levels are linked to local housing. It is not possible to rule out likely significant effects on the integrity of the protected sites as a result of increased housing;
 - The current main cause of disturbance is dog walking, and in particular when dogs are walked off the lead. Other activities that cause disturbance include cycling, jogging and those that involve people on the mudflats or the water;
 - Development within 6km of access points to the SPAs is particularly likely to lead to increased recreational visitors. Visitors to the north Kent coast mostly originate from a zone north of the M2/A2 between Gravesend and Herne;
 - People may visit from further afield but these users are likely to be drawn to the area for dedicated features. These include nature reserves, boating

¹ Liley, D, Lake, S. & Fearnley, H. (2012). Phase 1 – Bird Disturbance Report. Footprint Ecology/GGKM/NE



- activities and other watersports, bait digging and walking dogs off lead on the intertidal;
- Development beyond 6km, with the exception of large development schemes, could be screened out of assessments as it is assumed they are unlikely to have a significant effect on the protected sites;
 - Mitigation measures have been suggested, and are detailed later in this report. They focus on education, awareness raising, and site enhancements to promote responsible use of the sites and
 - Areas currently undisturbed, and in particular the main roost sites, should be protected from additional recreational pressure.
- 3.6 The health and wellbeing benefits that come from spending time on the Coast are well documented. This Strategy aims to promote responsible use of the coastal areas, and to change recreational visitors' behaviours to ensure that levels of bird disturbance do not increase.
- 3.7 Work is underway on the England Coast Path - a new National Trail around England's entire coast, which Natural England expects to complete in 2020.
- 3.8 There are four sections of the England Coast Path located within the north Kent marshes:
- Iwade to Grain – a 58km stretch of the Kent Coast expected to be ready in 2018;
 - Grain to Woolwich – a 78km stretch of the Kent Coast and Thames Estuary expected to be ready in 2019;
 - Isle of Sheppey – a 21km stretch of coast around the Isle of Sheppey expected to be ready in 2019 and
 - Whitstable to Iwade – a 58km stretch of the Kent Coast expected to be ready in 2018.
- 3.9 As part of this work a 'coastal margin' is being identified and can include all land between the trail and the sea. We will work with Natural England to ensure that careful consideration is given to sensitive sites that provide high tide roosts and feeding grounds for waders and waterfowl within the north Kent marshes.
- 3.10 A Trail Partnership is being set up to co-ordinate the management and promotion of the English Coastal Path in Kent and Sussex. Once the partnership is established we will engage with them to ensure that Bird Wise objectives and consistent messages are communicated.



What is Bird Disturbance?

- 4.1 Human disturbance to birds is essentially any activity that results in a change in a bird's behavior. A large volume of scientific literature and a wide range of studies consider the consequences of disturbance.
- 4.2 Depending on the nature, frequency and level of the disturbance, some birds may take flight temporarily, but return after the disturbance ends. Other birds may modify their feeding habits, whilst more sensitive species may suffer reduced breeding success or, ultimately, desert the site.
- 4.3 When a bird is forced to take flight, feeding ceases and energy expenditure greatly increases. At times of limited food supply and/or cold weather this could be life threatening for certain species.
- 4.4 Where disturbance causes a bird to leave a particular site, the availability of suitable alternative sites is critical for the bird's survival. The site in which it settles may already be populated or may be of lower quality resulting in lower rates of energy intake. This is especially critical in cases of major flight, when a bird flies further than 500 meters, as the energy spent in flight can be catastrophic for the bird.
- 4.5 In summary, the disturbance may result in:
 - Lack of feeding and resting time – which leads to deficiency in energy intake and overall fitness to migrate long distances or survive.
 - Deficient incubation period – which could decrease the breeding success of terns and cause population decline.



Mitigation Options

- 5.1 A number of mitigation measures were identified in the 2014 Footprint Ecology report, both essential and desirable. The measures that will be included in the north Kent scheme are detailed in this section.
- 5.2 All of the projects will be underpinned by a dedicated Bird Wise website containing information for developers, visitors, links to partner organisations, information on birds and other estuarine wildlife. Dedicated social media pages will be linked to the website and be regularly updated to ensure that the project provides ongoing information on events and activities.

Wardening / Visitor Engagement

- 5.3 The Bird Wise Rangers are fundamental to facilitating public engagement with the project.
- 5.4 Initially this will be one seasonal ranger employed over the winter. Their functions will include:
 - Familiarisation with the area and identification of disturbance issues;
 - Actively patrolling sensitive areas and engaging with visitors, often as the first point of contact between the public and Bird Wise North Kent;
 - Education initiatives with local schools;
 - Engagement with local organisations and volunteer groups and
 - Monitoring disturbance and the effectiveness of mitigation measures.
- 5.5 In time, the team will be increased to two seasonal rangers working over the winter. This will allow greater involvement in developing and delivering site specific enhancement works, liaison with stakeholders, reporting to project meetings and ensuring a greater presence on site to encourage long term changes to visitor behavior.

A North Kent Coast Dog Project

- 5.6 The disturbance study (Liley & Fearnley 2011) evidenced that dog walking accounted for 55% of major flight events recorded during the study period. Dogs that were off-lead were a particular problem.
- 5.7 Other authorities have worked with organisations, such as the Kennel Club, to introduce projects focusing on positive messages promote responsible dog ownership and encourage dog walking in less sensitive sites. Successful projects that deliver similar messages to Bird Wise include Dorset Dogs and Humber Hounds.
- 5.8 We will link to Local Authority projects that are already in existence, working with their dog wardens to engage with dog owners and dog walking businesses across north Kent.



- 5.9 Our own Bird Wise Ranger will provide face to face engagement with dog walkers to promote awareness of bird disturbance and information on how they can help to reduce their impact on birds. This will include day to day patrols of the SPA sites and attendance at local dog specific events (e.g. Paws in the Park, Dogfest).
- 5.10 The Bird Wise North Kent website will have a dedicated page detailing responsible behaviors, sites where dogs are welcome off-lead and information on areas to avoid. It can also include opportunities for engagement via social media and details of vets, pet suppliers, kennels etc.

Codes of Conduct

- 5.11 Codes of conduct will be developed in consultation with the various user groups that spend their leisure time on the north Kent estuaries and marshes. This includes dog walkers, runners, ramblers, horse riding and water based activities.
- 5.12 One code of conduct will be created to avoid any duplication or dilution of the key messages the project needs to convey. This will be available online and via social media platforms.
- 5.13 The key messages of the code of conduct will be available on a printed leaflet that will be available from the seasonal ranger and at key sites with high visitor numbers.

Site Specific Access and Infrastructure Enhancements

- 5.14 Several sites have been identified that could benefit from access and infrastructure enhancements. These include:
- Shorne Marshes and Fort
 - Cliffe Pools
 - Grain Foreshore
 - Lower Upnor
 - Copperhouse Marshes
 - Riverside Country Park
 - Otterham Creek
 - Bedlams Bottom
 - Elmley
 - Milton Creek
 - Conyer Creek
 - Oare Marshes
 - Seasalter Marshes
- 5.15 Enhancements can include improved signage and interpretation boards, screening of sensitive areas, footpath diversions and reviewing parking facilities. In particular, footpath diversions have the potential to make a

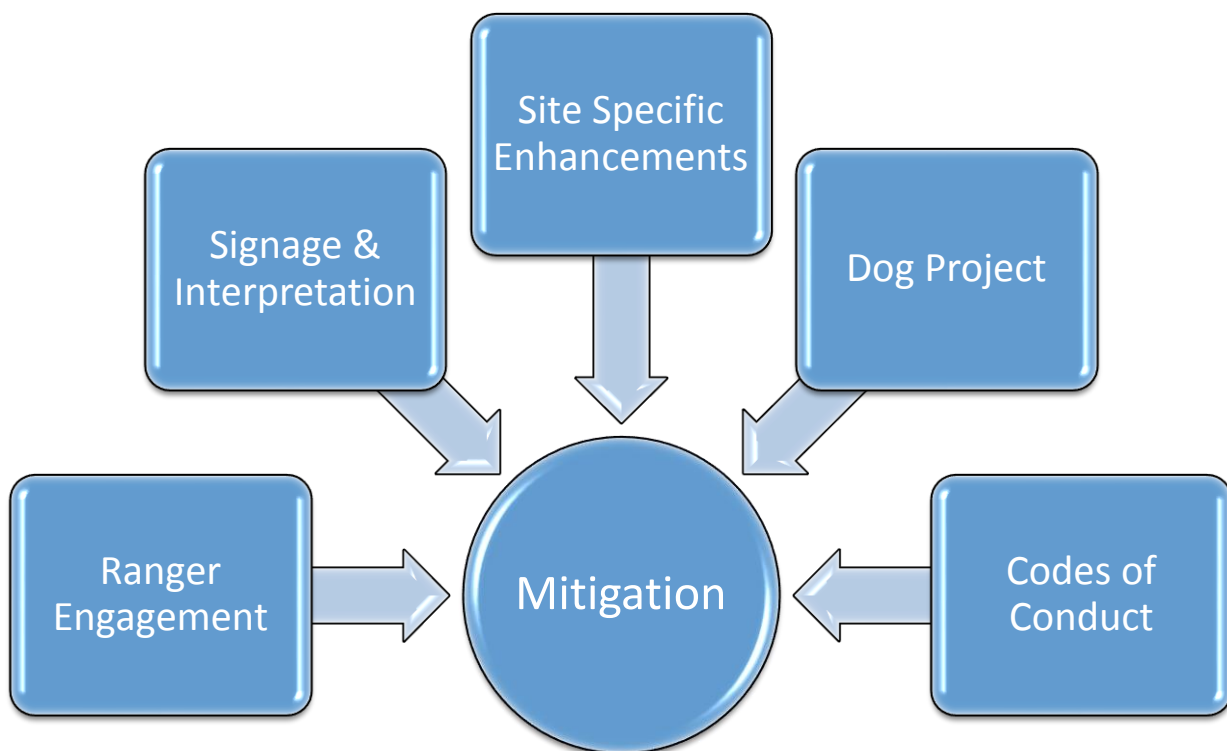


significant contribution towards mitigation measures in the prevention of bird disturbance.

- 5.16 Additional enhancements can be made at larger, more popular sites to provide fenced areas inland where dogs can be exercised off-lead without disturbance to birds on the shoreline.

Monitoring

- 5.17 Monitoring will be required to measure the success of the mitigation projects and determine whether adjustments are required. Annual monitoring will be undertaken by seasonal rangers, in addition to making use of the WeBS¹ counts that are carried out nationally.
- 5.18 External consultants will be engaged when full project monitoring is carried out. It is anticipated that this will be completed on a 5-yearly basis.



¹ WeBS is the Wetland Bird Survey, see Appendix 2



Funding

- 6 For the Bird Wise objectives to be delivered successfully, funding will be allocated to management, staffing, communications, equipment, projects and monitoring.
- 6.1 The Bird Wise projects will be funded via the tariff collected for new dwellings built within 6km of the SPA and Ramsar sites. The Bird Wise project could in part be funded by developments outside of the 6km distance if an impact is established.
- 6.2 The tariff is collected prior to commencement of development (or a phase of development) to enable mitigation measures to be in place prior to or close to first occupation. The development phasing is determined in the Section 106 agreements or the Unilateral Undertaking document.
- 6.3 The measures are required to mitigate the impact of new housing up to 2034 and for the duration of the life of the new dwellings. The ‘in-perpetuity’ period of 80 years will be funded by investing a percentage of the developer contributions received until 2034. As a guide, 40% of contributions received will be spent on mitigation measures and 60% will be invested for in-perpetuity funding.
- 6.4 The 2014 Footprint Ecology Report¹ costed a set of recommended mitigation measures to address disturbance impacts. The annual cost of these measures is detailed below:

Activity	Cost p/a	Notes
Head Ranger	£46,560	Includes on-costs
Seasonal Rangers x 2	£34,500	6 month posts includes on-costs
Operating Budget	£15,000	Web design, printing, communications, signage
Site Specific Projects	£20,000	Access management and improvements
Monitoring	£5,000	Annual accrual but full monitoring may only occur every 3-5 years
Management & Administration	£15,000	Paid to the accountable body to cover HR, ICT, financial support costs
Total Mitigation	£136,060	
In-perpetuity funding	£185,994	Calculated at 136.7% of annual mitigation costs
Total Annual Cost	£322,054	

¹ Liley, D. & Underhill-Day, J. (2013). Thames Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology

6.5 The scheme is designed to mitigate the impact of additional dwellings on the SPAs and can be scalable to take into account fluctuating levels of development. In essence, if less housing is delivered then less mitigation will be required and the schemes can be adjusted accordingly.

6.6 The tariff will be index linked in line with inflation and will be reviewed annually using the following formula:

$$\text{Indexed Sum} = \text{Initial Sum} \times \frac{\text{Inflation Index at Due Date}}{\text{Inflation Index at Base Date}}$$

6.7 The tariff was calculated using housing projections from Canterbury, Gravesham, Medway and Swale to provide a total number of new dwellings that will require mitigation until 2031. The total cost of providing this mitigation, allowing for this to continue in perpetuity, as suggested in the 2014 Footprint Ecology Report, provided an initial tariff of £223.58 per new dwelling.

6.8 New dwellings include those created under the General Permitted Development Order (including change of use from office to residential), and those created through the sub-division of existing dwellings.

6.9 Mitigation in relation to student accommodation, Houses in Multiple Occupation (HMOs), residential care homes, residential nursing homes, hotels, boarding and guest houses, hostels, holiday parks and all other residential institutions, will be considered on a case by case basis. Factors to consider will be proximity to the coastal areas, size of development and the likelihood of residents using the SPA for recreational activities. This is in keeping with advice received from Natural England in 2015.

6.10 Major developments outside of the 6km zone will need to be considered on a case by case basis, using the same factors discussed in the paragraph above.

6.11 Local Authorities will charge the tariff as follows:

Authority	Terms	Rate
Canterbury City Council	All new dwellings on commencement	
	1 bedroom	£127.08
	2 bedrooms	£178.67
	3 bedrooms	£240.78
	4+ bedrooms	£304.79
Gravesham Borough Council	All new dwellings on commencement	£223.58
Medway Council	All new dwellings on commencement	£223.58
Swale Borough Council	Developments of 10 or more dwellings on commencement	£281.00



Governance Arrangements

7.1 Bird Wise will be overseen on a strategic level by the Project Board. The Project Board will govern the development, implementation and commissioning of the Strategy. Membership of this board consists of the project partners as follows:

- Canterbury City Council (Councillor and Officer);
- Swale Borough Council (Councillor and Officer);
- Medway Council (Councillor and Officer);
- Gravesham Borough Council (Councillor and Officer);
- Ebbsfleet Development Corporation (Officer);
- Kent County Council (Officer);
- Royal Society for the Protection of Birds (Officer);
- Kent Wildlife Trust (Officer);
- The Kent Developers Group or an alternative appropriate development sector body (representative) and
- Any additional organisation which is employing staff on behalf of the Accountable Body (Officer).

7.2 Natural England will provide an advisory role to the Project Board, and will not have a voting role at the board meetings. Natural England will liaise with colleagues of the Environment Agency to coordinate technical advice on behalf of the wider governmental environmental bodies.

7.3 The Bird Wise Steering Group will comprise of an officer representative from each of the organisations mentioned above. The group will provide technical support to the Project Board and will produce reports for consideration. The Steering Group will work closely with the North Kent Environmental Planning Group, ensuring that Bird Wise objectives are consistent with other projects working in north Kent, and to enable joint working where possible.

7.4 Medway Council was appointed the Accountable Body for the North Kent SAMMS at the Project Board meeting on 30 August 2016. The role of the Accountable Body will be:

- To employ a Project Manager and other staff as agreed by the Project Board to establish and monitor the administration and operational procedures for Bird Wise;
- To hold and administer the funds collected by partner local authorities, and to provide advice and guidance on financial matters;
- To provide secretarial support to the Project Board and Steering Group;
- To action the commissioning of projects and survey work approved by the Project Board and monitor performance;
- To collate monitoring information to provide regular reporting on Bird Wise for the Steering Group and Project Board and
- To provide a financial protocol, this sets out the procedures for approving expenditure and for accounting for money handled by the Partnership.



- 7.5 The governance arrangements are captured in a Memorandum of Understanding document that was signed at the Project Board meeting in January 2018. This document covers the period 01 January 2018 to 31 December 2022.
- 7.6 The annual budget will be proposed by the Steering Group and agreed by the Project Board. An annual report will be produced, detailing measures implemented in the preceding year and progress made. It will also include details of spend to date and the budget for the coming year. This will be published once approved by the Project Board.



Communications & Marketing

8.1 The overarching aim of this Strategy is to reduce bird disturbance by encouraging behavioural change in coastal visitors. The approach will be positive engagement with visitors to raise awareness and create an understanding of the impacts that recreational visitors can cause to birds on the SPAs in north Kent.

8.2 A wide variety of people visit the north Kent coast for recreational purposes so our communication with them will need to be far reaching and targeted. Utilising a mixture of printed, digital and face to face methods will ensure that the Bird Wise messages are conveyed to as wide an audience as possible. This section of our Strategy details these methods.

Identifying the Audience

8.3 The background research conducted by Footprint Ecology between 2011 and 2014 identified recreational activity taking place on the estuarine coast as:

- Dog walking
- Walking without dogs
- Running / jogging / power walking
- Cycling
- Wildlife watching
- Fishing
- Bait digging / cockling / crab tilling
- Boating
- Family outing
- Wildfowling
- Photography
- Enjoying the scenery

8.4 Dog walking, in particular dogs off-lead, has been identified in the 2011 Bird Disturbance Report conducted by Footprint Ecology, as being responsible for the greatest number of major bird flights. Whilst Bird Wise will look to work with all recreational visitors to the coast, the greatest focus will need to be on visitors with dogs.

8.5 The introduction of parkrun in north Kent, at Shorne Woods Country Park in Gravesham, the Great Lines Heritage Park in Medway, at Milton Creek Country Park in Swale and at Whitstable has increased participation in running. This includes Canicross, the sport of running with dogs, with several groups forming in Kent. This has led to more people using the coast for both solo and organised runs, normally in areas with good parking and visitor facilities. We will engage with running clubs to raise awareness of disturbance issues and encourage them to use areas that are less sensitive.



Branding

- 8.6 The Bird Wise brand represents all of the activities of the North Kent SAMMS Project Board. It has been designed to focus on the core aims of the scheme whilst placing a level of responsibility on the audience.
- 8.7 It can be used in a variety of locations and when used with the tagline '*Wising up to bird disturbance*' it further emphasises the goal to raise awareness of bird disturbance issues.

Website

- 8.8 All of our activities will be underpinned by an informative, engaging and welcoming website. Information covered on the Bird Wise website will include:
- Home screen with basic information on the project and images from the SPAs
 - Links to partner organisations' websites
 - A page explaining bird disturbance & conservation
 - Images and information on the birds with links to RSPB pages
 - A page focusing on dog projects with information on dog friendly locations, businesses and events
 - Full Codes of Conduct aimed at specific user groups
 - The published Strategy document, business plan and annual reports
 - Frequently asked questions
 - Latest news – linking to Social Media updates
 - Links to all of the background research and reports
- 8.9 The website is designed to be a 'one stop shop' that provides information for developers, local authorities, recreational visitors and anybody that wants to know more about the Bird Wise projects.

Social Media

- 8.10 Communication via social media platforms will enable us to provide regular updates on activity, keeping the project live. These updates can be linked to show on the 'latest news' section of the main website, ensuring that the website contains current information.
- 8.11 Links to other similar organisations can be forged by following them, using tags and hashtags and sharing or retweeting posts. Interaction with these organisations will provide improve communication and encourage networking.
- 8.12 The use of Facebook, Twitter and Instagram will allow the Bird Wise projects to be interactive. We will do this by ensuring regular updates are posted by our rangers, encouraging visitors to post pictures they have taken when visiting the area and by holding photo competitions.
- 8.13 Many of our visitors use social media to organise their visits to the coast as part of a club or group. By interacting with these groups we can instantly share



the Bird Wise messages with them, and listen to any concerns or preferences that they have.

Ranger Engagement

- 8.14 The Bird Wise ranger team will provide the face to face engagement with visitors on site.
- 8.15 Their role will be one of educating and awareness raising rather than enforcement. Engaging in positive dialogue with visitors whilst offering information on the birds and advice on how to avoid disturbing them.
- 8.16 They will be provided with branded Bird Aware clothing and promotional material to reassure members of the public that they are being approached by a genuine organisation.
- 8.17 Targeted presentations can be given by the ranger and project manager to a variety of groups, clubs, local authorities and developer forums on request. This will allow any questions or fears to be addressed, providing positive reassurance that our aims are not to restrict activity but to promote more responsible behaviours.

Promotional Material

- 8.18 We recognise that not all of our visitors are using digital media and that some printed media will be required.
- 8.19 An information leaflet will be designed to provide a brief introduction to Bird Wise, along with pictures of the birds and code of conduct details. The aim of the leaflet is to spark initial interest and encourage the reader to find out more by visiting the website or following our social media accounts.
- 8.20 The leaflet will be handed out on site by Bird Wise rangers and will be available at visitor centres and other locations that provide facilities for recreational visitors on the coast, such as cafes and public houses.
- 8.21 The leaflet will also be offered to developers, for inclusion in the welcome packs they provide to people moving into new developments, within 6km of the SPAs.
- 8.22 In addition to the ranger patrols, we will attend relevant local shows and events to promote Bird Wise. Additional promotional materials will be required for this purpose, such as keyrings, dog tags, stickers, pens etc. These will be agreed by the Steering Group annually.



Measuring Success

9.1 New development will further exacerbate the existing disturbance issues to wintering and breeding birds on the north Kent marshes. The increase in recreational visitors to coastal sites is predicted to be approximately 15%. Robust solutions are required to ensure that this level of development does not have an adverse effect on the integrity of the SPA / Ramsar sites.

9.2 The aims of the Strategy are twofold:

- To support sustainable growth whilst safeguarding the integrity of the protected sites from impacts relating to recreational disturbance and
- To reduce the existing recorded recreational impact on bird populations on the protected sites to meet duties relating to the maintenance and restoration of the European sites, as required by Article 4(4) of the Birds Directive.

9.3 The Strategy will be deemed successful if the level of bird disturbance is not increased despite an increase in population and the number of recreational visitors to the coastal sites around the north Kent marshes.



Frequently Asked Questions

Q1: How does new housing in north Kent affect birds on the coast?

Every year, thousands of waders and wildfowl travel thousands of miles to over-winter in north Kent. This huge annual assemblage is internationally significant so the area is protected under International and European designations, the Thames, Estuary and Marshes SPA / Ramsar site, the Medway Estuary and Marshes SPA / Ramsar site, and The Swale SPA / Ramsar site. Recreational activity such as people walking with dogs off leads, cycling and jogging often disturbs the birds. The additional population from the building of new homes will mean an estimated 15% increase in recreational activity at the coast. Disturbance reduces the birds' feeding opportunities, meaning they have insufficient energy to survive the winter or to complete their migratory journey to their breeding sites, leading to a reduction in the bird population.

Q2: Why is there a need for mitigation measures?

The Conservation of Habitats and Species Regulations 2017 (known as the 'Habitats Regulations') set out how local planning authorities must deal with planning applications that have potential to impact on Special Protection Areas and other European protected sites. The legislation says that local planning authorities must not grant consent for a development that would, either alone or in-combination with other developments, have a likely significant effect on a European protected site, unless full mitigation is provided.

Q3: How can a developer provide mitigation?

Developers can provide mitigation by making a developer contribution to Bird Wise or by gathering their own evidence for a Habitat Regulations Assessment and implement the necessary mitigation measures in perpetuity. Bird Wise provides a way for new housing schemes to mitigate the impact of additional recreation on the north Kent SPA and Ramsar sites should the developer commit to paying the tariff set out by the Strategy. This makes it possible to conclude that a significant effect on the SPA or Ramsar site as a result of the development is unlikely and enables development to go ahead in compliance with the Habitats Regulations and enables developers to deal with the issue quickly and simply.

Alternatively, developers can gather their own evidence for a Habitats Regulations Assessment and implement the necessary bespoke mitigation measures in perpetuity (or demonstrate that none are required). Such an assessment would have to consider the impact of the proposal in combination with all other proposed development in north Kent. The cost of undertaking such assessment would be high and probably costlier than making a developer contribution to the implementation of Bird Wise. In most cases, it will not be viable for a development to provide its own bespoke mitigation package.

Q4: Which impacts are covered by Bird Wise?

The Strategy deals with the disturbance impact on birds caused by additional recreational visitors to the coast arising from the building of new homes within 6km of the three Special Protection Areas (SPAs) of the Thames Estuary, the Medway Estuary and the Swale.

Q5: My development is not on the coast, why do I need to provide mitigation?

The research undertaken by Footprint Ecology in 2012 found that 75% of coastal visitor travel 6km or less for their visit. This evidence showed that additional dwellings built within 6km of the three north Kent SPAs is likely to have a significant effect on them. Larger residential developments have a larger zone of influence and will be dealt with on a case by case basis. The 6km zone covers the northern parts of Gravesham, Medway and Swale, and the far western coastline of Canterbury.



Q6: Do all types of development need to provide mitigation?

A developer contribution is required for every net additional dwelling, including new dwellings created through the subdivision existing dwellings and new dwellings created as a result of approval granted under the General Permitted Development Order i.e changes of use to residential.

Q7: Is residential development allowed by permitted development covered?

Sections 73 to 77 of the Habitat Regulations explain the process for checking whether a Class O or other Permitted Development is likely to impact on a European wildlife site. If impact is likely, either alone or in-combination with other developments, then mitigation must be provided.

Q8: How much is the developer contribution?

The Thames, Medway and Swale Estuaries Strategic Access Management and Monitoring Strategy sets the contribution at £223.58 per dwelling. This figure provides funds for immediate delivery of the mitigation actions plus a contribution to an endowment. The Strategy states that this figure will be updated on 1 April each year in line with the Retail Price Index. Swale Borough Council are charging a higher rate but only applying it to developments of 10 or more dwellings. Canterbury City Council are charging on a stepped basis linked to the size of each dwelling. Full details are in the table below:

Authority	Terms	Rate
Canterbury City Council	All new dwellings on commencement	
	1 bedroom	£127.08
	2 bedrooms	£178.67
	3 bedrooms	£240.78
	4+ bedrooms	£304.79
Gravesham Borough Council	All new dwellings on commencement	£223.58
Medway Council	All new dwellings on commencement	£223.58
Swale Borough Council	Developments of 10 or more dwellings on commencement	£281.00

Some schemes, particularly those located close to the boundaries of the SPAs or Ramsar sites, may need to provide other mitigation measures in addition to making that financial contribution in order to ensure effective avoidance/mitigation of impacts on the sites. The local planning authority, with advice from Natural England, will consider the mitigation requirements for such development proposals on a case-by-case basis. Developers are encouraged to hold early discussions with the local planning authority on the mitigation needed for their scheme.

Q9: How can one new dwelling have any impact on the birds?

Every year a lot of single dwellings are built in north Kent and cumulatively these will have a significant impact. Legislation requires that the impact of individual developments must be assessed in combination with other development proposed around the SPAs and Ramsar sites.

Q10: When deciding on a planning application, is mitigation being considered by the planning authority?

The local planning authority will consider whether the proposed development is legally compliant with the Habitats Regulations.



Q11: Can I see how contributions are being spent?

An annual report will be produced each year, detailing the spend for the preceding year and the budget for the coming year. This will be published on our website at www.birdwise.org.uk

Q12: If the contribution isn't spent after a certain period of time, will it be returned?

No, the impacts of additional recreational disturbance require in perpetuity mitigation and therefore 57% of every developer contribution is ring fenced to guarantee the longevity of the Bird Wise mitigation strategy.

Q13: How will the Special Protection Areas that are derived under European law be affected when Britain leaves the European Union?

The legislation which safeguards SPAs around the country is embedded in UK law and it will remain after Britain ceases to be an EU Member. The Thames, Medway and Swale Estuaries are also internationally protected under the Ramsar Convention; this is independent of the UK's membership of the EU.

Q14: Why are so many organisations involved in the north Kent initiative?

The Habitats Regulations require the impact of one development to be assessed in combination with other developments, some of which will be in neighbouring authorities. Consequently, the four local authorities of north Kent worked together as a sub group of the North Kent Environmental Planning Group to produce the interim mitigation strategy. The four local authorities are: Canterbury, Gravesham, Medway and Swale. The Ebbsfleet Development Corporation is also responsible for determining planning applications in its area. Natural England, Kent County Council, The Kent Developers Group, the Royal Society for the Protection of Birds and the Kent Wildlife Trust are also members of the Partnership, this ensures a consistent message across similar projects being delivered in north Kent.

Q15: Is the Strategy only focused on wintering birds?

The Thames, Medway and Swale SPA and Ramsar sites are designated predominantly for the large, internationally significant numbers of waders and wildfowl that winter in north Kent and therefore the majority of actions and activities underpinning the Bird Wise mitigation strategy will be focused on wintering birds. However, there will be ongoing activity throughout the summer to ensure that the Bird Wise message is communicated all year round. Our aim is that increased awareness and behavioural changes encouraged by the Strategy will benefit bird populations and other estuarine wildlife throughout the year. We will also promote related projects being delivered by partner organisations throughout the summer months.



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Appendix 1 – SPA / Ramsar Site Specifications

	Medway	Swale	Thames
Area (Hectares)	4696.74	6515	5589
Number of overwintering waterfowl.	65,496 (5yr peak mean 1991/92-1995/96)	77,501 (5yr peak mean 1998/99-2002/03)	45,118 (5yr peak mean 1998/99-2002/03)

Scientific Name	Common Name	Medway	Swale	Thames	Status
<i>Anas acuta</i>	Pintail	x			Amber
<i>Anas clypeata</i>	Shoveler	x		x	Amber
<i>Anas crecca</i>	Teal	x	x		Amber
<i>Anas penelope</i>	Wigeon	x			Amber
<i>Anas platyrhynchos</i>	Mallard	x			Amber
<i>Anas strepera</i>	Gadwall		x	x	Amber
<i>Anser albifrons albifrons</i>	White-fronted Goose		x		Red
<i>Arenaria interpres</i>	Turnstone	x			Amber
<i>Aythya ferina</i>	Pochard	x			Red
<i>Branta bernicla bernicla</i>	Brent Goose	x	x		Amber
<i>Calidris alpina alpina</i>	Dunlin	x	x	x	Amber
<i>Calidris canutus</i>	Knot	x	x	x	Amber
<i>Charadrius hiaticula</i>	Ringed Plover	x	x	x	Red
<i>Circus cyaneus</i>	Hen Harrier	x		x	Red
<i>Cygnus columbianus bewickii</i>	Bewick's Swan	x			Amber
<i>Egretta garzetta</i>	Little Egret	x	x	x	Green
<i>Falco columbarius</i>	Merlin	x			Red
<i>Gavia stellata</i>	Red-Throated Diver	x			Amber
<i>Haematopus ostralegus</i>	Oystercatcher	x	x	x	Amber
<i>Limosa limosa islandica</i>	Black Tailed Godwit	x		x	Red
<i>Numenius arquata</i>	Curlew	x	x		Red
<i>Numenius phaeopus</i>	Whimbrel		x		Red
<i>Phalacrocorax carbo</i>	Cormorant	x	x		Green
<i>Philomachus pugnax</i>	Ruff		x	x	Red
<i>Pluvialis apricaria</i>	Golden Plover		x		Green
<i>Pluvialis squatarola</i>	Grey Plover	x	x	x	Amber
<i>Podiceps cristatus</i>	Great Crested Grebe	x			Green
<i>Recurvirostrata avosetta</i>	Avocet	x	x	x	Amber
<i>Sterna albifrons</i>	Little Tern	x	x		Amber
<i>Sterna hirundo</i>	Common Tern	x			Amber
<i>Tachybaptus fuscicollis</i>	Little Grebe		x	x	Green
<i>Tadorna tadorna</i>	Shelduck	x	x	x	Amber
<i>Tringa nebularia</i>	Greenshank	x	x	x	Amber
<i>Tringa totanus</i>	Redshank	x	x	x	Amber
<i>Vanellus Vanellus</i>	Lapwing	x	x		Red



Appendix 2 – WeBS Count Data

The Wetland Bird Survey (WeBS) monitors non-breeding waterbirds in the UK. The principal aims of WeBS are to identify population sizes, determine trends in numbers and distribution, and identify important sites for waterbirds.

WeBS is a partnership between the British Trust for Ornithology (BTO), the Royal Society for the Protection of Birds (RSPB) and the Joint Nature Conservation Committee (JNCC) in association with the Wildfowl and Wetlands Trust (WWT).

Using the most recent count data, alerts have been issued at all three SPAs in north Kent.

On the Medway Estuary, 17 species were evaluated and alerts were issued for Brent Goose (Dark-Bellied), Shelduck, Wigeon, Pintail, Great Crested Grebe, Cormorant, Ringed Plover, Grey Plover, Dunlin, Curlew, Redshank and Oystercatcher.

On the Swale Estuary, 21 species were evaluated and alerts were issued for White-fronted Goose (European), Little Grebe, Cormorant, Shelduck, Shoveler, Grey Plover, Lapwing, Dunlin and Redshank.

On the Thames Estuary, 14 species were evaluated and alerts were issued for White-fronted Goose (European), Grey Plover, Knot, Shoveler, Ringed Plover, Lapwing and Dunlin.

For three species on the Swale and Thames Estuaries, European White-fronted Geese, Grey Plover and Knot, comparison of site trend with broad scale trends suggests that the declines underpinning Alerts status may be driven by site-specific pressures. On the Medway Estuary, the situation was more serious with declines on all alert species being driven by site-specific pressures.

WeBS data is detailed in the following tables.



WeBS count data for the three SPAs showing the 5 year average figure for each species at each site.

WeBS Data Average Count (5 year average)							
Site	Species	2011-2016	2006-2011	2001-2006	1996-2001	1991-1996	1986-1991
Medway	Dark-bellied Brent Goose	1770	1303	1352	2218	4133	3015
	Shelduck	1735	1556	1724	3359	5900	4351
	Wigeon	1449	2094	2017	3760	4465	5428
	Teal	1557	1284	1162	1664	1882	2007
	Pintail	569	500	624	955	830	797
	Little Grebe	15	56	48	37	53	39
	Great Crested Grebe	53	33	42	50	120	186
	Cormorant	33	80	158	191	252	302
	Oystercatcher	1717	2195	2225	3947	4153	3301
	Avocet	1068	868	689	540	435	235
	Ringed Plover	107	150	176	371	1177	1174
	Grey Plover	223	977	1170	3106	3999	4281
	Lapwing	4770	4687	2210	10940	5040	1376
	Dunlin	5037	7853	6382	24877	25936	22908
	Black Tailed Godwit	1881	769	393	513	1470	1344
	Curlew	565	653	1142	1693	2083	2455
	Redshank	948	684	1174	2343	5844	5986

WeBS Count Average Count (5 year average)

Site	Species	2011-2016	2006-2011	2001-2006	1996-2001	1991-1996	1986-1991
Swale	White Fronted Goose	161	422	443	973	1418	1802
	Dark-Bellied Brent Goose	2731	1933	1628	2326	2135	2469
	Shelduck	909	1728	2159	2756	2628	1583
	Wigeon	11297	14277	17877	19316	12605	8719
	Gadwall	104	133	135	126	84	63
	Teal	3051	5704	5089	2954	2996	1964
	Pintail	230	572	831	550	942	428
	Shoveler	162	306	370	488	473	303
	Little Grebe	52	56	65	218	127	44
	Cormorant	149	94	122	169	197	257
	Oystercatcher	4650	4681	6082	5057	4028	3701
	Avocet	561	572	638	322	244	87
	Golden Plover	2380	10566	10032	8089	2643	977
	Grey Plover	1177	1614	1835	3262	2821	1566
	Lapwing	6215	12414	15304	15974	10466	8050
	Knot	2278	3967	3010	4993	4620	2679
	Dunlin	5928	8387	9880	11505	11383	13099
	Black Tailed Godwit	1687	1660	1435	1543	1558	689
	Bar Tailed Godwit	779	1147	613	632	622	322
	Curlew	897	1695	1502	1474	1904	1970
Redshank	1022	1202	1804	1474	1787	3103	

WeBS Count Average Count (5 year average)

Site	Species	2011-2016	2006-2011	2001-2006	1996-2001	1991-1996	1986-1991
Thames	Dark-Bellied Brent Goose	16968	15486	10230	12245	15750	20268
	Shelduck	1637	1915	2419	2844	2888	2518
	Gadwall	573	642	546	350	175	121
	Pintail	214	142	193	131	322	328
	Shoveler	639	426	495	299	186	220
	Little Grebe	431	412	350	215	252	77
	Avocet	2142	1666	1152	587	344	39
	Ringed Plover	832	849	1591	1274	1672	1223
	Grey Plover	4203	4099	6003	6565	6818	5801
	Lapwing	12737	11148	13973	14965	13298	7351
	Knot	33301	41133	31727	38910	44391	24310
	Dunlin	30949	28409	45759	39509	31513	27801
	Black Tailed Godwit	6380	5097	4013	1813	905	281
	Redshank	3175	3805	4653	4525	3912	5415

Appendix B3

Extract from Canterbury District Local Plan, adopted 2017

Policy **LB5** Sites of International Conservation Importance

Sites of international nature conservation importance must receive the highest levels of protection. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, alone or in combination with other plans or projects, as it would not be in accordance with the Habitat Regulations 2010 (as amended) and the aims and objectives of this Local Plan. Where a plan or project's effects on a SAC, SPA or Ramsar site, alone or in combination, cannot be screened out during Habitat Regulations Assessment as not likely to be significant, an Appropriate Assessment in line with the Habitats Regulations 2010 (as amended) will be required.

Any development (plan or project) considered likely to have a significant effect on a SAC, SPA or Ramsar site will need early consultation with Canterbury City Council and any other appropriate Statutory Consultee or authority as to the likely impacts and to identify appropriate mitigation as necessary. Where mitigation measures are agreed by the City Council, the development will be required to fund and/or implement such mitigation measures. Any residual impacts may still require in-combination assessment.

In the event that the City Council is unable to conclude that there will be no adverse effect on the integrity of any internationally designated site, the plan, or project will be refused unless the tests of no alternative sites and the imperative reasons of overriding public interest in accordance with Regulation 62 of the Habitats Regulations 2010 (as amended) are proven.

- 10.31** The City Council is committed to working with Natural England, other local authorities and groups to develop and implement a strategic approach to protecting international and European sites from the effects of development. In particular the City Council is seeking to agree a range of mitigation and access measures, where detrimental impact on sites of international importance is considered likely. The City Council believes that with the proper mitigation measures, the likelihood of a significant impact would be avoided.
- 10.32** The impact of recreational disturbance is considered a key concern for the coastal SPAs and evidence suggests that 'likely significant effects' on the SPA and Ramsar bird interest features cannot be ruled out from housing development. This potential impact is most efficiently mitigated at a strategic level, due to the in-combination nature of the impact and the distances from the development itself that the impacts can occur.

Appendix B4

Extract from Swale Borough Local Plan, adopted 2017

Policy CP 7**Conserving and enhancing the natural environment - providing for green infrastructure**

The Council will work with partners and developers to ensure the protection, enhancement and delivery, as appropriate, of the Swale natural assets and green infrastructure network and its associated strategy. Development proposals will, as appropriate:

1. Recognise and value ecosystems for the wider services they provide, such as for food, water, flood mitigation, disease control, recreation, health and well-being;
2. Protect the integrity of the existing green infrastructure network as illustrated by the Natural Assets and Green Infrastructure Strategy Map, having regard to the status of those designated for their importance as set out by Policy DM24 and Policy DM28;
3. Where assessment indicates that it is necessary to enhance and extend the network (including when management, mitigation and/or compensatory actions are required to address adverse harm), be guided by the Green Infrastructure Network and Strategy Map, prioritising actions toward identified Biodiversity Opportunity Areas;
4. Ensure that there is no adverse effect on the integrity of a SAC, SPA or Ramsar site, alone or in combination with other plan and projects, as it would not be in accordance with the aims and objectives of this Local Plan;
5. Require the completion of project specific Habitats Regulations Assessment, in accordance with Policy DM28, to ensure there are no likely significant effects upon any European designated site. For residential sites within 6km of an access point to any of the North Kent Marshes, development must contribute to its Strategic Access Management and Monitoring Strategy;
6. Contribute to the objectives of the Nature Partnerships and Nature Improvement Areas in Kent;
7. Make the enhancement of biodiversity and landscape as their primary purpose;
8. Promote the expansion of Swale's natural assets and green infrastructure, including within new and existing developments, by:
 - a. delivering a high standard of design quality to maximise the social, economic, health and environmental benefits of green infrastructure;
 - b. providing a focus for social inclusion, community development and lifelong learning;
 - c. taking into account the guidelines and recommendations of relevant management plans and guidance, Biodiversity Action Plans and Supplementary Planning Documents;
 - d. contributing to the protection, conservation and management of historic landscapes, archaeological and built heritage assets;
 - e. achieving, where possible, a net gain of biodiversity;
 - f. providing new recreational facilities in accordance with Policy DM17, exploiting opportunities to link urban and countryside areas and to create new footpath and cycle links;
 - g. taking account of and integrating with natural processes, such as flood risk and utilising sustainable urban drainage; and
 - h. including proposals to 'green' existing and proposed developed areas by increasing opportunities for nature in domestic gardens, streets and buildings, including street trees and in and around formal open spaces and sports provision.

7 Development management policies

a primary objective is to conserve or enhance biodiversity and will promote net gains in biodiversity where possible. The policy requires developers to use relevant supplementary planning documents to support and encourage the incorporation of biodiversity in and around developments.

Policy **DM 28**

Biodiversity and geological conservation

Development proposals will conserve, enhance and extend biodiversity, provide for net gains in biodiversity where possible, minimise any adverse impacts and compensate where impacts cannot be mitigated.

Part A. For designated sites

Development proposals will give weight to the protection of the following designated sites for biodiversity, as shown on the [Proposals Map](#), which will be equal to the significance of their biodiversity/geological status, their contribution to wider ecological networks and the protection/recovery of priority species as follows:

1. Within internationally designated sites (including candidate sites), the highest level of protection will apply. The Council will ensure that plans and projects proceed only when in accordance with relevant Directives, Conventions and Regulations. When the proposed development will have an adverse effect on the integrity of a European site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.
2. Within nationally designated sites (including candidate sites), development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests (either individually or in combination with other developments) unless the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the designated site that make it of national importance and any broader impacts on the national network of Sites of Special Scientific Interest. Where damage to a nationally designated site cannot be avoided or mitigated, compensatory measures will be sought. Development will also accord with and support the conservation objectives of any biodiversity site management plans;
3. Within locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site. Compensation will be sought for loss or damage to locally designated sites.

Part B: All Sites

Development proposals will:

1. Apply national planning policy in respect of the preservation, restoration and re-creation of:
 - a. the habitats, species and targets in UK and local Biodiversity Action Plans and Biodiversity Strategies;
 - b. linear and continuous landscape features or those acting as stepping-stones for biodiversity;
 - c. aged or veteran trees and irreplaceable habitat, including ancient woodland and traditional orchards;
2. Be informed by and further the guidelines and biodiversity network potential of the Council's Landscape Character and Biodiversity Assessment SPD;
3. Support, where appropriate, the vision and objectives of relevant environmental and biodiversity management and action plans;

4. Be accompanied by appropriate surveys undertaken to clarify constraints or requirements that may apply to development, especially where it is known or likely that development sites are used by species, and/or contain habitats, that are subject to UK or European law;
5. When significant harm cannot be avoided through consideration of alternative sites or adequate mitigation provided on-site or within the immediate locality, compensatory measures will be achieved within the relevant Biodiversity Opportunity Area, or other location as agreed by the Local Planning Authority;
6. Provide, where possible, a net gain of biodiversity overall; and
7. Actively promote the expansion of biodiversity within the design of new development and with reference to the wider natural assets and green infrastructure strategy in Policy CP7.

Woodlands, trees and hedges

7.7.80 The NPPF states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.^(7.74)

7.7.81 Trees, in particular ancient woodland and traditional orchards, are of high biodiversity value and can be irreplaceable. These habitats, along with scrub and fruit trees are also important to the local distinctiveness, visual amenity and biodiversity of Swale as well as contributing to a sense of wellbeing.

7.7.82 Ancient and replanted woodland in Swale stretches from the Blean and across the North Downs. Traditional orchards are found in the fruit belt of the Borough - which runs along the A2 corridor and stretches into the North Downs - as well as in isolated locations on the Isle of Sheppey. Scrub is often undervalued but is important as a habitat as well as a nursery for future woodland stocks. Many woodlands and old orchards in Kent are no longer used for timber/fruit products in a way that would otherwise ensure their positive long term management for flora and fauna. The Council is keen to support the innovative and sustainable use and management of woodlands for such activities as renewable energy, but also as a resource for education (e.g. forest/wild schools). Carefully planned appropriate development, the intended purpose of which is to further the sustainable management of woodland/old orchards, may be supported by the Council where in accordance with the Local Plan.

7.7.83 As well as the potential removal of woodland, development can threaten the sustainable management of woodland. This might be as a result of increased recreational pressures from new residents, the sub-division or lotting of woodland (or development associated with it), or the incorporation of woodland into residential curtilages. Such impacts will need to be assessed as part of a planning application and where the landscape and/or biodiversity interest of woodlands would be threatened, planning permission will be refused unless the benefits of development in that location clearly outweigh these concerns.

Appendix C

**Extract from Maidstone Local Plan Review (2021-38),
adopted 2024**

POLICY LPRSP14(A) - NATURAL ENVIRONMENT

1. To enable Maidstone borough to retain a high quality of living, protect and enhance the environment, and to be able to respond to the effects of climate change, developers will ensure that new development incorporates measures where appropriate to:
 - a. Deliver a minimum 20% biodiversity net gain on new residential development, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks. Biodiversity net gain should be calculated in accordance with the latest Natural England/DEFRA biodiversity metric or equivalent. Where 20% biodiversity net gain is demonstrated not to be financially viable, together with other policy costs, then the statutory minimum net gain provision will be secured;
 - b. Protect positive landscape character, including Landscapes of Local Value, areas of Ancient Woodland, veteran trees, trees with significant amenity value, important hedgerows, features of biological or geological interest, ecosystem services and the existing public rights of way network from inappropriate development and avoid significant adverse impacts as a result of development through the provision of adequate buffers and in accordance with national guidance;
 - c. Avoid damage to and inappropriate development considered likely to have significant direct or indirect adverse effects on:
 - i. Internationally, nationally and locally designated sites of importance for biodiversity (either within or beyond the borough); and
 - ii. Local Biodiversity Action Plan priority habitats and species;
 - d. If significant harm to habitats and biodiversity cannot be avoided, then the mitigation hierarchy should be followed:
 - i. Internationally, nationally and locally designated sites of importance for biodiversity (either within or beyond the borough); and
 - ii. Local Biodiversity Action Plan Priority habitats.
2. Regard shall be had to the forthcoming Design and Sustainability DPD which will provide further detail on the application of this policy.

3. Development proposals will control pollution to protect ground and surface waters where necessary and mitigate against the deterioration of water bodies and adverse impacts on Groundwater Source Protection Zones and principal aquifers, and incorporate measures to improve the ecological status of water bodies as appropriate; Major developments will not be permitted unless they can demonstrate that new or existing water supply, sewage and wastewater treatment facilities can accommodate the new development.
4. Wastewater treatment and supply infrastructure must be fit for purpose and meet all requirements of both the permitting regulations and the Habitats Regulations (for example in relation to nutrient neutrality at the Stodmarsh SAC/SPA/Ramsar site).
5. Development proposals will enhance, extend and connect habitats to enhance the borough's network of sites that incorporates designated sites of importance for biodiversity, priority habitats, Local Wildlife Sites and fragmented Ancient Woodland; support opportunities for the creation of new Biodiversity Action Plan priority habitats; create, enhance, restore and connect other habitats, including links to habitats outside Maidstone borough, where opportunities arise:
 - a. Provide for the long-term maintenance and management of all natural assets, including landscape character, associated with the development;
 - b. Mitigate for and adapt to the effects of climate change; and
 - c. Positively contribute to the improvement of accessibility of natural green space within walking distance of housing, employment, health and education facilities and to the creation of a wider network of new links between green and blue spaces including links to the Public Rights of Way network.
6. Where appropriate, development proposals will be expected to appraise the value of the borough's natural environment through the provision of the following:
 - a. An Ecological Impact Assessment of development sites and any additional land put forward for mitigation purposes to take full account of the biodiversity present, including the potential for the retention and provision of native plant species;
 - b. Arboricultural assessments to take full account of any natural assets connected with the development and associated sites; and

- c. A landscape and visual impact assessment to take full account of the significance of, and potential effects of change on, the landscape as an environmental resource together with views and visual amenity.
7. Any required publicly accessible open space should be designed as part of the overall green and blue infrastructure and layout of a site, taking advantage of the potential for multiple benefits including increased physical activity, enhanced play, wildlife, sustainable urban drainage, tree planting and landscape provision. The form and function of green and blue infrastructure will reflect a site's characteristics, nature, and location.
8. Development proposals will give weight to the protection of the following designated sites for biodiversity, as shown on the Policies Map, which will be equal to the significance of their biodiversity/geological status, their contribution to wider ecological networks and the protection/recovery of priority species as follows:
 - a. For internationally designated sites (SACs, SPAs, and Ramsar sites; including candidate sites), the highest level of protection will apply, as afforded by the Habitats Regulations 2017 (as amended);
 - b. Other than in exceptional circumstances (as set out in the Regulations), development will only be permitted where the council is satisfied that any necessary mitigation, management or monitoring measures are secured in perpetuity as part of the proposal and will be implemented in a timely manner, such that, in combination with other plans and development proposals, there will not be adverse effects on the integrity of a European site;
 - c. For nationally designated sites (including candidate sites), development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests (either individually or in combination with other developments) unless the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the designated site that make it of national importance and any broader impacts on the national network of Sites of Special Scientific Interest. Where damage to a nationally designated site cannot be avoided or mitigated, compensatory measures will be sought. Development will also accord with and support the conservation objectives of any biodiversity site management plans;
 - d. For locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only

where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site. Compensation will be sought for loss or damage to locally designated sites;

- e. Development in Lenham and Lenham Heath that would result in a net increase in population served by a wastewater system will need to ensure that it will not have an adverse effect on the integrity of Stodmarsh SAC/SPA/Ramsar site. Where a proposed development falls within the Stour Catchment (e.g. Lenham, east of Faversham Road), or where sewage from a development will be treated at a Waste Water Treatment Works that discharges into the river Stour or its tributaries, then applicants will be required to demonstrate that the requirements set out in the advice letter and accompanying methodology on Nutrient Neutrality issued by Natural England have been met. This will enable the council to ensure that the requirements of the Habitats Regulations are being met.
9. The council will work with Natural England to assess, monitor and if necessary, mitigate any recreation pressure at North Downs Woodland SAC.
10. Development proposals must support the council's nature conservation objectives and in doing so must not result in adverse effects on the integrity of the North Downs Woodland SAC. Any air pollution mitigation strategy will be developed and agreed with Natural England before the development commences and implemented prior to adverse effects on the integrity occurring; developer contributions will be used to support this where appropriate. The council is committed to ensuring that development within the borough will not contribute to adverse effects on the SAC due to air quality and will take the lead on coordinating any strategic mitigation required to minimise air pollution at the SAC.
11. Any development within 6km of the Medway Estuary and Marshes SPA and Ramsar will be required to make a financial contribution to mitigate against additional recreational impact arising from development.
12. Account should be taken of the council's Landscape Character Guidelines SPD, Green and Blue Infrastructure Strategy and the Kent Downs AONB Management Plan.
13. The council will work in partnership with landowners, land managers and developers to encourage better soil handling practices to avoid the degradation of soil and ensure soil functions are maintained as appropriate.

14. New development involving the creation of surface water runoff will be required to provide SuDS. Where possible, such SuDS will need to integrate with on-site blue-green infrastructure in order to increase biodiversity.

LPRSP14(B): Historic Environment

- 7.164 Maidstone borough has been shaped and influenced by its strong and rich cultural heritage. In addition to an extensive and important archaeological heritage from prehistory, Roman, Anglo-Saxon, and Medieval and later periods, the Borough contains an impressive and visible built heritage resource. In addition to Maidstone's industrial and military heritage, brewing, paper making and shipping along the Medway have been notable industrial influences. The borough's varied geology has been the source of locally distinctive building materials, namely Kentish ragstone, Wealden clay for brick and tile making, and oak from the Wealden forests used in the construction of timber-framed buildings and weather boarding.
- 7.165 The diversity of heritage assets is recognised through designations made at the national level by Historic England such as listed buildings, scheduled ancient monuments and registered parks and gardens. This is in addition to those identified more locally such as conservation areas, the parks and gardens included in the Kent Gardens Compendium, and locally listed buildings. The term 'heritage asset' is defined in the NPPF and, in addition to these 'designated' assets, encompasses features of more localised significance, so called 'non-designated' heritage assets.
- 7.166 Collectively these heritage assets contribute to the strong sense of place which exists across the borough. This historic inheritance also has wider economic, social, including health, and cultural benefits, particularly for Maidstone Town Centre. The Archbishop's Palace and Leeds Castle are two high-profile examples which help to drive tourism locally, while Mote Park is a registered historic park which both local residents and visitors' value highly as a popular recreational resource. Moreover, non-designated heritage assets play an important role in the historic character of the borough. Features such as buildings, traditional field enclosures and monuments are integral to the borough's high-quality landscape, particularly enjoyed by users of the extensive public rights of way network.
- 7.167 This rich historical resource is, however, vulnerable to damage and loss including of local skills. This is signified by the fact that heritage assets are inherently irreplaceable; once lost they are gone forever. Through the delivery of its local plan, and its wider activities, the council will act to record, conserve

- x. Home and flexible working supported by broadband infrastructure to encourage and enable people to drive less
- xi. Low emission strategy at south of site and through Boxley/Bredhurst.

Vision for Lidsing Garden Community

- 6.91 In 2057, Lidsing Garden Community will be an established and thriving new community with a distinctive local character, form and identity which provides strong linkages with the surrounding urban and rural services, facilities and communities and will serve to enhance the open space network of the Capstone Valley.
- 6.92 Lidsing Garden Community will be an exemplar urban extension containing 2,000 new homes that focuses on improving connectivity in south Medway. This connectivity will be in the form of a connection between North Dane Way and a new motorway junction on the M2. Routes across the site will be significantly improved and a new orbital bus route will benefit the wider community. Lidsing Garden Community will be a holistically planned new settlement which enhances the natural environment of its location in proximity to the Kent Downs National Landscape and its relationship with the Capstone Valley. The southern portion of the Capstone Valley will become a connecting point for a range of trips that will benefit existing and future residents linking Lordswood to the west with Hempstead to the east and creating strong leisure links north – south through the site connecting Capstone Country Park with the National Landscape.
- 6.93 This new Garden Community will change the character of this area, creating a new place within Medway with its own identity, unique but well-related to existing communities at Hempstead, Lordswood, and Bredhurst. It will be a settlement centred on a well-defined landscape infrastructure that links new places to live through an integrated leisure strategy that converges on a new local centre that provides retail, sporting, education and health facilities. Lidsing Garden Community will provide a genuinely landscape-led settlement which responds robustly to the challenges and opportunities of climate change, adopting models of best practice as an exemplar development.

POLICY LPRSP4(B) – LIDSING GARDEN COMMUNITY

The council will work with the promoter to produce an agreed Supplementary Planning Document to masterplan and facilitate the site's

delivery. The following criteria must be met in addition to other policies of this Local Plan:

1. Phasing and delivery

a. Starting no later than 2028:

Phase	Development	Indicative Complementary Infrastructure
Preliminary	N/A	<ul style="list-style-type: none"> • Access routes into development site Utility infrastructure capacity • Community engagement established and will be Ongoing. • Subject to Transport Assessment and Monitor and Manage Strategy, implement delivery of other supporting transport infrastructure that is necessary for this stage, including off-site junction mitigations.
(Phase 1) From which start date will be no later than 2028	Cumulative total: circa 590 homes (in first 5 years after commencement)	<ul style="list-style-type: none"> • Primary connections into the site and corresponding initial bus diversions • National Landscape – the structural planting to south of the Lidsing development area (adjacent to the motorway) will be approved as part of the SPD and later outline/hybrid application and this strategic landscaping shall be planted within this period. • Detailed approval of the mix of employment uses, building height and design shall be in place in line with the SPD. • Open space complementary to the 590 completed units in this phase to be delivered. • Proportionate secondary school contributions received. • During this stage the West-East link road will be

		<p>completed and will facilitate the full orbital bus route.</p> <ul style="list-style-type: none"> • Subject to Transport Assessment and Monitor and Manage Strategy, implement delivery of other supporting transport infrastructure that is necessary for this stage, including off-site junction mitigations.
(Phase 2) From 2033 to 2038	<p>Housing completions average 150 per annum</p> <p>New Local Centre</p>	<ul style="list-style-type: none"> • Completion of the M2 J4 spur, with possible interim utilisation of existing Maidstone Road bridge crossing to allow the employment development to commence early in this stage. • Subject to Transport Assessment and Monitor and Manage Strategy, implement delivery of off-site mitigations in Bredhurst and Boxley following consultation with local communities. • Towards the end of the stage and as necessitated by demand opening of replacement bridge crossing. • Ancient woodland enhancement secured • Proportionate Secondary school contribution received • 3FE Primary school land transferred and serviced for 3FE primary. Contributions to construct will be secured by Section 106 agreement in each phase. • Capstone Valley North-South open space/ pedestrian enhancement completed • Open space complementary to the completed residential units • Employment site commenced <p>Land transferred and serviced for new medical facility for GP surgery to be</p>

		<p>provided.</p> <ul style="list-style-type: none"> • Subject to Transport Assessment and Monitor and Manage Strategy, implement delivery of the supporting transport infrastructure that is necessary for this stage, including off-site junction mitigations.
By 2038	<p>Cumulative total: Minimum 1,340 homes</p> <p>14ha serviced employment site delivered</p>	<ul style="list-style-type: none"> • M2J4 National Landscape mitigation for the 19ha of land to the south of the M2 completed • Open space complementary to completed residential units delivered and meeting wider SPD phasing.
(Phase 3) By 2042	<p>Cumulative total: circa 2,000 homes</p>	<ul style="list-style-type: none"> • Open space complementary to completed residential units delivered and meeting wider SPD phasing • All of proportionate secondary school contributions received.

- b. A mix of sizes of land parcels should be provided to enable development by a range of types and sizes of developers;
- c. Ensure that environmental mitigations are delivered in advance of construction, and that requisite infrastructure is ready to operate upon occupation.

2. Housing

- a. 2,000 new homes in total, including 1,340 units within the plan period up to 2038;
- b. A target of 40% affordable housing;
- c. Range of housing typologies based on the council’s latest Strategic Housing Market Assessment, including across tenure, mix of sizes of units, including for generational living.

3. Masterplanning and design parameters

- a. Development will be based on the Masterplan vision framework plan (Figure 6.5);
- b. Development will proceed in accordance with a detailed design code agreed between the Local Planning Authority and promoter;
- c. Development of the site will be landscape-led to ensure that there are positive enhancements to the Capstone Valley and Kent Downs National Landscape setting;
- d. The overall utility of the Capstone Valley will be significantly enhanced including for recreation;
- e. The development will create a positive out-facing edge when viewed from the Medway urban area including Lordswood and Hempstead and the National Landscape to the south;
- f. Appropriate interfaces will be created with existing buildings which will be retained on and around the site to protect their significance;
- g. Design will reflect how the settlement's shape is configured with regards to its relationship to the Medway urban area, as well as the National Landscape and Bredhurst;
- h. The balance of land south of the M2 that is not used for highway infrastructure will be utilised for green infrastructure, including areas for public access, the details of which will be developed through the SPD masterplanning processes. Planning permission will be granted if the following criteria are met, and the submission is in accordance with the approved SPD:
 - i. The development proposals for employment uses will not exceed a total floorspace of 42,000 sqm and will respect the topography of the site by minimising the need for site excavation;
 - ii. Landscape buffers of at least 15 metres will be established along the site's boundary to the M2 motorway and the future management of landscaped areas will be secured by Section 106 agreement;
 - iii. A landscaped setting for the development and roads will be created alongside a strong internal landscaping framework within the employment development zones adjacent to the M2. These landscaped corridors will be multifunctional to create drainage and ecological corridors and recreational connections which will be

developed through the Supplementary Planning Document. This will include a green bridge connection across the motorway;

- iv. The maximum footprint of commercial buildings within the identified employment area shall not individually exceed 600m². The commercial building ridge heights shall not exceed 9 metres within the employment development zone (LCZ4);
- v. The employment buildings adjoining the M2 motorway shall stagger their siting with the majority of buildings sited "gable end on" to the motorway to increase the sense of separation between buildings and reduce the massing of the built form when viewed from the south;
- vi. The development proposals for employment buildings will through matters of detailing including lighting, materiality, siting of buildings and positioning of parking areas, alongside strategic and internal landscaping will ensure the development respects the sites visual and physical relationship with the Kent Downs National Landscape to the south of the M2 motorway and this will be developed through the Supplementary Planning Document;
- vii. Residential properties located nearest the National Landscape boundary shall be appropriate in height so as not to detrimentally impact the setting on the Kent Downs National Landscape. In the areas closest to the M2 within the zones referenced LCZ3and4 the building height would not exceed two storeys unless following a full LVIA assessment and taking into account the character area assessment and testing as part of the progression of the SPD it was considered appropriate to increase the height of selective buildings within this zone where agreed with the LPA and Kent Downs National Landscape Unit;
- viii. Residential densities will generally reduce toward the M2 motorway as informed by a master planning character area assessment and LVIA findings.

4. Employment/ Commercial

- a. Development should exceed 2,000 new jobs as feasible and viable due to the area's excellent connectivity to the Strategic Road Network;
- b. 14 hectares of new employment space will be created, focused on the improved motorway access;

- c. A new Local centre of no less than 1,500m² of retail, leisure and services will be created, strategically located on a new orbital bus route with good access to employment, Hempstead, and Lordswood.

5. Infrastructure

- a. A bespoke infrastructure funding agreement based on the value captured from the development, expected to be higher than that which would ordinarily be captured using a borough CIL approach, and should be spent on infrastructure locally, and in the surrounding areas where suitable;
- b. A new 3FE primary school within or adjacent to the local centre, and a contribution towards the creation of new secondary capacity in the Capstone Valley area;
- c. A comprehensive set of local infrastructure commensurate with a new community of 2,000 new homes, principally focused on the new local centre including a new medical facility;
- d. A full suite of open space will be delivered in accordance with policy LPRINF1. This would indicatively comprise the provision of open space typologies below, with further detail to be progressed through the SPD:
 - i. 3.33 hectares Amenity green space;
 - ii. 1.19 hectares play space;
 - iii. 7.6 hectares sports provision;
 - iv. 0.95 hectares of allotments;
 - v. 31 hectares natural/semi natural open space.

6. Transport connections

Prior to the first occupation of any floorspace or units on the development of a 'Vision and Validate' and 'Monitor and Manage Strategy' shall be submitted to and approved by the Local Planning Authority, in consultation with National Highways and KCC Highways. Thereafter, the approved framework shall be implemented until full completion of the development unless otherwise agreed by the Local Planning Authority, in consultation with National Highways and KCC Highways.

- a. A new connection to the M2 at Junction 4 will be created, enabling improved connections across the Capstone Valley and into Medway;
- b. A new bus service;
 - i. linking Lordswood and Hempstead, and linking to the Medway town centres;
 - ii. serving Boxley and Bredhurst, including exploring the potential for diversion through the site;
- c. New half-hourly bus services to be provided between the site and Chatham via North Dane Way;
- d. Cycling and Walking links throughout the site, and strategically north-south along the Capstone Valley and into the wider Medway area will be created;
- e. Priority, through design, throughout the site for vulnerable road users and active travel modes;
- f. Measures to prevent rat-running in local roads, including through Bredhurst and Boxley; and
- g. Routes identified as sites for potential mitigations will be subject to further assessment, and this will be undertaken via the Supplementary Planning Document and prior to any initial planning application. The assessment will include consideration of mitigations in Boxley, Bredhurst and on the A229 and A249 corridors as well as at M2 Junction 3 in accordance with the Monitor and Manage process set out in the IDP. Off-site highway improvements, some of which may be necessary in the Medway area, will be subject to further assessment and delivered in accordance with the development phasing provisions set out in (1)(a) above.

7. Environmental

- a. A climate change adaptations and mitigation strategy based on national and local guidelines;
- b. A minimum of 20% biodiversity net gain will be expected to be delivered on site;
- c. There are several areas of potential archaeological sensitivity across the site, and these should be surveyed and development should

respond to their significance and be informed by a heritage Impact Assessment;

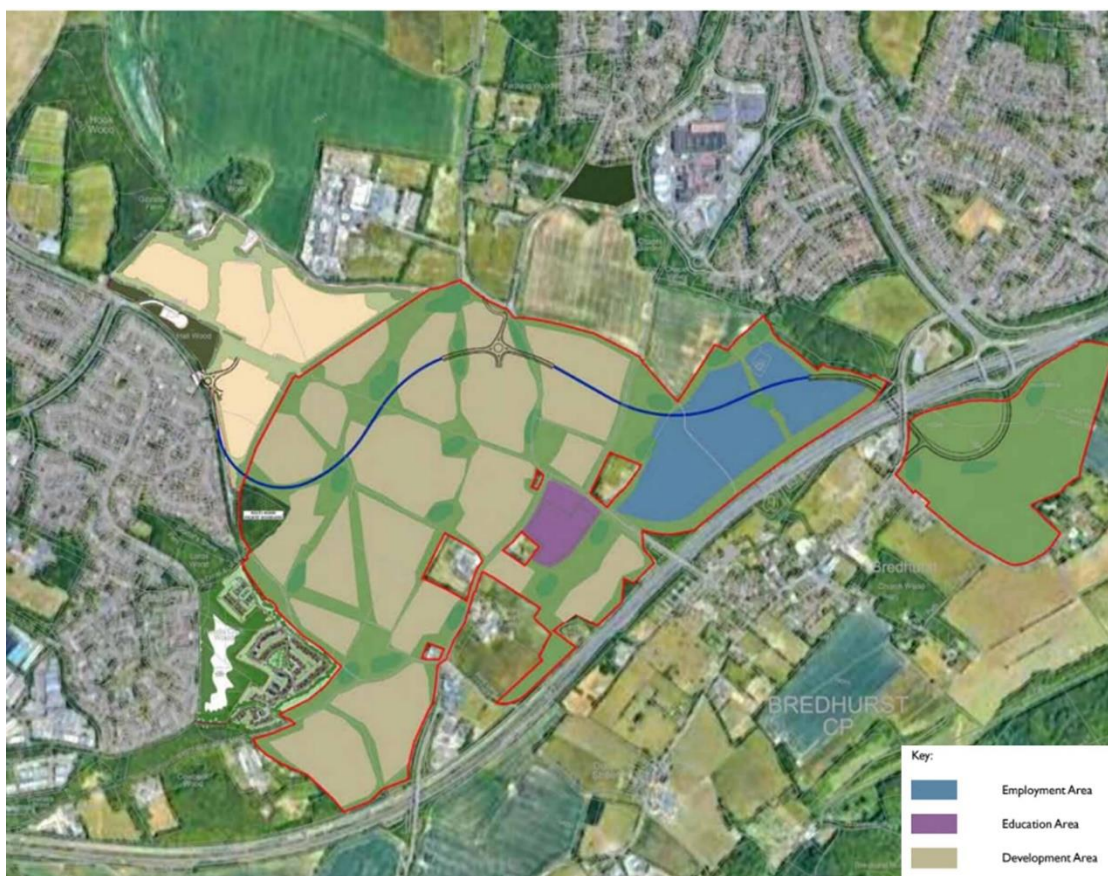
- d. Sustainable drainage methods are implemented to manage surface water flooding issues and ensure that flood risk is not exacerbated elsewhere including a site-wide Flood Risk Assessment will be required;
- e. Noise, and drainage and light pollution mitigation measures are integrated within the design;
- f. The development area has a rich and diverse heritage which presents unique opportunities and constraints. It will be important that key parts of the site are carefully designed to ensure appropriate conservation and enhancement of heritage assets to the benefit of the garden village community; their awareness, understanding and enjoyment of the special historic environment here. Heritage assets to be responded to within the site include site of a 20th century military balloon installation;
- g. A financial contribution shall be made to mitigate recreational impact on the Medway Estuary and Marshes SPA and Ramsar;
- h. Site design and layout shall be informed by a sensitive response to local historic assets and landscapes and appropriate buffering to ancient woodland and/or veteran trees; and
- i. Development proposals must demonstrate that the Lidsing garden community, either alone or in combination with other relevant plans and projects, will avoid adverse effects on the integrity of the North Downs Woodlands SAC, due to air quality, with reference to policy LPRSP14(A). Mitigation measures will be required where necessary and appropriate.

8. Governance arrangements will be set out identifying how:

- a. The 30-year vision will be fulfilled;
- b. The settlement will be community-managed;
- c. Maintenance of infrastructure, urban realm, and open spaces will be carried out;
- d. Roles for utilities and infrastructure operators;

- e. Revenues from development will be recycled within the site to meet the above requirements; and
- f. To ensure that key infrastructure such as public transport can be delivered in a timely manner as the settlement grows, including consideration of risks and actions to maintain their viability and deliverability.

Figure 6-5: Lidsing Garden Community Masterplan Vision Framework Plan



LPRSP5: Strategic Development Locations

6.94 The Local Plan 2017 has Broad Locations for growth at Maidstone Town Centre, Invicta Park Barracks, and Lenham. These locations have made, and will continue to make, an important contribution to growth within the plan period. Invicta Park Barracks and Lenham continue to be progressed and are set out in policies LPRSP5(B) and LPRSP5(C) below.

Appendix D

Classification of the policies within the submitted Plan and a classification to be requested as a main modification

Policy Reference & Title	Category in Submission Medway Local Plan 2041	Category to be Requested as Modification
Policy S1: Planning for Climate Change	Strategic	Strategic
Policy S2: Conservation and Enhancement of the Natural Environment	Strategic	Strategic
Policy S3: North Kent Estuary and Marshes Designated Sites	Strategic	Strategic
Policy S4: Landscape Protection and Enhancement	Strategic	Strategic
Policy S5: Securing Strong Green and Blue Infrastructure	Strategic	Strategic
Policy S6: Kent Downs National Landscape	Strategic	Strategic
Policy DM1: Flood and Water Management	Development Management	Non-strategic
Policy DM2: Contaminated Land	Development Management	Non-strategic
Policy DM3: Air Quality	Development Management	Non-strategic
Policy DM4: Noise and Light Pollution	Development Management	Non-strategic
Policy S7: Green Belt	Strategic	Strategic
Policy T1: High Quality Design and Amenity	Thematic	Strategic
Policy DM5: Housing Design	Development Management	Non-strategic
Policy DM6: Sustainable Design and Construction	Development Management	Non-strategic
Policy DM7: Shopfront Design and Security	Development Management	Non-strategic
Policy DM8: Advertisements	Development Management	Non-strategic
Policy S8: Historic Environment	Strategic	Strategic
Policy DM9: Heritage Assets	Development Management	Non-strategic
Policy S9: Star Hill to Sun Pier	Strategic	Non-strategic
Policy DM10: Conservation Areas	Development Management	Non-strategic
Policy DM11: Scheduled Monuments and Archaeological Sites	Development Management	Non-strategic
Policy T2: Housing Mix	Thematic	Strategic
Policy T3: Affordable Housing	Thematic	Strategic
Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation	Thematic	Strategic
Policy T5: Student Accommodation	Thematic	Strategic
Policy T6: Mobile Home Parks	Thematic	Non-strategic
Policy T7: Houseboats	Thematic	Non-strategic
Policy T8: Houses of Multiple Occupation	Thematic	Non-strategic
Policy T9: Self-build and Custom Housebuilding	Thematic	Non-strategic
Policy T10: Gypsy, Travellers & Travelling Showpeople	Thematic	Strategic
Policy T11: Small Sites and SME Housebuilders	Thematic	Non-strategic
Policy S10: Economic Strategy	Strategic	Strategic
Policy S11: Existing Employment Provision	Strategic	Non-strategic
Policy S12: New Employment Sites	Strategic	Non-strategic
Policy T12: Learning and Skills Development	Thematic	Strategic
Policy T13: Tourism, Culture and Visitor Accommodation	Thematic	Strategic
Policy S14: Supporting Medway's Culture and Creative Industries	Strategic	Strategic
Policy T14: Rural Economy	Thematic	Non-strategic
Policy S15: Town Centres Strategy	Strategic	Strategic
Policy S16: Hierarchy of Centres	Strategic	Strategic
Policy T15: Sequential Assessment	Thematic	Non-strategic
Policy T16: Ancillary Development	Thematic	Non-strategic
Policy T17: Impact Assessment	Thematic	Non-strategic
Policy S17: Chatham Town Centre	Strategic	Strategic
Policy S18: Rochester District Centre	Strategic	Non-strategic
Policy S19: Gillingham District Centre	Strategic	Non-strategic
Policy S20: Strood District Centre	Strategic	Strategic
Policy S21: Rainham District Centre	Strategic	Non-strategic
Policy S22: Hoo Peninsula	Strategic	Strategic
Policy S23: Hempstead Valley District Centre	Strategic	Non-strategic
Policy DM12: Local and Rural Centres	Development Management	Non-strategic
Policy T18: Shopping Parades and Neighbourhood Centres	Thematic	Non-strategic
Policy T19: Meanwhile Uses	Thematic	Non-strategic
Policy DM13 Medway Valley Leisure Park	Development Management	Non-strategic
Policy DM14: Docksides	Development Management	Non-strategic
Policy DM15: Monitoring and Managing Vehicle Trip Generation	Development Management	Non-strategic
Policy T20: Riverside Path	Thematic	Non-strategic
Policy DM16: Chatham Waters Line	Development Management	Non-strategic
Policy DM17: Grain Branch	Development Management	Non-strategic
Policy T21: Riverside Infrastructure	Thematic	Non-strategic
Policy T22: Marinas and Moorings	Thematic	Non-strategic
Policy T23: Aviation	Thematic	Non-strategic
Policy T24: Urban Logistics	Thematic	Non-strategic
Policy T25: User Hierarchy and Street Design	Thematic	Non-strategic
Policy T26: Accessibility Standards	Thematic	Non-strategic
Policy DM18: Transport Assessments, Transport Statements and Travel Plans	Development Management	Non-strategic
Policy DM19: Vehicle Parking	Development Management	Non-strategic
Policy DM20: Cycle Parking and Storage	Development Management	Non-strategic
Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing	Thematic	Strategic
Policy T28: Existing Open space, Outdoor Sports and Play Spaces	Thematic	Non-strategic
Policy DM21: New Open Space, Outdoor Sports and Play Spaces	Development Management	Non-strategic
Policy T29: Community and Cultural Facilities	Thematic	Strategic
Policy S24: Infrastructure delivery	Strategic	Strategic
Policy DM22: Digital Communications	Development Management	Non-strategic
Policy T30: Safeguarding Mineral Resources	Thematic	Strategic
Policy T31: Safeguarding of Existing Mineral Supply Infrastructure	Thematic	Strategic
Policy T32: Supply of Recycled and Secondary Aggregates	Thematic	Non-strategic
Policy T33: Extraction of Land Won Minerals	Thematic	Non-strategic
Policy DM23: Waste Prevention	Development Management	Non-strategic
Policy T34: Safeguarding of Existing Waste Management Facilities	Thematic	Strategic
Policy T35: Provision of Additional Waste Management Capacity	Thematic	Strategic
Policy T36: Location of Waste Management Facilities	Thematic	Strategic
Policy T37: Other Recovery	Thematic	Strategic
Policy T38: Non-inert Landfill	Thematic	Strategic
Policy T39: Beneficial Use of Inert Waste by Permanent Deposit	Thematic	Strategic
Policy T40: Wastewater Treatment	Thematic	Non-strategic
Policy S25: Energy Supply	Strategic	Strategic
Policy T41: Heat Networks	Thematic	Non-strategic
Policy SA1: Chatham Town and Surrounds	Site Allocations	Non-strategic
Policy SA2: Heritage-led Sites	Site Allocations	Non-strategic
Policy SA3: Gillingham District Centre	Site Allocations	Non-strategic
Policy SA4: River Waterfront	Site Allocations	Non-strategic
Policy SA5: Strood Town centre and Surrounds	Site Allocations	Non-strategic
Policy SA6: Land West of Strood	Site Allocations	Non-strategic
Policy SA7: Capstone Valley	Site Allocations	Non-strategic
Policy SA8: Hoo St Werburgh and Chattenden	Site Allocations	Non-strategic
Policy SA9: High Halstow	Site Allocations	Non-strategic
Policy SA10: Lower Rainham	Site Allocations	Non-strategic
Policy SA11: Rural Settlements	Site Allocations	Non-strategic
Policy SA12: Other sites	Site Allocations	Non-strategic
Policy SA13: Frindsbury Peninsula Opportunity Area	Site Allocations	Non-strategic
Policy SA14: Employment Sites	Site Allocations	Non-strategic

Appendix E

Table of Regulation 19 and Regulation 22 documents

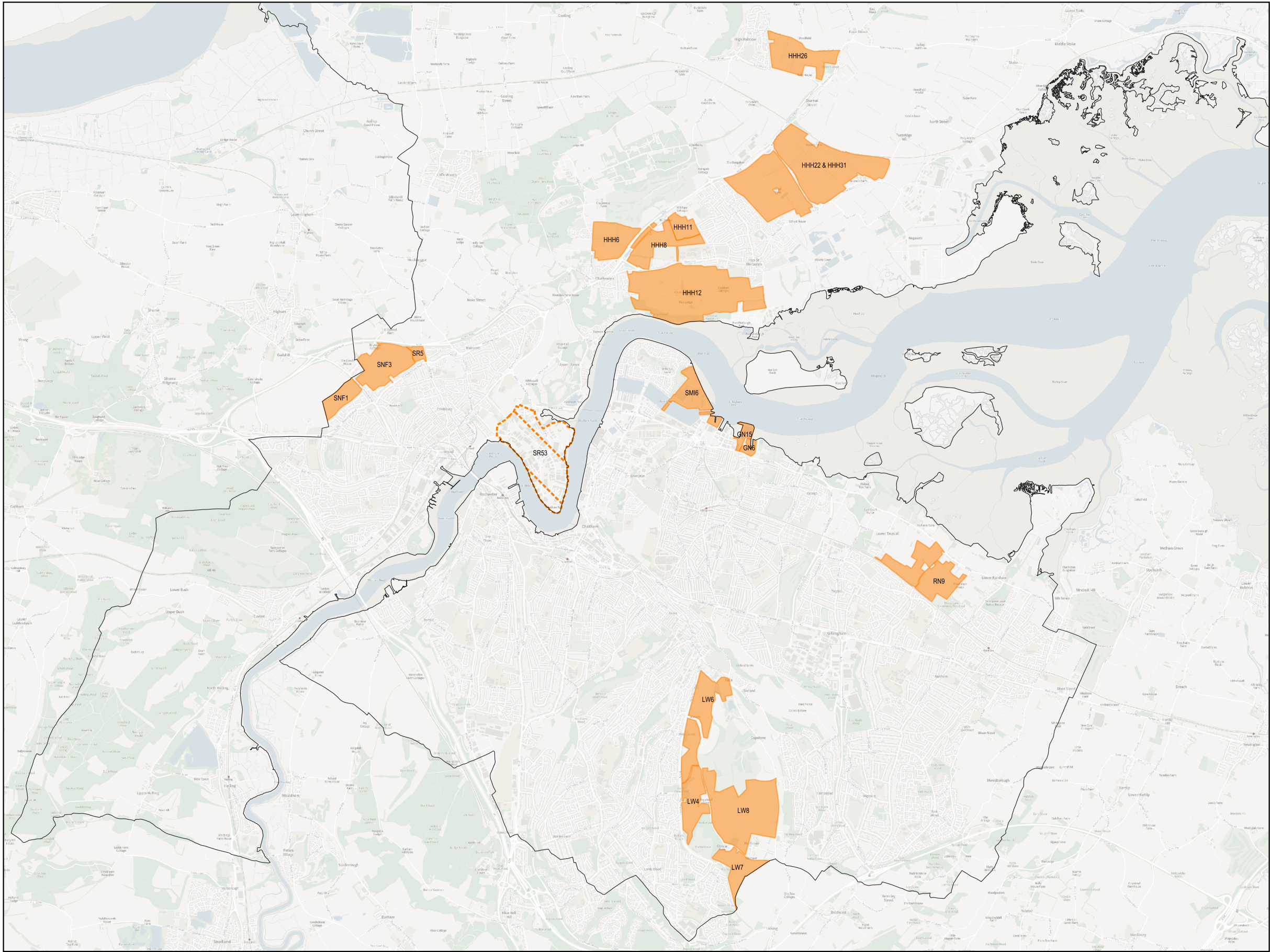
EXAMINATION LIBRARY CATEGORY	REFERENCE	DOCUMENT TITLE	DATE OF DOCUMENT	AVAILABLE AT REGULATION 19 - MLP/ED4	AVAILABLE AT REGULATION 19 - MEDWAY COUNCIL	MEDWAY COUNCIL'S NOTES
A. CORE SUBMISSION DOCUMENTS	A1	A1 Submission Medway Local Plan 2041			Yes	
A. CORE SUBMISSION DOCUMENTS	A2.1	A2.1 Submission Policies Map - Urban Core			Yes	
A. CORE SUBMISSION DOCUMENTS	A2.2	A2.2 Submission Policies Map - North West			Yes	
A. CORE SUBMISSION DOCUMENTS	A2.3	A2.3 Submission Policies Map - North East			Yes	
A. CORE SUBMISSION DOCUMENTS	A2.4	A2.4 Submission Policies Map - South West			Yes	
A. CORE SUBMISSION DOCUMENTS	A2.5	A2.5 Submission Policies Map - South East			Yes	
A. CORE SUBMISSION DOCUMENTS	A3.1	A3.1 Sustainability Appraisal - Volume 1 of 3 - Non-technical Summary			Yes	
A. CORE SUBMISSION DOCUMENTS	A3.2	A3.2 Sustainability Appraisal - Volume 2 of 3 - Regulation 19 Report			Yes	
A. CORE SUBMISSION DOCUMENTS	A3.3	A3.3 Sustainability Appraisal - Volume 3 of 3 - Appendices			Yes	
A. CORE SUBMISSION DOCUMENTS	A4.1	A4.1 Submission Habitats Regulations Assessment		No	No	Interim Habitats Regulations Assessment (June 2025) was available at Regulation 19
A. CORE SUBMISSION DOCUMENTS	A4.2	A4.2 Submission Habitats Regulations Assessment - Air Quality Modelling for Ecology Assessment		No	No	
A. CORE SUBMISSION DOCUMENTS	A4.3	A4.3 Submission Habitats Regulations Assessment - Interpretation of Air Quality Modelling Data		No	No	
A. CORE SUBMISSION DOCUMENTS	A5	A5 Submission Letter to Planning Inspectorate			n/a	
A. CORE SUBMISSION DOCUMENTS	A6	A6 Notice of Submission to Secretary of State (Document to follow)			n/a	
A. CORE SUBMISSION DOCUMENTS	A7.1	A7.1 Pre-Examination Checklist			n/a	
A. CORE SUBMISSION DOCUMENTS	A7.2	A7.2 Planning Inspectorate's Response to Pre-Examination Checklist			n/a	
A. CORE SUBMISSION DOCUMENTS	A8	A8 Local Development Scheme			Yes	
A. CORE SUBMISSION DOCUMENTS	A9	A9 Statement of Community Involvement			Yes	
A. CORE SUBMISSION DOCUMENTS	A10.1	A10.1 Consultation Statement (including appendices 1 to 5)			n/a	
A. CORE SUBMISSION DOCUMENTS	A10.2	A10.2 Consultation Statement - Appendix 6			n/a	
A. CORE SUBMISSION DOCUMENTS	A10.3	A10.3 Schedule of Representations Received under Regulation 20			n/a	
A. CORE SUBMISSION DOCUMENTS	A11	A11 Duty to Cooperate Statement			No	
A. CORE SUBMISSION DOCUMENTS	A12.1	A12.1 Statement of Common Ground with Prescribed Bodies			No	
A. CORE SUBMISSION DOCUMENTS	A12.2	A12.2 Statement of Common Ground with National Highways			No	
A. CORE SUBMISSION DOCUMENTS	A12.3	A12.3 Statement of Common Ground with Maidstone Borough Council			No	
A. CORE SUBMISSION DOCUMENTS	A12.4	A12.4 Statement of Common Ground with Kent County Council - Waste Management and Minerals Supply			No	
A. CORE SUBMISSION DOCUMENTS	A12.5	A12.5 Initial Proposed Statement of Common Ground with Thurrock Council			No	
A. CORE SUBMISSION DOCUMENTS	A13	A13 Diversity Impact Assessment			Yes	
A. CORE SUBMISSION DOCUMENTS	A14	A14 Monitoring Framework			No	
A. CORE SUBMISSION DOCUMENTS	A15.1	A15.1 Authority Monitoring Report 2025 - Volume 1			n/a	Published annually
A. CORE SUBMISSION DOCUMENTS	A15.2	A15.2 Authority Monitoring Report 2025 - Volume 2			n/a	Published annually
B. EVIDENCE BASE	B1	B1 Land Availability Assessment	June 2025		Yes	
B. EVIDENCE BASE	B2	B2 Infrastructure Delivery Plan (December 2025)	December 2025	No	No	Infrastructure Delivery Plan (June 2025) was available at Regulation 19
B. EVIDENCE BASE	B3	B3 Village Infrastructure Audit	June 2025		Yes	
B. EVIDENCE BASE	B4	B4 Developer Contributions and Obligations Guide (December 2025)	December 2025	No	No	Previous iteration of Developer Contributions and Obligations Guide was available at Regulation 19
B. EVIDENCE BASE	B5	B5 Viability Assessment (June 2025)	June 2025		Yes	
B. EVIDENCE BASE	B6.1	B6.1 Strategic Flood Risk Assessment - Level 1 (November 2025)	November 2025	No	No	Strategic Flood Risk Assessment - Level 1 (May 2025) was available at Regulation 19
B. EVIDENCE BASE	B6.2	B6.2 Strategic Flood Risk Assessment - Level 1 (November 2025) - Appendices	9 October 2025	No	No	
B. EVIDENCE BASE	B6.3	B6.3 Strategic Flood Risk Assessment - Level 2 (November 2025)	November 2025	No	No	Strategic Flood Risk Assessment - Level 2 (May 2025) was available at Regulation 19
B. EVIDENCE BASE	B6.4	B6.4 Strategic Flood Risk Assessment - Level 2 (November 2025) - Appendices	18 June 2025	No	No	
B. EVIDENCE BASE	B6.5	B6.5 Strategic Flood Risk Assessment - Sequential Test Report	November 2025		No	Strategic Flood Risk Assessment - Sequential Test Report (May 2025) was available at Regulation 19
B. EVIDENCE BASE	B7	B7 Landscape Character Assessment	June 2024		Yes	
B. EVIDENCE BASE	B8	B8 Green Belt Review	June 2025		Yes	
B. EVIDENCE BASE	B9	B9 Heritage Asset Review	December 2025		Yes	
B. EVIDENCE BASE	B10	B10 Local Housing Needs Assessment	February 2025		Yes	
B. EVIDENCE BASE	B11.1	B11.1 Gypsy and Traveller Accommodation Assessment	May 2024		Yes	
B. EVIDENCE BASE	B11.2	B11.2 Gypsy and Traveller Accommodation Assessment - Addendum	11 June 2025		Yes	
B. EVIDENCE BASE	B12	B12 Employment Land Needs Assessment	February 2025		Yes	
B. EVIDENCE BASE	B13	B13 Retail and Town Centres Study	June 2025		Yes	
B. EVIDENCE BASE	B14	B14 Chatham Design Code	June 2024		Yes	Published at https://www.medway.gov.uk/chathamdesigncode
B. EVIDENCE BASE	B15	B15 Chatham Town Centre Masterplan and Delivery Strategy	November 2019		Yes	Published at https://www.medway.gov.uk/downloads/download/32/local_plan_evidence_base
B. EVIDENCE BASE	B16	B16 Gillingham Town Centre Masterplan and Delivery Strategy	November 2019		Yes	Published at https://www.medway.gov.uk/downloads/download/32/local_plan_evidence_base
B. EVIDENCE BASE	B17	B17 Strood Town Centre Masterplan and Delivery Strategy	December 2019		Yes	Published at https://www.medway.gov.uk/downloads/download/32/local_plan_evidence_base
B. EVIDENCE BASE	B18.1	B18.1 Strategic Transport Assessment - Forecasting Report	15 December 2025	No	No	Previous iteration of Forecasting Report was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.2	B18.2 Strategic Transport Assessment - Mode Shares and Trip Rate Assessment Tool	31 January 2025		Yes	
B. EVIDENCE BASE	B18.3	B18.3 Strategic Transport Assessment - Mode Share Strategy	29 May 2025		Yes	
B. EVIDENCE BASE	B18.4	B18.4 Strategic Transport Assessment - Merge and Diverge Assessment	16 December 2025	No	No	Previous iteration of Merge and Diverge Assessment was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.5	B18.5 Strategic Transport Assessment - M2 Junction Analysis Technical Note	15 December 2025	No	No	Previous iteration of M2 Junction Analysis Technical Note was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.6	B18.6 Strategic Transport Assessment - Proportionality Assessment	15 December 2025	No	No	Previous iteration of Proportionality Assessment was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.7	B18.7 Strategic Transport Assessment - Junction Modelling and Mitigation Report	15 December 2025	No	No	Previous iteration of Junction Modelling and Mitigation Report was available at Regulation 19. Latest iteration addressed comments received from National Highways at Regulation 19.
B. EVIDENCE BASE	B18.8.1	B18.8.1 Strategic Transport Assessment - M2 Junction 1 Design Review	Winter 2025		No	
B. EVIDENCE BASE	B18.8.2	B18.8.2 Strategic Transport Assessment - M2 Junction 1 Safety Review	21 October 2025	No	No	
B. EVIDENCE BASE	B18.8.3	B18.8.3 Strategic Transport Assessment - M2 Junction 1 Cost Estimate Report	30 October 2025	No	No	
B. EVIDENCE BASE	B18.9	B18.9 Strategic Transport Assessment - M2 Junction 4 Cost Estimate Report	10 November 2025	No	No	
B. EVIDENCE BASE	B18.10	B18.10 Strategic Transport Assessment - Forecasting Methodology Report	12 January 2024		Yes	
B. EVIDENCE BASE	B18.11	B18.11 Strategic Transport Assessment - Local Model Validation Report	12 January 2024		Yes	
B. EVIDENCE BASE	B18.12	B18.12 Strategic Transport Assessment - Data Collection Report	December 2023		Yes	
B. EVIDENCE BASE	B19	B19 Health Impact Assessment Toolkit	June 2025		Yes	
B. EVIDENCE BASE	B20	B20 Local Aggregates Assessment	December 2025		No	Published annually
B. EVIDENCE BASE	B21.1	B21.1 Waste Needs Assessment - Report 1	18 June 2024		Yes	
B. EVIDENCE BASE	B21.2	B21.2 Waste Needs Assessment - Report 2	18 June 2024		Yes	
B. EVIDENCE BASE	B21.3	B21.3 Waste Needs Assessment - Report 3	18 June 2024		Yes	
B. EVIDENCE BASE	B21.4	B21.4 Waste Needs Assessment - Report 4	18 June 2024		Yes	
B. EVIDENCE BASE	B21.5	B21.5 Waste Needs Assessment - Report 5	July 2024		Yes	
B. EVIDENCE BASE	B21.6	B21.6 Waste Needs Assessment - Report 6	18 June 2024		Yes	
B. EVIDENCE BASE	B21.7	B21.7 Waste Needs Assessment - Report 7	18 June 2024		Yes	
B. EVIDENCE BASE	B22.1	B22.1 Site Selection Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.2	B22.2 Hoo Peninsula Strategic Environmental Programme Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.3	B22.3 Site-Specific Flood Risk Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.4	B22.4 Green Belt Exceptional Circumstances Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.5	B22.5 Housing Delivery Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.6	B22.6 Self-build and Custom Housebuilding Topic Paper	December 2025	No	No	Previous iteration of Self-build and Custom Housebuilding Topic Paper was available at Regulation 19.
B. EVIDENCE BASE	B22.7	B22.7 Gypsy and Traveller Accommodation Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.8	B22.8 Main Town Centre Uses Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.9	B22.9 Vehicle Trip Budget Topic Paper	December 2025	No	No	
B. EVIDENCE BASE	B22.10	B22.10 Health and Wellbeing Topic Paper	December 2025	No	No	Previous iteration of Health and Wellbeing Topic Paper was available at Regulation 19.
B. EVIDENCE BASE	B22.11	B22.11 Minerals and Waste Topic Paper	April 2025		Yes	
C. PREVIOUS STAGES	C1.1	C1.1 Regulation 19 (2025) Pre-Submission Draft Medway Local Plan 2041			n/a	
C. PREVIOUS STAGES	C1.2	C1.2 Regulation 19 (2025) Representations			n/a	
C. PREVIOUS STAGES	C2.1	C2.1 Regulation 18 (2024) Consultation Document			n/a	
C. PREVIOUS STAGES	C2.2	C2.2 Regulation 18 (2024) Consultation Summary Report			n/a	
C. PREVIOUS STAGES	C2.3	C2.3 Regulation 18 (2024) Representations			n/a	
C. PREVIOUS STAGES	C2.4.1	C2.4.1 Regulation 18 (2024) Interim Sustainability Appraisal - Volume 1 of 2 - Main Report			n/a	
C. PREVIOUS STAGES	C2.4.2	C2.4.2 Regulation 18 (2024) Interim Sustainability Appraisal - Volume 2 of 2 - Appendices			n/a	
C. PREVIOUS STAGES	C2.5	C2.5 Regulation 18 (2024) Interim Habitats Regulations Assessment			n/a	
C. PREVIOUS STAGES	C2.6	C2.6 Regulation 18 (2024) Draft Viability Assessment			n/a	
C. PREVIOUS STAGES	C2.7	C2.7 Regulation 18 (2024) Draft Green and Blue Infrastructure Framework			n/a	
C. PREVIOUS STAGES	C2.8	C2.8 Regulation 18 (2024) Landscape Character Assessment			n/a	
C. PREVIOUS STAGES	C2.9	C2.9 Regulation 18 (2024) Surface Water Management Plan for Hoo and Rainham			n/a	
C. PREVIOUS STAGES	C2.10	C2.10 Regulation 18 (2024) Surface Water Management Plan for Lower and Middle Stoke			n/a	

EXAMINATION LIBRARY CATEGORY	REFERENCE	DOCUMENT TITLE	DATE OF DOCUMENT	AVAILABLE AT REGULATION 19 - MLP/ED4	AVAILABLE AT REGULATION 19 - MEDWAY COUNCIL	MEDWAY COUNCIL'S NOTES
C. PREVIOUS STAGES	C2.11	C2.11 Regulation 18 (2024) Gypsy and Traveller Accommodation Assessment			n/a	
C. PREVIOUS STAGES	C2.12	C2.12 Regulation 18 (2024) River Medway Economic Frontages Uses Study			n/a	
C. PREVIOUS STAGES	C2.13	C2.13 Regulation 18 (2024) Chatham Docks Economic Impact Assessment			n/a	
C. PREVIOUS STAGES	C2.14	C2.14 Regulation 18 (2024) Retail Topic Paper - Definition of Town Centre Boundaries and Primary Shopping Areas			n/a	
C. PREVIOUS STAGES	C2.15	C2.15 Regulation 18 (2024) Retail Topic Paper - Local, Rural, Neighbourhood Centres and Shopping Parades			n/a	
C. PREVIOUS STAGES	C2.16.1	C2.16.1 Regulation 18 (2024) Strategic Transport Assessment - Forecast Report			n/a	
C. PREVIOUS STAGES	C2.16.2	C2.16.2 Regulation 18 (2024) Strategic Transport Assessment - Forecasting Methodology Report			n/a	
C. PREVIOUS STAGES	C2.16.3	C2.16.3 Regulation 18 (2024) Strategic Transport Assessment - Local Model Validation Report			n/a	
C. PREVIOUS STAGES	C2.16.4	C2.16.4 Regulation 18 (2024) Strategic Transport Assessment - Data Collection Report			n/a	
C. PREVIOUS STAGES	C2.17	C2.17 Regulation 18 (2024) Draft Open Space Assessment			n/a	
C. PREVIOUS STAGES	C2.18.1	C2.18.1 Regulation 18 (2024) Playing Pitch Strategy - Needs Assessment			n/a	
C. PREVIOUS STAGES	C2.18.2	C2.18.2 Regulation 18 (2024) Playing Pitch Strategy - Strategy Document			n/a	
C. PREVIOUS STAGES	C2.19	C2.19 Regulation 18 (2024) Minerals and Waste Topic Paper			n/a	
C. PREVIOUS STAGES	C2.20.1	C2.20.1 Regulation 18 (2024) Waste Needs Assessment - Report 1			n/a	
C. PREVIOUS STAGES	C2.20.2	C2.20.2 Regulation 18 (2024) Waste Needs Assessment - Report 2			n/a	
C. PREVIOUS STAGES	C2.20.3	C2.20.3 Regulation 18 (2024) Waste Needs Assessment - Report 3			n/a	
C. PREVIOUS STAGES	C2.20.4	C2.20.4 Regulation 18 (2024) Waste Needs Assessment - Report 4			n/a	
C. PREVIOUS STAGES	C2.20.5	C2.20.5 Regulation 18 (2024) Waste Needs Assessment - Report 5			n/a	
C. PREVIOUS STAGES	C2.20.6	C2.20.6 Regulation 18 (2024) Waste Needs Assessment - Report 6			n/a	
C. PREVIOUS STAGES	C2.20.7	C2.20.7 Regulation 18 (2024) Waste Needs Assessment - Report 7			n/a	
C. PREVIOUS STAGES	C2.21	C2.21 Regulation 18 (2024) Local Aggregates Assessment 2022			n/a	
C. PREVIOUS STAGES	C3.1	C3.1 Regulation 18 (2023) Consultation Document			n/a	
C. PREVIOUS STAGES	C3.2	C3.2 Regulation 18 (2023) Consultation Summary Report			n/a	
C. PREVIOUS STAGES	C3.3	C3.3 Regulation 18 (2023) Representations			n/a	




Appendix F

Strategic site delivery

Strategic Sites



Legend

-  Medway boundary
-  Strategic Sites
-  Frindsbury Peninsula Opportunity Area



Site reference: SMI6

Site name: Chatham Docks

Map



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Map data ©2026 Google

Total capacity (dwellings): 3,000

Total completions (dwellings) in the plan period: 2,200

Total completions (dwellings) in five years following adoption: 375

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	100	275	375	275	75	350	75	350	1,125	75	350	0	275	0	700

Land control

One land owner (Peel L&P Limited)

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

MC/11/2756, MC/17/1918, MC/18/0997, MC/21/2610 for adjacent site are under construction. Illustrative masterplan submitted by Peel Waters. The applicants for sites SMI6, GN15 and GN6 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.

Specific infrastructure required

Chatham Waters Line conversion, i.e. a new active travel corridor linking the riverside around Chatham Maritime and Gillingham Riverside with Gillingham town centre.

Waterfront development proposals will incorporate public space to facilitate walking and cycling, i.e. Policy T20 – Riverside Path.

Based on an average cost of £1,526/m to raise an existing defence wall, it is estimated to cost in the region of £2,400,000 to upgrade approximately 1,550m of defences in order to protect the site for the lifetime of any development.

Developer contributions for bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, public realm, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

Infrastructure funding route

Ongoing discussion with Homes England, e.g. National Housing Bank. Section 106.

Site reference: GN15

Site name: Gillingham Waterfront

Map



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Satellite image



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Total capacity (dwellings): 1,100

Total completions (dwellings) in the plan period: 1,010

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

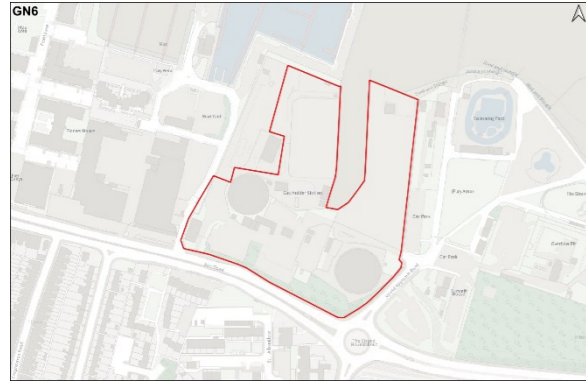
2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	101	101	101	101	101	505	101	101	101	101	101	505

<p>Land control One land owner (Gillingham Marina Management Ltd)</p> <p>Anticipated application dates TBC during the drafting of SoCGs with planning agents.</p> <p>Master planning status Illustrative masterplan submitted by Peel Waters. The applicants for sites SMI6, GN15 and GN6 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.</p>	<p>Specific infrastructure required Waterfront development proposals will incorporate public space to facilitate walking and cycling, i.e. Policy T20 – Riverside Path. Based on an average cost of £1,526/m to raise an existing defence wall, it is estimated to cost in the region of £1,550,000 to upgrade the 1,000m of defences in order to protect the site for the lifetime of any development. Developer contributions for bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care and secondary care. Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.</p> <p>Infrastructure funding route Ongoing discussion with Homes England, e.g. National Housing Bank. Section 106.</p>
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Site reference: GN6

Site name: Former gas works site, north of Pier Road, Gillingham

Map



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Total capacity (dwellings): 500

Total completions (dwellings) in the plan period: 500

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	83	83	83	83	83	415	83	2	0	0	0	85

Land control

One land owner (Blueberry Developments Estates)

Anticipated application dates

MC/25/1033 on 11 March 2026 subject to a Section 106.

Master planning status

Illustrative masterplan submitted by Peel Waters. The applicants for sites SMI6, GN15 and GN6 will collaborate to produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details.

Specific infrastructure required

Refurbishing the Strand Lido and a new bus shelter in Pier Road.

Developer contributions subject to a Section 106.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

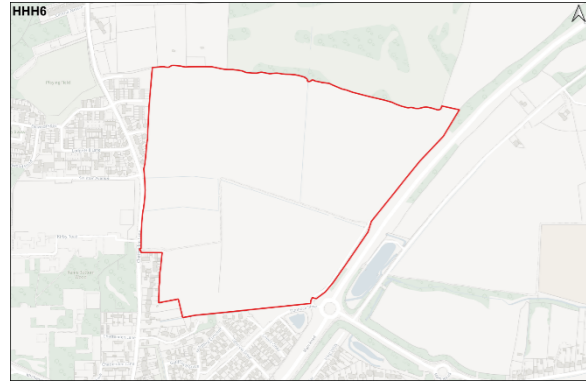
Infrastructure funding route

Ongoing discussion with Homes England, e.g. National Housing Bank.
Section 106.

Site reference: HHH6

Site name: Land north-west of Ratcliffe Highway, Chattenden

Map



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Total capacity (dwellings): 550

Total completions (dwellings) in the plan period: 550

Total completions (dwellings) in five years following adoption: 83

Anticipated start and completion dates

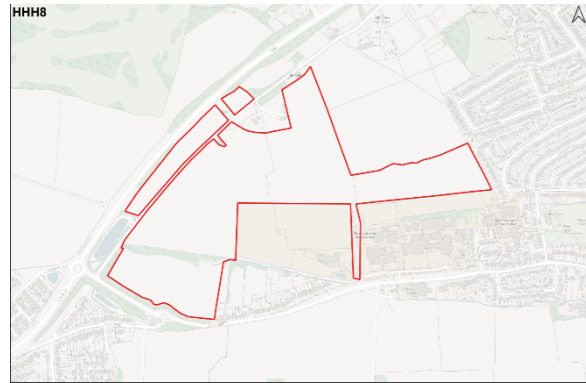
2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	83	83	83	83	83	83	83	415	52	0	0	0	0	52

<p>Land control One land owner (W St J Brice Limited)</p> <p>Anticipated application dates TBC during the drafting of SoCGs with planning agents.</p> <p>Master planning status Hoo Development Framework was published for consultation in 2022. Policy SA8 in the submission Medway Local Plan 2041 requires Medway Council, the Hoo Consortium and wider developers to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.</p>	<p>Specific infrastructure required Relocation of Chattenden Primary School, with expansion to two-form entry. Retail / community service. Developer contributions for off-site highway mitigations, Strategic Environmental Management Scheme, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education. Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion.</p> <p>Infrastructure funding route Section 106</p>
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Site reference: HHH8

Site name: Land west of Hoo St Werburgh

Map



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Total capacity (dwellings): 450

Total completions (dwellings) in the plan period: 450

Total completions (dwellings) in five years following adoption: 280

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	70	70	70	70	280	70	70	30	0	0	170	0	0	0	0	0	0

Land control

National housebuilder (Taylor Wimpey) is sole owner.

Anticipated application dates

MC/24/2022 validated on 3 October 2024. Non-determination appeal underway. Principle of development supported; however, the proposal does not provide an effective landscape buffer and it would lead to coalescence of settlements.

Master planning status

Hoo Development Framework was published for consultation in 2022. Policy SA8 in the submission Medway Local Plan 2041 requires Medway Council, the Hoo Consortium and wider developers to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.

Specific infrastructure required

Community use building.

Playing pitches.

Developer contributions for off-site highway mitigations, Strategic Environmental Management Scheme, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion.

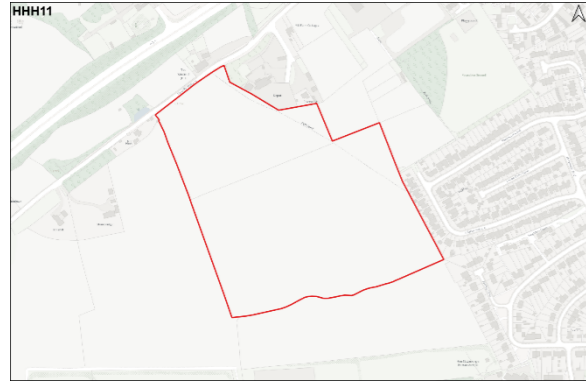
Infrastructure funding route

Section 106

Site reference: HHH11

Site name: Land adjacent to Vidgeon Avenue, Hoo St Werburgh

Map



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Total capacity (dwellings): 240

Total completions (dwellings) in the plan period: 240

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	60	60	60	60	0	240	0	0	0	0	0	0

Land control

TBC

Anticipated application dates

MC/23/1934 validated on 4 September 2023. Non-determination appeal underway.

Master planning status

Hoo Development Framework was published for consultation in 2022. Policy SA8 in the submission Medway Local Plan 2041 requires Medway Council, the Hoo Consortium and wider developers to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.

Specific infrastructure required

Developer contributions for off-site highway mitigations, Strategic Environmental Management Scheme, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

Infrastructure funding route

Section 106

Site reference: HHH12

Site name: Land south of Main Road, Hoo St Werburgh

Map



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Total capacity (dwellings): 1,800

Total completions (dwellings) in the plan period: 1,800

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	188	188	188	188	188	940	188	188	188	188	108	860

Land control

W St J Brice Limited

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

Hoo Development Framework was published for consultation in 2022. Policy SA8 in the submission Medway Local Plan 2041 requires Medway Council, the Hoo Consortium and wider developers to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.

Specific infrastructure required

Convenience retail commensurate with the scale of development. Community facility. Cockham Community Parkland.

Based on an average cost of £1,152/m to raise an existing embankment, it is estimated to cost in the region of £3,150,000 to upgrade the 2,700m of defences in order to protect the site for the lifetime of any development. Developer contributions for off-site highway mitigations, Strategic Environmental Management Scheme, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: The land proposed for development contains a sealed pressurised sewer rising main pipe. As these assets are deemed critical sewers, it is not permissible for a developer to divert or build over/near them. Relocating these assets is not always viable, but developer could make a sewer diversion application to Southern Water to request this service. Initial checks also indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

Infrastructure funding route

Section 106

Site reference: HHH22 & HHH31

Site name: Land either side of Roper's Lane, Hoo St Werburgh

Map



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Total capacity (dwellings): 3,200

Total completions (dwellings) in the plan period: 1,880

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	188	188	188	188	188	940	188	188	188	188	188	940

Land control

One land owner (Church Commissioners for England)

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

Hoo Development Framework was published for consultation in 2022. Policy SA8 in the submission Medway Local Plan 2041 requires Medway Council, the Hoo Consortium and wider developers to produce a Hoo Planning Framework, including a masterplan, to guide planning applications and further approval of details.

Specific infrastructure required

Primary school, secondary school, health facility, community facility, leisure centre / playing pitches / sports facility and convenience retail commensurate with the scale of development.

Based on an average cost of £1,152/m to raise an existing embankment, it is estimated to cost in the region of £4,400,000 to upgrade approximately 3,800m of defences in order to protect the site for the lifetime of any development.

Developer contributions for off-site highway mitigations, Strategic Environmental Management Scheme, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site is over 500m from the wastewater network and has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion.

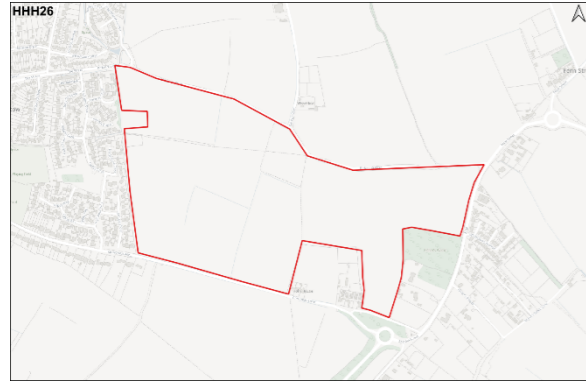
Infrastructure funding route

Section 106

Site reference: HHH26

Site name: North of Christmas Lane, High Halstow

Map



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Total capacity (dwellings): 760

Total completions (dwellings) in the plan period: 760

Total completions (dwellings) in five years following adoption: 350

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	30	80	80	80	80	350	80	80	80	80	80	400	10	0	0	0	0	10

Land control

Redrow

Anticipated application dates

MC/23/0855 approved on 11 March 2026 subject to a Section 106.

Master planning status

n/a

Specific infrastructure required

Local centre (up to 1,000 sqm Use Classes E and F) and upgrade to existing Public Right of Way.

Developer contributions subject to a Section 106.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

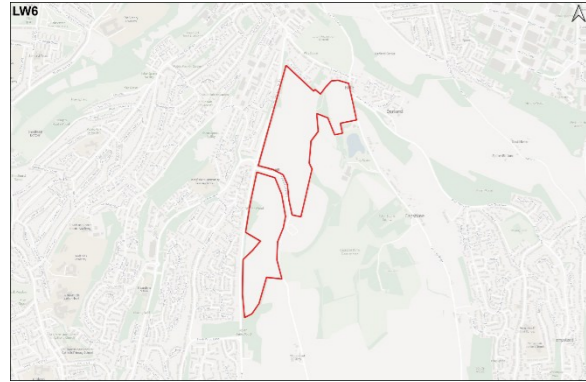
Infrastructure funding route

Section 106

Site reference: LW6

Site name: East Hill

Map



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Total capacity (dwellings): 800

Total completions (dwellings) in the plan period: 800

Total completions (dwellings) in five years following adoption: 794

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
6	86	233	231	214	30	794	0	0	0	0	0	0	0	0	0	0	0	0

Land control

Taylor Wimpey UK Limited and F D Attwood and Partners

Anticipated application dates

MC/19/0765 is under construction.

Master planning status

n/a

Specific infrastructure required

Primary school, supporting retail space of up to 150sqm and a GP surgery.

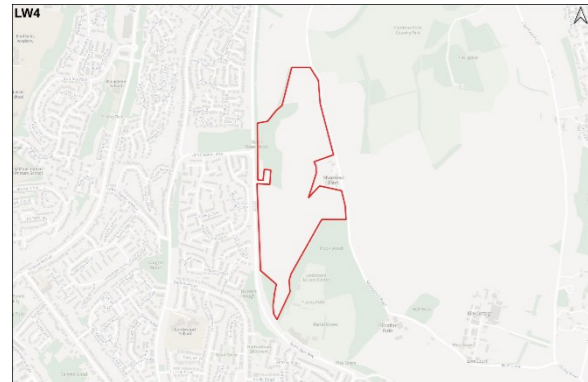
Infrastructure funding route

n/a

Site reference: LW4

Site name: Sharstead Farm

Map



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Total capacity (dwellings): 670

Total completions (dwellings) in the plan period: 670

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	68	68	68	68	68	340	68	68	68	68	58	330

Land control

One land owner (F D Attwood and Partners)

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

Collaboration work ongoing with planning agent to agree an overarching land use budget. The applicant will produce a landscape-led masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space strategy.

Specific infrastructure required

Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

A new six to eight-form entry secondary school, which will be part-funded by the Lidsing Garden Community (Maidstone Borough), is required early in the plan period. Abbots 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.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion.

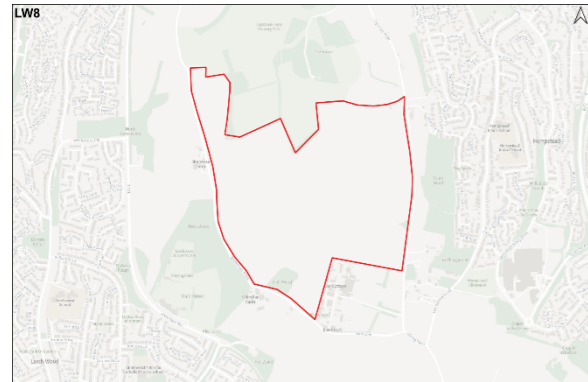
Infrastructure funding route

Section 106

Site reference: LW8

Site name: Mill Fields

Map



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Total capacity (dwellings): 2,330

Total completions (dwellings) in the plan period: 2,000

Total completions (dwellings) in five years following adoption: 475

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	50	125	150	150	475	150	150	150	150	150	750	150	150	150	150	175	775

Land control

One land owner (F D Attwood and Partners)

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

Collaboration work ongoing with planning agent to agree an overarching land use budget. The applicant will produce a landscape-led masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details. The masterplan will be informed by a green infrastructure strategy and an open space strategy.

Specific infrastructure required

Three-form entry primary school and a local centre commensurate with the scale of development. Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

A new six to eight-form entry secondary school, which will be part-funded by the Lidsing Garden Community (Maidstone Borough), is required early in the plan period. Abbots 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.

Southern Water: Initial checks indicate this site is up to 840m from the nearest connection point and has limited wastewater network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

Infrastructure funding route

Section 106

Site reference: LW7

Site name: Gibraltar Farm

Map



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Satellite image



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Total capacity (dwellings): 450

Total completions (dwellings) in the plan period: 450

Total completions (dwellings) in five years following adoption: 400

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	100	100	100	100	400	50	0	0	0	0	50	0	0	0	0	0	0

Land control

One land owner (F D Attwood and Partners)

Anticipated application dates

MC/18/0556 approved on 26 September 2018.

Master planning status

n/a

Specific infrastructure required

Provide for east-west connections, including orbital bus route, between North Dane Way and M2 Junction 4.
Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.

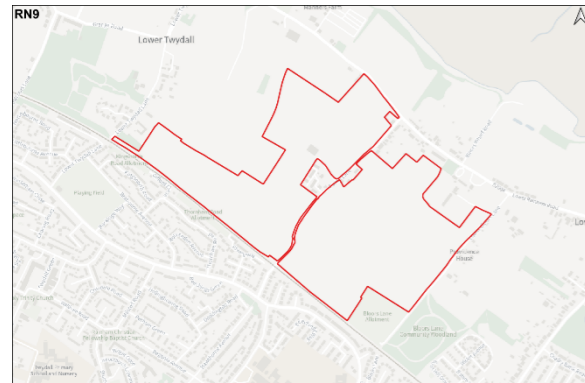
Infrastructure funding route

Section 106

Site reference: RN9

Site name: Pump Farm and Bloors Farm, Lower Rainham, Gillingham

Map



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Satellite image



Map data ©2026 Google

Total capacity (dwellings): 750

Total completions (dwellings) in the plan period: 750

Total completions (dwellings) in five years following adoption: 280

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	40	80	160	280	240	230	0	0	0	470	0	0	0	0	0	0

Land control

A.C. Goatham and Son Limited

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

The applicant (Esquire Homes coordinating a consortium of SME housebuilders) will produce a masterplan, to be approved by Medway Council, to guide subsequent planning applications and further approval of details. The masterplan will be informed by a Rural Design Code, a green infrastructure strategy and an open space strategy. This will be informed by an independent and impartial South East Design Review Panel.

Specific infrastructure required

A local centre commensurate with a new community of up to 750 new homes including a children’s nursery, two-form entry primary school, community hub, health hub, a care home and convenience retail commensurate with the scale of development.

Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, youth facilities, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure also crosses parts of the site and may require easements or diversion.

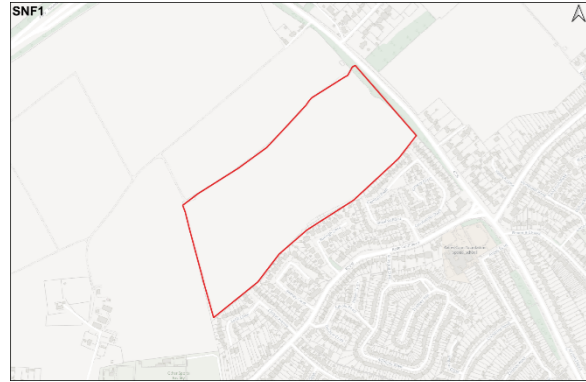
Infrastructure funding route

Section 106

Site reference: SNF1

Site name: Land west of A226 Gravesend Road and north of Brompton Farm Road, Strood, Rochester

Map



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Satellite image



Map data ©2026 Google

Total capacity (dwellings): 360

Total completions (dwellings) in the plan period: 360

Total completions (dwellings) in five years following adoption: 160

Anticipated start and completion dates

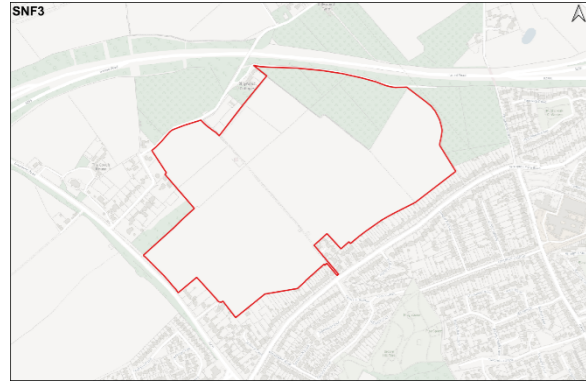
2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	40	40	40	40	160	40	40	40	40	40	200	0	0	0	0	0	0

<p>Land control One land owner (David Wilson Homes)</p> <p>Anticipated application dates TBC during the drafting of SoCGs with planning agents.</p> <p>Master planning status SNF1, SNF3 and SR5 are part of a cross-border, strategic location for growth. However, planning applications for each site could be submitted independently. Medway Council and Gravesham Borough Council are collaborating with developers' planning agents to prepare a masterplan. This will be informed by an independent and impartial South East Design Review Panel.</p>	<p>Specific infrastructure required Precise locations are subject to an agreed masterplan, however, this strategic location for growth will need to provide a two-form entry primary school, an eight-form entry secondary school and a primary and community health facility, along with a local centre commensurate with the scale of development. Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care, secondary care and education. Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated.</p> <p>Infrastructure funding route Section 106</p>
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Site reference: SNF3

Site name: Land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road, Strood, Rochester

Map



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Satellite image



Map data ©2026 Google

Total capacity (dwellings): 800

Total completions (dwellings) in the plan period: 800

Total completions (dwellings) in five years following adoption: 170

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	20	75	75	170	75	75	75	75	75	375	75	75	75	30	0	255

<p>Land control One land owner (Bellway Homes)</p> <hr/> <p>Anticipated application dates TBC during the drafting of SoCGs with planning agents.</p> <hr/> <p>Master planning status SNF1, SNF3 and SR5 are part of a cross-border, strategic location for growth. However, planning applications for each site could be submitted independently. Medway Council and Gravesend Borough Council are collaborating with developers' planning agents to prepare a masterplan. This will be informed by an independent and impartial South East Design Review Panel.</p>	<p>Specific infrastructure required Precise locations are subject to an agreed masterplan, however, this strategic location for growth will need to provide a two-form entry primary school, an eight-form entry secondary school and a primary and community health facility, along with a local centre commensurate with the scale of development. Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care, secondary care and education. Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion.</p> <hr/> <p>Infrastructure funding route Section 106</p>
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Site reference: SR5

Site name: 178 and land north of Brompton Farm Road (west of Stonehorse Lane) Strood, Rochester

Map



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Total capacity (dwellings): 120

Total completions (dwellings) in the plan period: 120

Total completions (dwellings) in five years following adoption: 120

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	60	60	0	0	120	0	0	0	0	0	0	0	0	0	0	0	0

Land control

One land owner (Brookworth Homes Limited)

Anticipated application dates

TBC during the drafting of SoCGs with planning agents.

Master planning status

SNF1, SNF3 and SR5 are part of a cross-border, strategic location for growth. However, planning applications for each site could be submitted independently. Medway Council and Gravesham Borough Council are collaborating with developers' planning agents to prepare a masterplan. This will be informed by an independent and impartial South East Design Review Panel.

Specific infrastructure required

Precise locations are subject to an agreed masterplan, however, this strategic location for growth will need to provide a two-form entry primary school, an eight-form entry secondary school and a primary and community health facility, along with a local centre commensurate with the scale of development.

Developer contributions for off-site highway mitigations, bird disturbance mitigation, cultural services, library expansion, open space, indoor sport, waste, social care, primary care, community care, secondary care and education.

Southern Water: Initial checks indicate this site has limited network capacity and phasing of development may be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated. Southern Water infrastructure crosses parts of the site and may require easements or diversion

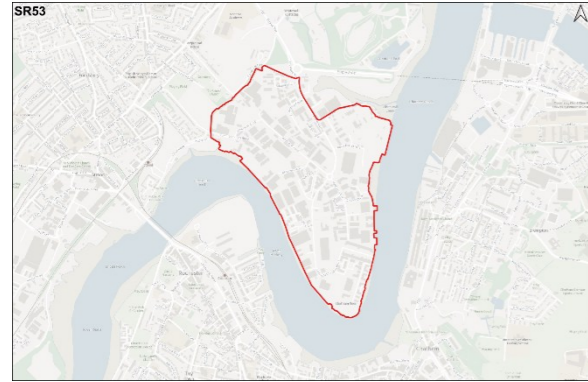
Infrastructure funding route

Section 106

Site reference: SR53

Site name: Frindsbury Peninsula

Map



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Total capacity (dwellings): 2,493

Total completions (dwellings) in the plan period: 690

Total completions (dwellings) in five years following adoption: 0

Anticipated start and completion dates

2025/26 Year 0	2026/27 Year 1	2027/28 Year 2	2028/29 Year 3	2029/30 Year 4	2030/31 Year 5	Years 1-5	2031/32 Year 6	2032/33 Year 7	2033/34 Year 8	2034/35 Year 9	2035/36 Year 10	Years 6-10	2036/37 Year 11	2037/38 Year 12	2038/39 Year 13	2039/40 Year 14	2040/41 Year 15	Years 11-15
0	0	0	0	0	0	0	0	0	0	0	0	0	138	138	138	138	138	690

Land control

Fragmented land ownership. Enterprise Zone in the 1980s and 1990s.

Anticipated application dates

n/k

Master planning status

Medway Council will produce a Frindsbury Peninsula Planning Framework by 2030/31 to manage the medium to long-term redevelopment, including a riverside strategy, an economic strategy and the delivery of strategic flood risk infrastructure.

Specific infrastructure required

Retention of wharfage.
Based on an average cost of £1,526/m to raise an existing defence wall, it is estimated to cost in the region of £5,850,000 to upgrade approximately 3,800m of defences in order to protect the site for the lifetime of any development.
Flood defences to be identified in collaboration with the Environment Agency, along with creation of inter-tidal habitat.
A recreational central park and a buffer for flooding and rainwater.

Infrastructure funding route

n/k