

Statement of Common Ground with Prescribed Bodies

Medway Council

September 2026

Versions

Version	Name	Date
1	Initial Proposed Composite Statement of Common Ground with Strategic Bodies	12 June 2025
2	First Draft Statement of Common Ground with Prescribed Bodies	10 December 2025
3	Second Draft Statement of Common Ground with Prescribed Bodies (following correspondence with the Marine Management Organisation)	15 December 2025
4	Third Draft Statement of Common Ground with Prescribed Bodies (following correspondence with Tonbridge and Malling Borough Council)	16 December 2025
5	Fourth Draft Statement of Common Ground with Prescribed Bodies (following correspondence with Swale Borough Council)	16 December 2025
6	Fifth Draft Statement of Common Ground with Prescribed Bodies (following additional correspondence with Tonbridge and Malling Borough Council)	16 December 2025
7	Submission Statement of Common Ground with Prescribed Bodies (following additional correspondence with Tonbridge and Malling Borough Council)	17 December 2025
8	Examination Statement of Common Ground with Prescribed Bodies (following correspondence with the Environment Agency, Natural England, NHS Kent and Medway Integrated Care Board and NHS Property Services)	23 January 2026
9	Examination Statement of Common Ground with Prescribed Bodies (following correspondence with the Environment Agency, Natural England, Kent County Council, Gravesham Borough Council, Swale Borough Council and Tonbridge and Malling Borough Council)	14 September 2026

Status of the Statement of Common Ground

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

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

Sport England and the Marine Management Organisation signed version 7 of this SoCG before the Medway Local Plan 2041 was submitted for examination. The other prescribed bodies were taking the SoCG through their respective governance processes.

This SoCG (version 9) has been updated following correspondence with the other prescribed bodies.

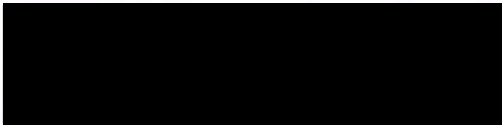
Maidstone Borough Council and National Highways requested separate SoCGs. These SoCGs have been published as document references A12.3 and MLP/ED20 respectively.

The SoCG with Southern Water was published on 12 August 2026 (ref: MLP/ED21).

The SoCG with Kent County Council concerning Waste Management and Minerals Supply (ref: A12.4) is the final version.

The proposed SoCG with Thurrock Council dated 2 June 2025 (ref: A12.5) concerning strategic waste management was reissued with minor updates to Thurrock Council on 21 August 2026. Thurrock Council opened its Regulation 19 consultation on 2 September 2026. Medway Council has requested an update from Thurrock Council.

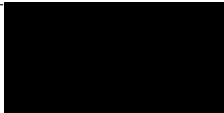
On behalf of Medway Council

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Position	Chief Planning Officer
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On behalf of Gravesham Borough Council

Name	Shazad Ghani
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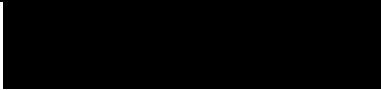
On behalf of Tonbridge and Malling Borough Council

Name	Eleanor Hoyle
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Signature	

On behalf of Swale Borough Council

Name	Stuart Watson
Position	Project Manager Planning Policy
Strategic matters	Local housing need; Gypsy, Traveller and Travelling Showpeople; Air quality (human health)
Signature	

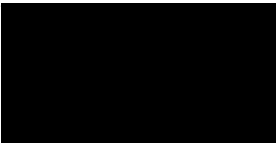
On behalf of Kent County Council

Name	Sharon Thompson
Position	Head of Planning Applications
Strategic matters	Strategic sites; Schools; Historic environment; M2 Junction 1; M2 Junction 4; A229 Blue Bell Hill; Air quality (human health); Minerals supply; Waste management
Signature	 14th September 2026

On behalf of the Environment Agency

Name	Connor Bowman
Position	Sustainable Places Team Leader
Strategic matters	Flood risk
Signature	

On behalf of Natural England

Name	Niall Walkden
Position	Sustainable Development, Principal Manager
Strategic matters	Natural environment
Signature	

On behalf of Historic England

Name	Alan Byrne
Position	Historic Environment Planning Adviser
Strategic matters	Historic environment (Version 7, 17 December 2026)
Signature	

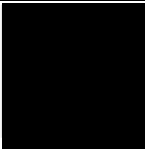
On behalf of Sport England

Name	Bob Sharples
Position	Principal Planning Manager - South Team Planning & Active Environments
Strategic matters	Community facilities (Version 7, 17 December 2026)
Signature	

On behalf of Marine Management Organisation

Name	Clare Kavanagh
Position	Marine Planning Manager
Strategic matters	Natural environment (Version 7, 17 December 2026)
Signature	

On behalf of NHS Kent and Medway Integrated Care Board

Name	Simon Brooks-Sykes
Position	Deputy Director of Strategic Estate and Sustainability
Strategic matters	NHS community facilities (Version 8, 16 January 2026)
Signature	

Contents

Status of the Statement of Common Ground.....	3
Contents	7
1 Introduction	8
1.1 Definition, purpose and structure	8
1.2 Terminology	8
1.3 Strategic context of the Medway unitary authority area	8
2 Strategic Matters	11
2.1 Local housing need.....	11
2.2 Gypsy, Traveller and Travelling Showpeople	12
2.3 Employment land	13
2.4 Strategic sites	13
2.5 Green Belt	14
2.6 Natural environment	15
2.7 Schools.....	23
2.8 Historic environment	24
2.9 Strategic Road Network – M2 Junction 1	24
2.10 Strategic Road Network – M2 Junction 4	28
2.11 Major Road Network – A229 Blue Bell Hill	29
2.12 Air quality (human health)	30
2.13 Flood risk	30
2.14 Community facilities	32
2.15 Minerals supply	33
2.16 Waste management.....	33
3 Governance Arrangements	34
3.1 Effective cooperation	34
3.2 Main points of contact.....	34
4 Timetable and Ongoing Cooperation	35
4.1 Timetable.....	35
4.2 Ongoing Cooperation.....	37

1 Introduction

1.1 Definition, purpose and structure

- 1.1.1 A statement of common ground (SoCG) is a written record of agreements that have, or have not, been reached on key strategic matters, including the process for reaching agreements.
- 1.1.2 The first version of this document (June 2025) presented an initial proposed composite SoCG with prescribed bodies. Subsequently, Maidstone Borough Council and National Highways requested separate SoCGs. This latest version has been prepared in response to MLP/ED13; it is intended to support the Phase 1 Examination hearings.
- 1.1.3 This SoCG sets out the strategic context, strategic matters, governance arrangements and ongoing cooperation between Medway Council ('the Council' hereafter) and other prescribed bodies, as defined in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 Terminology

- 1.2.1 The initial proposed composite SoCG with prescribed bodies presented all matters as "Under discussion". Strategic matters have been discussed to resolve or refine the extent of disagreement.
- 1.2.2 This iteration of the SoCG presents matters as "Agreed" or "Under discussion". A SoCG can include "Not agreed" matters, but there are none which apply to this document.

1.3 Strategic context of the Medway unitary authority area

- 1.3.1 The Medway unitary authority area sits at the mouth of the River Medway on the north Kent estuarine coast, bordered by the Thames to the north and the Kent Downs to the south. The five historic towns linked by the A2 and the railway form a complex urban conurbation, which retains the distinct identities of the individual towns. The urban area is surrounded by a network of villages on the Hoo Peninsula and the Medway Valley, alongside marshes and mudflats, wooded hills, productive farmland and strategic energy and minerals operations built up around the wharves. Much of the countryside and estuary is of international importance for its environmental qualities, including designated Special Protection Areas, Sites of Special Scientific Interest and the Kent Downs National Landscape. Land to the west of Medway forms part of the London metropolitan Green Belt.
- 1.3.2 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by limited crossing points. The severance caused by the river, established commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in

dense employment areas and the existing local public transport offer beyond the main rail corridor make for a challenging environment in which to accommodate Medway's development needs. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth.

- 1.3.3 The Council is the local planning, transport, minerals and waste authority for the unitary authority area.
- 1.3.4 Medway's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum, as calculated in June 2025, or 26,176 over the new plan period, i.e. 2025/26 to 2040/41.
- 1.3.5 The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA).¹ A subsequent letter from the consultant, dated 11 June 2025, took account of updated policy, and identified the need for Gypsy and Traveller accommodation in Medway as:
 - 41 pitches for households that met the planning definition.
 - up to 15 pitches for undetermined households.
- 1.3.6 The GTAA identified the plot needs for travelling showpeople as:
 - four plots for households that met the planning definition.
 - up to four plots for undetermined households.
- 1.3.7 The 2025 Employment Land Needs Assessment (ELNA) identified the following minimum need for employment floorspace:
204,000 sqm of industrial floorspace.
36,500 sqm of office floorspace.
- 1.3.8 Figure 1 shows the location of Medway in relation to neighbouring local planning authorities:

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

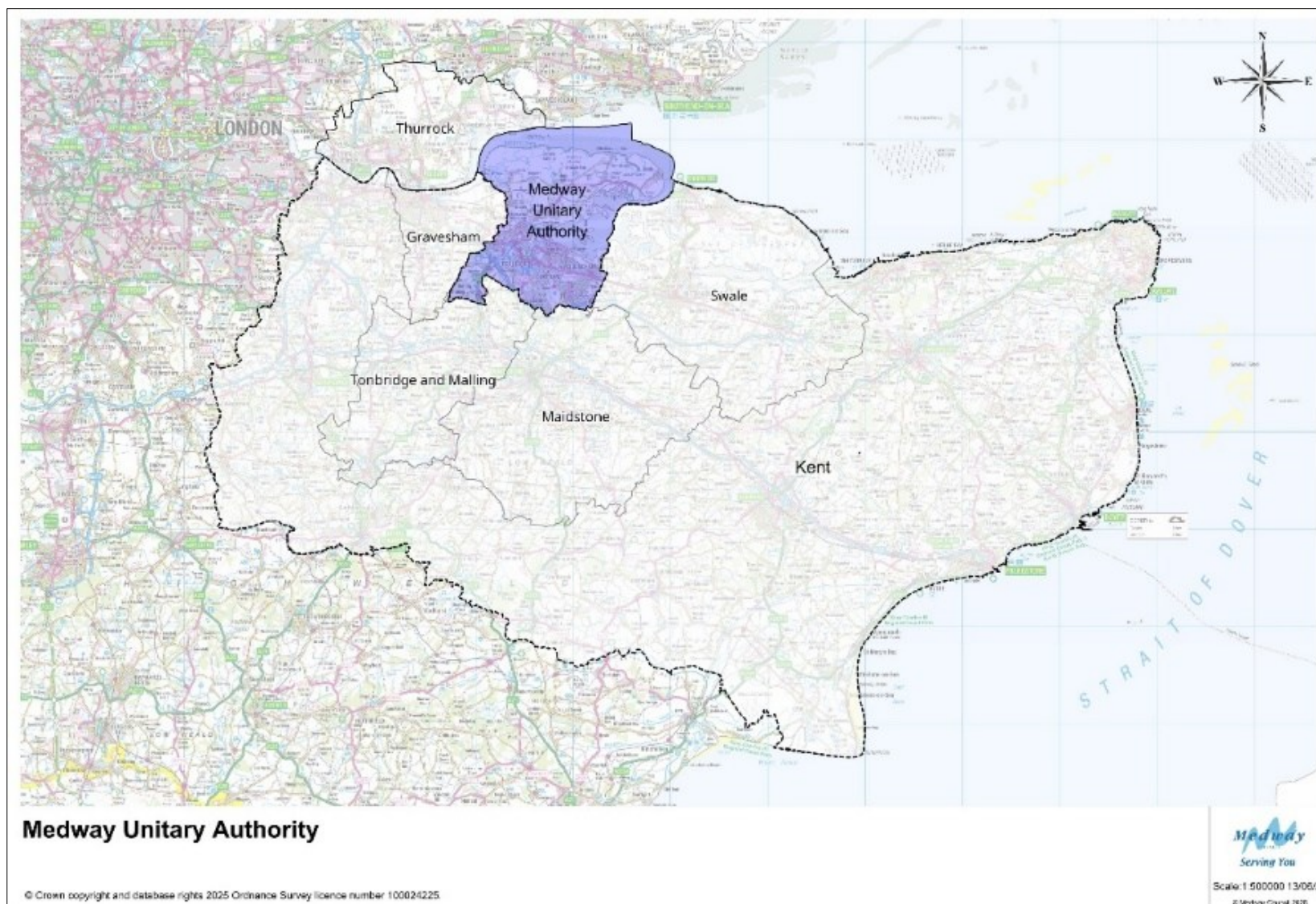


Figure 1: Location of Medway

2 Strategic Matters

2.1 Local housing need

- 2.1.1 The National Planning Policy Framework expects strategic policy-making bodies to apply the Standard Method when assessing local housing need. This method calculates a minimum annual need by starting from the local housing stock baseline and then increasing it to account for local affordability pressures. The figure produced by the Standard Method represents an unconstrained estimate of homes needed to inform plan-making; it is a minimum housing need indicator, not a fixed housing requirement.
- 2.1.2 Medway's local housing need, derived from the Standard Method, is 1,636 per annum, as calculated in June 2025.
- 2.1.3 During Duty to Cooperate (DtC) meetings, planning officers from the Council and Swale Borough Council have consistently stated the intention to meet local housing need, subject to the evidence base emerging at the time.
- 2.1.4 As a key part of the evidence base, the Local Housing Needs Assessment (LHNA) disaggregated Medway's local housing need into the different types of housing the future population will need. The LHNA set out the affordable housing need. The affordable housing need figure is an unconstrained figure set in the current housing market situation. It is not a component of the overall housing need, but is entirely independent, calculated using a different approach and different data sources. The LHNA also set out the needs of specific groups of people, such as older people. The LHNA was published in June 2025, along with other evidence base work.
- 2.1.5 The housing requirement is the minimum number of homes a local plan aims to deliver during the plan period. After calculating local housing need, local planning authorities should then estimate how many new homes can be provided in their area, supported by evidence on land availability, development constraints and any other relevant factors. The Council's housing requirement is supply-led. In other words, the extent to which Medway can meet its need and potentially contribute towards unmet need arising elsewhere is guided by the Land Availability Assessment, the Sustainability Appraisal and the site selection process. Medway's housing requirement reflects local housing need, derived from the Standard Method, which is 1,636 per annum.
- 2.1.6 Gravesham Borough Council previously maintained a longstanding request for the Council to accommodate an estimated unmet housing need of 2,000 homes through responses to consultations and during DtC meetings. Prior to Gravesham Borough Council's 'Proposed Submission Draft (Regulation 19)' Consultation, which started in April 2026, the Council did not receive an assessment of land availability from Gravesham Borough Council, therefore reasonable alternative growth options in the Sustainability Appraisal that included Gravesham's

calculation of unmet housing need could not be justified. Furthermore, the Council's Sustainability Appraisal found that reasonable alternative growth options without Gravesham's calculation of unmet housing need performed better overall. This matter is **agreed**. In response to the Council's Regulation 19 consultation, Gravesham Borough Council did not raise any objections under soundness or legal compliance.

- 2.1.7 On 14 October 2025, Tonbridge and Malling Borough Council wrote to the Council and other neighbouring local planning authorities in relation to the preparation of its Regulation 18 stage 2 Local Plan 2024-2042, requesting assistance with unmet need. Prior to this, Tonbridge and Malling Borough Council had not been able to confirm if it had any unmet needs and the scale of these.
- 2.1.8 Tonbridge and Malling Borough Council outlined its work in identifying development needs and how these could be met in the new Tonbridge and Malling Local Plan. Draft Local Plan site allocations include the release of land in the Green Belt. In pursuing a spatial option which includes the release of Green Belt, Tonbridge and Malling Borough Council is preparing an exceptional circumstances case to justify the release of designated sites. This work is being informed by discussions with neighbouring authorities to explore if they could accommodate some of the identified need for development in Tonbridge and Malling.
- 2.1.9 The Council responded on 10 December 2025 and confirmed that it is unable to assist in meeting unmet housing needs. The reasons given for this included being at an advanced stage of plan preparation, Medway's already high level of development needs, including 1,636 homes per year, environmental and other constraints that would make accommodating further growth challenging.
- 2.1.10 Tonbridge and Malling Borough Council recognise the difficulties in Medway meeting any unmet housing need, given the timing of the request and constraints identified. Tonbridge and Malling Borough Council held its 'Regulation 18 Local Plan Consultation (Stage 2)' from 10 November 2025 to 2 January 2026, which included another 'call for sites'. Following a Direction from the Secretary of State, the 'Regulation 19 Local Plan Consultation' commences 11 September 2026. This matter is therefore **agreed**; however, discussions will be ongoing regarding this matter as part of any future Local Plan review.
- 2.1.11 No other requests to accommodate unmet housing need have been received through responses to consultations or during DtC meetings with other local planning authorities. This matter is **agreed**.

2.2 Gypsy, Traveller and Travelling Showpeople

- 2.2.1 There have been recent planning applications for Gypsy and Traveller accommodation in Medway. Policy T10 requires existing sites to be protected and intensified or expanded to meet identified needs. New sites will also be permitted, subject to criteria. The respective needs of Gypsy, Traveller and Travelling Showpeople are **agreed**. A letter from the Council, setting out actions to address the needs for Gypsy, Traveller and

Travelling Showpeople, has been published on the Examination website (ref: MLP/ED17).

2.3 Employment land

- 2.3.1 The 2025 ELNA identified the following minimum need for employment land:
- 204,000 sqm of industrial floorspace.
 - 36,500 sqm of office floorspace.
- 2.3.2 There is a large pipeline of consented employment land, but this is in remote locations at Kingsnorth and the Isle of Grain, which provide for specific needs, and there is a shortage of built stock. Additional sites for employment uses have been allocated to provide for the wider employment market needs and to support sustainable growth. The Council can meet its need for employment land.
- 2.3.3 Tonbridge and Malling Borough Council has identified Green Belt sites for release to meet its employment land needs in its Regulation 18 stage 2 Local Plan. In October 2025, Tonbridge and Malling Borough Council asked the Council if it could assist in meeting any unmet office floorspace E(g)i and industrial B2 and B8 needs. In responding the Council has indicated that it is unable to assist in meeting unmet employment needs due to a large pipeline of employment consents, a weak office market in Medway and the relatively late stage of plan-making at which these unmet needs became known.
- 2.3.4 Tonbridge and Malling Borough Council recognise the difficulties in Medway meeting any unmet employment need, given the timing of the request and constraints identified. This matter is therefore **agreed**; however discussions will be on going regarding this matter as part of any future Local Plan review, although it is noted that in the emerging TMBC Local Plan it is proposed to meet the need for employment land.

2.4 Strategic sites

- 2.4.1 The Council and Gravesham Borough Council have cooperated on land to the west of Strood. By 2041, land to the west of Strood, together with Chapter Farm in the Gravesham borough, will comprise a cross-border sustainable location for up to 3,190 homes and employment land. It will also comprise two primary schools, expansion of an existing school in Medway, a secondary school, employment land and a local centre. It will provide a transition between the urban edge of Strood and maintain the identity of the rural settlement of Three Crutches.
- 2.4.2 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, respecting the setting of the Kent Downs National Landscape, to be approved by the Council and Gravesham Borough Council. This matter is **agreed**.
- 2.4.3 Tonbridge and Malling Borough Council consulted on its emerging Local Plan (Regulation 18 stage 2) during November 2025 to January 2026 and

following a Direction from the Secretary of State the 'Regulation 19 consultation' commences on 11 September 2026. The emerging plan proposes to allocate 'Land north of Holborough Lakes, Snodland' for 1,300 homes. This is part of a cross-border Holborough Quarry site that has also been promoted for allocation in the Council's new Local Plan. The promoter hosted site visits of representatives from both local planning authorities in 2024 and 2025. The site was rejected for allocation in the Council's site selection process. In response to the Council's Regulation 19 consultation, Tonbridge and Malling Borough Council set out its support for the Council's spatial strategy, noting the potential coalescence between settlements. This matter is **agreed**.

- 2.4.4 The Innovation Park Medway site straddles the administrative areas of Medway and Tonbridge and Malling. The site is part of the north Kent Enterprise Zone. The Council and Tonbridge & Malling Borough Council separately adopted a Local Development Order (LDO), masterplan and a design code for the site in 2020/21. Not all of the site has so far been built out. Following commercial market changes and options appraisal work, the Council intends to revoke the LDO and to pursue a mixed-use development comprising commercial uses (office and research), a care home and retirement units. Medway Local Plan 2041 Policy SA14: Employment Sites, therefore, identifies the site to deliver B2 - 11,248 sqm and E(g)iii - 21,000 sqm, between years 1-10 of the plan period.
- 2.4.5 Tonbridge & Malling Borough Council is supportive of the change in policy approach for Innovation Park Medway, to support the delivery of the remaining undeveloped land. Following discussions, Tonbridge & Malling Borough Council is taking forward the part of the site within their borough as a draft allocation in their emerging Local Plan; Policy A1: Housing and Employment Allocations identifies the site with reference E9 to deliver B2 - 14,000 sqm during their plan period. This matter is **agreed**, however discussions are ongoing as to the timing of LDO revocation.

2.5 Green Belt

- 2.5.1 Engagement with Gravesham Borough Council led to the reconsideration of three adjoining Green Belt sites in Medway to the west of Strood. Development on Gravesham land would compromise the ability of the remaining Medway Green Belt to perform its functions effectively. The prospect of a comprehensive site coming forward in this location would render this location more sustainable and better aligned to the Medway Local Plan 2041. This provides the basis for justifying exceptional circumstances for the release of Green Belt land in this location.
- 2.5.2 The Council has prepared a Green Belt Review and has identified most parcels of land to the west of Strood as Grey Belt land. Whilst these sites could come forward as individual proposals, there are more benefits from a comprehensive scheme. This provides the basis to justify exceptional circumstances and to deliver sustainable development with the supporting infrastructure.

- 2.5.3 Planning officers from the Council and Gravesham Borough Council have commissioned a landscape-led masterplan to inform strategic site allocation policies for respective local plans. Further work is required through engagement with developers and the finalisation of a landscape-led masterplan which will be the basis for determining planning applications.
- 2.5.4 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by the Council and Gravesham Borough Council. This matter is **agreed**.

2.6 Natural environment

- 2.6.1 Guidance from Natural England (NE), the Environment Agency and the Kent Downs National Landscape Unit has helped to shape strategic, development management and site allocation policies.
- 2.6.2 It is important to note that paragraphs 2.6.4 to 2.6.37 have been produced in collaboration with NE officers.
- 2.6.3 NE has provided specific guidance in relation to the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). The Council produced an interim HRA at Regulation 19 publication stage. The Council has produced an updated HRA for Regulation 22 submission stage.

North Downs Woodlands Special Area of Conservation

- 2.6.4 As part of the Interim HRA, and in line with NE's guidance, the change in average annual daily traffic (AADT) flows were assessed (both alone and in-combination) for all road links within 200 metres of a European site against the 1,000 AADT screening threshold. This indicated exceedances of the 1,000 AADT threshold for road links within 200m of European sites.
- 2.6.5 The Council appointed a consultant to obtain air quality modelling data to inform further work on the HRA. This data has been interpreted against the published critical levels and critical loads for each habitat type. The outputs of the air quality modelling have been analysed in the context of the HRA process. The air quality modelling required an ecological interpretation in an Appropriate Assessment of the North Kent Marshes European sites and the North Downs Woodlands Special Area of Conservation (SAC).
- 2.6.6 The updated HRA found no exceedances of the relevant critical levels for NO_x or ammonia at the North Kent Marshes European sites and concluded, following Appropriate Assessment of nitrogen deposition, that there would be no adverse effect on site integrity. However, adverse air quality impacts from the MLP, and in combination with other plans and projects, such as the Maidstone Local Plan Review (2021-38), at the North Downs Woodlands SAC were identified. In consultation with NE, and an agreed methodology, the Council commissioned air quality modelling (ref: A4.2) and an interpretation of the air quality modelling data in an Appropriate Assessment of the North Kent Marshes European sites and the North Downs Woodlands SAC (ref: A4.3). The Appropriate

Assessment concluded that a strategic approach to transport mitigation at the SAC is likely to reduce adverse air quality impacts; however, further evidence was required to demonstrate a strategic approach to transport mitigation at the SAC will be effective before a conclusion of no adverse impact on site integrity can be reached (ref: A4.3, page 53, paragraph 6.1.5).

- 2.6.7 Paragraph 3.12 of the air quality modelling (ref: A4.2) states that the 2041 Reference Case included the committed schemes within Medway (not constrained to Trip End Model Presentation Program (TEMPro) alongside those within neighbouring authorities (constrained to TEMPro). TEMPro would have provided a generic growth factor for a borough as a whole. However, chapter 3.3 of the Strategic Transport Assessment – Forecasting Report (ref: B18.1) states that the Lidsing Garden Community was included in the Reference Case; it was deemed ‘more than likely’ due to its status in the adopted Maidstone Local Plan Review (2021-38) and immediate proximity to the Medway administrative area. Furthermore, Figure 4-3 of the same report (ref: B18.1) shows that the internal roads and connections for the Lidsing Garden Community were included in the Reference Case. Therefore, the air quality modelling (ref: A4.2) is robust.

- 2.6.8 The Council’s Hearing Statement for Matter 1 is proposing the following additional wording as a main modification under ‘Sites of international importance for nature conservation’ within Policy S2 of the MLP (ref: A1), which is consistent with Policy LPRSP14(A) of the adopted Maidstone Local Plan Review (2021-38):

“The Council will work with Natural England to assess, monitor and if necessary, mitigate any recreation pressure at the North Downs Woodland SAC.

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.”

- 2.6.9 The Council is also proposing the following additional wording as a main modification under ‘Criteria’ within Policy SA7 of the MLP (ref: A1), which is consistent with Policy LPRSP4(B) of the adopted Maidstone Local Plan Review (2021-38):

“Development proposals in the Capstone Valley must demonstrate, either alone or in-combination with other relevant plans and projects, that they will avoid adverse effects on the integrity of the North Downs Woodlands SAC, due to air quality, with reference to Policy S2. Mitigation measures will be required where necessary and appropriate.”

- 2.6.10 In addition to the main modifications set out in the Council's Hearing Statement for Matter 1, the Council, with the support of NE, will propose the following additional wording as supporting text for Policy SA7, which is consistent with paragraphs 6.89 and 6.90 of the Maidstone Local Plan Review (2021-2038):

"The impact of new development on the integrity of the North Downs Woodlands SAC requires careful consideration, with reference to policy S2. Traffic modelling of the proposed development will be required to quantify the predicted nitrogen deposition on roads passing the SAC. If nitrogen deposition exceeds the screening criteria set out in IAQM guidance (1% of the SAC's critical load for nitrogen deposition), then mitigation will be required. Mitigation measures must be set out in a Mitigation Strategy, to be agreed by the council and Natural England, in consultation with the highway authorities, where relevant. Applications must clearly demonstrate through project-level HRA that the Mitigation Strategy is appropriate, can be feasibly implemented and will be sufficient to fully mitigate any identified adverse effects on the SAC. Mitigation measures may be provided on and/or off-site as appropriate and necessary.

In preparing the Mitigation Strategy, applicants should have regard to the following package of mitigation measures which may be deployed, either in isolation or in-combination, as and when necessary and appropriate for air quality. The mitigations, which are in no particular order and are not exclusive, are as follows:

- i. Green Travel Planning focussed on employment facilities, commercial facilities, schools and the use of transport connections within and adjacent to the development.
- ii. Traffic calming to discourage access/egress via Boxley and Bredhurst.
- iii. Provision of cycle and pedestrian facilities to encourage sustainable modes of transport via Boxley and Bredhurst.
- iv. On site measures to encourage/increase take up of low emission vehicles, such as EV charging points.
- v. HGV and other vehicle "site servicing" and "delivery route" management strategies.
- vi. Strategic road signage strategy.
- vii. Off-site planting at agreed locations and species.
- viii. The design of residential layouts and configuration of estate roads in a manner which discourages access/egress via Boxley and Bredhurst.
- ix. Typologies of development located at the southern sector of the site which generate lower car ownership levels of trip rates, i.e.: higher density apartment type accommodation, older persons accommodation.

- 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.”

- 2.6.11 NE supports the Council’s proposed additional wording as main modifications to Policy S2 and SA7.
- 2.6.12 During a meeting between NE and the Council’s HRA consultant on 7 September 2026, it was **agreed** that the proposed main modifications to Policy S2 and Policy SA7 would provide for effective mitigation. Therefore, an updated HRA on main modifications to Policy S2 and Policy SA7 would conclude no adverse effects on the integrity of the North Downs Woodland SAC.

North Kent Strategic Access Management and Monitoring Strategy

- 2.6.13 The Council recognises the evidence set out in the Bird Disturbance Study North Kent, 2010/2011² that identified the impacts of recreational disturbance on birds on international important intertidal habitats in North Kent.
- 2.6.14 The Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy, 2014³ (the Strategy) provides the evidence for the recognised effective strategic mitigation measures to address the impacts of recreational disturbance. This recommended a strategic approach across the Thames, Medway and Swale Estuaries in North Kent. The Strategy was reviewed and supported by NE.
- 2.6.15 The North Kent SAMMS Board was set up in 2016 and Bird Wise employed staff from 2017. The Bird Wise North Kent SAMMS is implementing the mitigation measures set out in the 2014 Strategy.
- 2.6.16 The Strategy addresses disturbance impacts and provides a strategic, cross-boundary solution to issues relating to disturbance, with the aims:
- To support sustainable growth whilst protecting the integrity of European wildlife sites from impacts relating to recreational disturbance.
 - To reduce the existing recorded recreation impact on birds on the European wildlife sites on the North Kent Marshes in order to meet duties relating to the maintenance and restoration of European sites, as required by Article 4(4) of the Birds Directive.
- 2.6.17 The Council is following the advice of NE⁴ in applying the SAMMS and is a member of Bird Wise board and the employer of the Programme Staff.

² Footprint Ecology (2011) Bird Disturbance Study North Kent. Available at: <https://northkent.birdwise.org.uk/wp-content/uploads/2018/02/Bird-Disturbance-Study-North-Kent-2010-2011..pdf> [Last accessed 9 September 2026]

³ Footprint Ecology (2014) Thames, Medway & Swale Estuaries – Strategic Access Management and Monitoring Strategy. Available at: <https://northkent.birdwise.org.uk/wp-content/uploads/2018/02/North-Kent-SAMMS-Report-2014.pdf> [Last accessed 9 September 2026]

⁴ Natural England, Letter to North Kent Environment Planning Group, 6 January 2015. Available at: https://www.medway.gov.uk/downloads/file/648/137979_ne_nkepg_letter_06_01_2015 [Last accessed 9 September 2026]

- 2.6.18 Bird Wise is recognised as best practice in delivering SAMMS in the Planning Advisory Service's Good practice advice and guidance for protected sites, 2026.⁵
- 2.6.19 The Strategy recommended monitoring intervals of 5 years for visitor studies and 10 years for disturbance monitoring.
- 2.6.20 Bird Wise has published updated strategies, monitoring information, annual reports and updated visitor surveys. The North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22⁶ carried out by Kent Wildlife Trust Consultancy Services reported positive impacts (see paragraph 4.1, page 19):
- “...the results from winter 2021/22 suggest that across the whole SAMMS area a greater proportion of dogs are now being walked on leads than when the same area was surveyed over ten years ago (Liley & Fearnley 2011). However, pertinently, this is within the context of the total number of dogs exercised along the coastline having approximately doubled. Although there is variation between locations, all else equal, the increasing proportion of dogs on leads can be taken to represent an indicator of success of the on going mitigation activities delivered through the Bird Wise project.”
- 2.6.21 This monitoring reported in the Bird Wise Mitigation Strategy 2024-2029⁷ (paragraph 9.6, page 16) illustrated that recreational activity on the coast during winter had increased by 34%. The levels of disturbance had not increased, and despite an overall increase in the number of dogs being walked, 40% of these were kept on a lead compared with 26% in 2011.
- 2.6.22 The annual Waterbirds in the UK report⁸ is published by BTO, RSPB and the JNCC looking at every SPA around the UK. Data for Thames Estuary, Medway Estuary and The Swale, shows that the bird population has remained stable to slightly increasing for the period 2013/14 to 2024/25, despite increased recreational activities.
- 2.6.23 This indicates that the mitigation measures delivered through SAMMS are helping to manage recreational pressure on the Special Protection Area / Ramsar site. However, it is understood that changes in bird populations are influenced by a range of wide environmental factors. Bird Wise is specifically addressing impact pathways of recreational disturbance.
- 2.6.24 The Bird Wise Programme is currently commissioning a ten-year full review of the SAMMS, as recommended in the 2014 Strategy. The scope

⁵ Planning Advisory Service. Good practice advice and guidance for protected sites. Available at: <https://www.local.gov.uk/pas/environment/protected-sites-strategies/good-practice-advice-and-guidance-protected-sites> [Last accessed 9 September 2026]

⁶ Kent Wildlife Trust Consultancy Services (2022) North Kent SAMMS – Bird Disturbance Surveys Winter 2021/22. Available at: https://northkent.birdwise.org.uk/wp-content/uploads/2023/07/North-Kent-Bird-Disturbance-Survey-2021-22-v4_final.pdf [Last accessed 9 September 2026]

⁷ Bird Wise North Kent (2023) Mitigation Strategy: 2024-2029. Available at: <https://northkent.birdwise.org.uk/wp-content/uploads/2023/07/Strategy-Final-V5-Dec24.pdf> [Last accessed 9 September]

⁸ British Trust for Ornithology (2026) Waterbirds in the UK 2024/25. Available at: <https://www.bto.org/sites/default/files/bto-rspb-jncc-naturescot-waterbirds-in-the-uk-webs-gsmp-report-2024-25.pdf> [Last accessed 9 September 2026]

of the work, which has been agreed with NE, will include an evidence review and visitor survey update and a SAMMS Strategy Review and Mitigation Update.

- 2.6.25 The Council's Plan Policy S3 requires development to contribute to the Bird Wise SAMMS. The strategy review will ensure that the Bird Wise is effective in providing strategic mitigation to recreational disturbance over the plan period.
- 2.6.26 On the advice of NE, the Council considers that there may be proposed development outside of the 6km zone of influence with potential to increase recreational disturbance. These are likely to be limited, and any requirement to contribute to the SAMMS will be in consultation with the Council and NE.
- 2.6.27 NE's position on the North Kent SAMMS, operating under the Bird Wise brand, is as follows:
- NE recognises that the Bird Wise SAMMS is delivering appropriate and effective mitigation on recreational disturbance and supports the strategic programme.
 - Bird Wise is delivering the Strategy that was developed to respond to the issues in the evidence base on recreational distribution in the North Kent estuary and marshes.
 - NE has agreed that the measures and approach in the Strategy are appropriate.
 - NE is an advisory member of the North Kent SAMMS Bird Wise Board.
 - NE has received regular reports on the implementation of the Strategy through the work of Bird Wise at Board meeting and through the Annual Report and has supported the work.
 - NE has advised on and agreed the scope of work to commission the ten-year review of the Bird Wise North Kent SAMMS.
 - NE recognises that the monitoring information provided by Bird Wise provides evidence of positive visitor behaviour change and that SAMMS is contributing to managing recreational pressure on the Special Protection Area / Ramsar site.
 - NE supports a bespoke approach on a case-by-case basis to consider the application of SAMMS to substantial scale development outside of the 6km zone of influence.
 - NE supports additional, bespoke measures, considered on a case-by-case basis for large developments within close proximity to the coastal designated sites to mitigate the impacts of recreational disturbance through measures such as site specific warden provision and high quality, accessible and inclusive semi-natural greenspace provision.

Hoo Peninsula Strategic Environmental Programme

- 2.6.28 The Hoo Peninsula includes important and sensitive areas for wildlife, including Special Protection Areas and Ramsar sites in the Medway

- Estuary and Marshes and the Thames Estuary and Marshes and Sites of Special Scientific Interest, of international and national significance.
- 2.6.29 The Council is planning for development on the Hoo Peninsula as part of a spatial strategy to meet its growth needs up to the 2040s, through a mix of brownfield regeneration, suburban and rural development.
- 2.6.30 The Council, in consultation with NE, recognises the need to manage planned growth to avoid, mitigate, or as a last resort, compensate significant harm to wildlife, and that this is best achieved through a strategic scheme. This scale of strategic mitigation is in addition to the Bird Wise North Kent SAMMS.
- 2.6.31 The Council has prepared evidence base work through a Hoo Peninsula Cumulative Ecological Impact Assessment (B22.2 Appendix 1)⁹ and an Assessment of impact on Nightingales (B22.2 Appendix 3)¹⁰ of developing in the vicinity of Chattenden Woods and Lodge Hill SSSI.
- 2.6.32 The Council has prepared policies (S2 and SA8) for the new Medway Local Plan 2041 that require developers of sites on the Hoo Peninsula to contribute to the implementation of a strategic environmental programme, proportionate to the scale and nature of the development and its proximity to sensitive sites. This Programme is included in the Infrastructure Delivery Plan for the Medway Local Plan 2041.
- 2.6.33 The Council, in consultation with NE, recognises that the Strategic Environmental Management Scheme (SEMS) (B22.2 Appendix 2)¹¹ developed with support from the Housing Infrastructure Fund provides appropriate measures, and is recognised as the basis for the Hoo Peninsula Strategic Environmental Management Programme (HPSEP). The strategic measures include new community parklands, wetlands and improved access that provide for recreation and habitat enhancement and creation. Measures such as the Cockham Community Parkland with its coastal views assist in deflecting additional visits to the sensitive coastline. Deangate Community Parkland includes opportunities to enhance nightingale habitat. The Hoo Wetlands project includes the creation and expansion of wetland habitats.
- 2.6.34 These projects are already in development, with planning consents in place and works underway in areas such as Deangate Community Parklands. Funding is being secured through developer contributions and external funding. There is certainty in the delivery of these mitigations, as evidenced by funding already in place and progress on implementation, such as Deangate Community Parklands nearing the completion of Phase 1.
- 2.6.35 The Council, in consultation with NE, is commissioning a review of the existing evidence and updated contextual information to prepare a costed

⁹ Medway Council (2025) Hoo Peninsula Strategic Environmental Programme Topic Paper. Available at: <https://medway.oc2.uk/docfiles/37/Hoo%20Peninsula%20Strategic%20Environmental%20Programme%20Topic%20Paper%20v2.pdf> [Last accessed 9 September 2026]

¹⁰ Ibid

¹¹ Ibid

delivery plan of measures for implementation in the strategic programme. This will ensure that the strategic measures can evolve appropriately to address potential impacts.

2.6.36 The Council is progressing this work in partnership with NE, environmental bodies, landowners and developers on the Hoo Peninsula. This partnership will evolve into governance arrangements for the Programme delivery.

2.6.37 NE supports the principle of implementing the HPSEP, or Programme, to address additional impacts arising from planned growth in addition to the measures provided in the North Kent SAMMS. This support recognises that:

- The HPSEP will be based on the measures identified and developed through the Council's Strategic Environmental Management Scheme (SEMS) and its supporting evidence base, including Hoo Peninsula Cumulative Ecological Impact Assessment (B22.2 Appendix 1)¹² and an Assessment of impact on Nightingales (B22.2 Appendix 3).¹³ This includes known key sites and projects such as Deangate and Cockham Community Parklands and Hoo Wetlands.
- The framework of the Programme is acceptable in identifying appropriate mitigation measures against adverse impacts on the environment but NE advise that further detail is required.
- NE consider that the costed programme of evidence-based measures and Policy requirements (Policies S2 and SA8) in the submitted Medway Local Plan 2041, and Infrastructure Delivery Plan, are likely to provide certainty in avoiding and mitigating environmental impacts (subject to further detail, discussion and agreement) with the exception of impacts to the Chattenden Woods and Lodge Hill SSSI at present.
- The planned review is appropriate to refresh the evidence and contextual information, including the Kent and Medway Local Nature Recovery Strategy, and provide certainty on the mitigation measures and provide for the evolution of the Programme.
- NE will review the strategy once it is available and would expect it to be consulted upon before the close of the Examination to enable its consideration through the examination process. Any agreement will be subject to the mitigation measures satisfactorily addressing identified impacts, the resolution of any outstanding matters, and any necessary amendments to policy wording.
- NE will be a partner/advisor to the Programme.

Marine Management Organisation

2.6.38 In response to the Council's Regulation 18 consultation, the Marine Management Organisation (MMO) set out the need to refer to relevant licensing requirements, the South East Marine Plan (2021), the Marine and Coastal Access Act 2009 and the Marine Policy Statement in addition

¹² Ibid

¹³ Ibid

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

2.7 Schools

- 2.7.1 A new secondary school of at least 6FE, which will be part-funded by the Lidsing Garden Community, is required early in the plan period. The need for the secondary school is generated by planned development at Lidsing and in the Capstone Valley area. Abbotts Court Farm, which is owned by the Council, has been identified as the optimum site to accommodate a new secondary school, subject to compensation for the loss of development value.
- 2.7.2 At the time of writing, the Council is engaged in negotiations with the land owner of most site allocations in the Capstone Valley, F D Attwood & Partners, regarding this matter. The Council is cooperating with the neighbouring Local Education Authority, Kent County Council.
- 2.7.3 The delivery of a new secondary school, as cross border strategic infrastructure, remains a matter **under discussion**.
- 2.7.4 In addition to a primary school as part of the East Hill development, a new primary school, phased in the latter part of the plan period, is likely to be located within the Mill Fields site. A new primary school is proposed within the Lidsing Garden Community within the Maidstone borough, which may be facilitated by the relocation and expansion of an existing primary school within the Kent County Council area.
- 2.7.5 For the avoidance of doubt, the Lidsing Garden Community falls entirely within Maidstone Borough Council's administrative boundary and Kent County Council's Local Education Authority area; it does not lie within Medway Council's jurisdiction.
- 2.7.6 The Lidsing Garden Community of up to 2,000 homes, whilst within the Administrative area of Kent County Council as Local Education Authority is geographically located closer to existing secondary school provision within Medway and the adopted travel to school patterns of existing residents. As such it is agreed in principle that the additional secondary school provision required to meet the needs of the garden community is also located within Medway, enabling appropriate and more sustainable access to school places within the local area. The mechanism for this remains in discussion but the principle that Kent County Council will seek to secure developer contributions from the garden community for us by Medway Council is agreed. Kent County Council does not hold a view on the principle of compensation for the loss of development value at Abbotts Court Farm, the County Council will engage in discussion regarding this but considers any compensation sums must be secured from contributing

housing developments and cannot be paid by funding from Kent County Council.

- 2.7.7 Policy SA6 (Land West of Strood) requires two primary schools, an expansion of an existing primary school and a secondary school. The precise locations and forms of entry are **under discussion** with Kent County Council, Gravesham Borough Council and site promoters.

2.8 Historic environment

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

2.9 Strategic Road Network – M2 Junction 1

- 2.9.1 M2 Junction 1 is located to the west of Medway where the M2 merges with the A2 and the A289.
- 2.9.2 M2 Junction 1 emerged as a strategic planning matter following representations received from National Highways in determining the planning application for MedwayOne (former Kingsnorth Power Station).
- 2.9.3 National Highways reviewed the applicant's Transport Assessment and in response noted concerns about both safety and congestion at M2 Junction 1, specifically the northbound off-slip and the southbound on-slip links. Following an initial assessment, National Highways considered that the junction had limited spare capacity, i.e. 60 movements during the morning or evening peak travel period. The junction would need to be improved to accommodate further development once this spare capacity has been exceeded.
- 2.9.4 The Council, as the local planning authority, resolved to approve the application for MedwayOne subject to a Section 106 agreement and Planning Condition 7. Condition 7 was proposed by the applicant and accepted by National Highways to facilitate an early consent, with all

parties agreeing that a further round of more detailed and bespoke modelling work would commence post-consent.

- 2.9.5 Having reviewed subsequent technical work produced by the applicant, National Highways advised the Council that there would be no objection to the discharge of Condition 7 attached to the planning permission for MedwayOne. In other words, following a discharge of condition application, the trip cap no longer applies.
- 2.9.6 The Lower Thames Crossing (LTC) will divert traffic routing to/from the Channel Tunnel Terminal and the Port of Dover away from the Dartford Crossing. This will exacerbate the limited capacity – particularly via M2 junctions 1, 2 and 3 – and generate more traffic locally once travel across the River Thames becomes more attractive. This is acknowledged in paragraph 7.5.8 of the project's Transport Assessment. However, the project does not include changes to the northbound off-slip and southbound on-slip links at M2 Junction 1.
- 2.9.7 Figure 2 shows the LTC's Order Limits (red line) which straddle the northbound off-slip and the southbound on-slip links (pink labels). The links are part of Kent County Council's highway network.

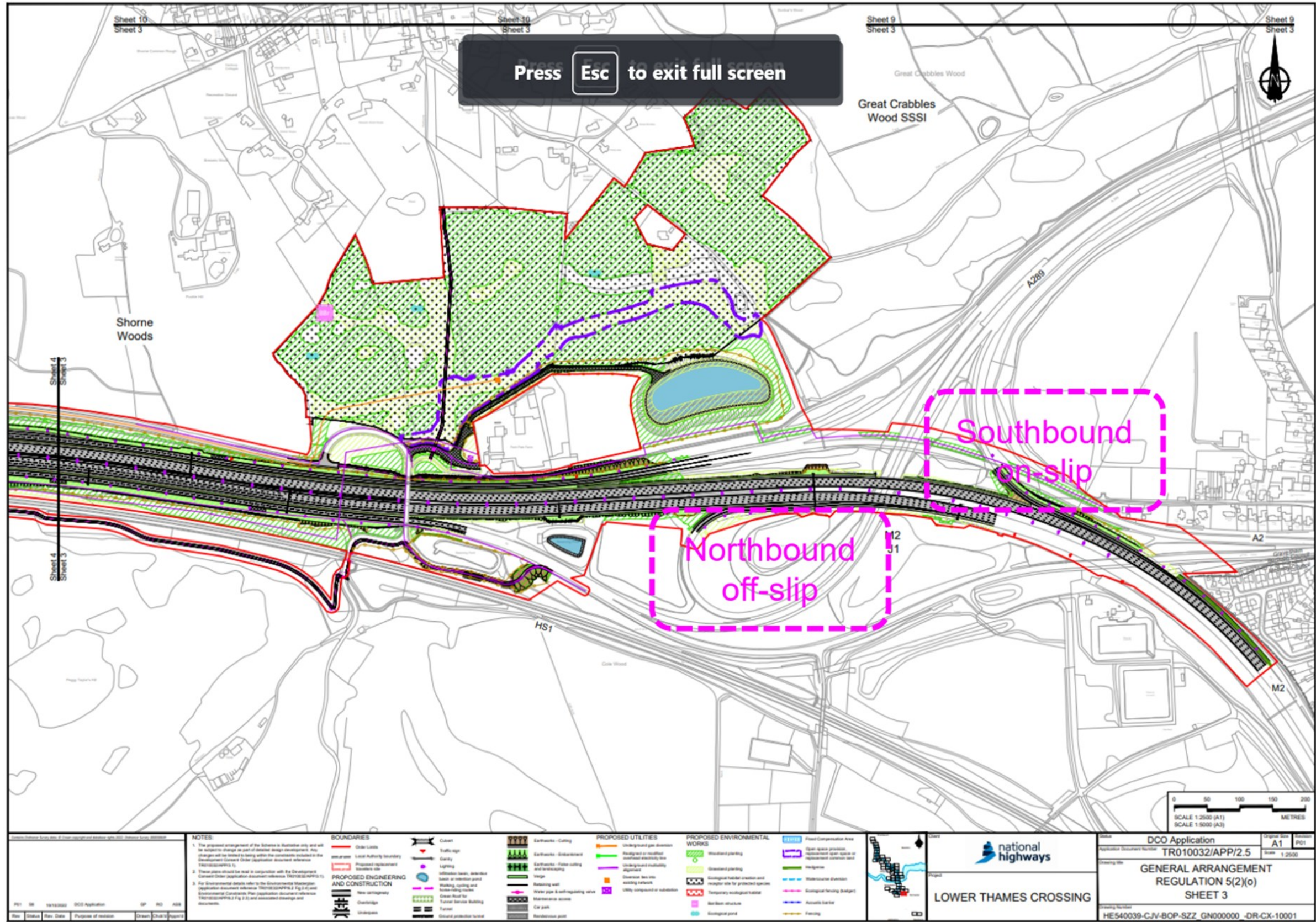


Figure 2: LTC Order Limits (With 'Northbound off-slip' and 'Southbound on-slip' annotation added)

- 2.9.8 Drawing on the Applicant's submission documents, the Council's Local Impact Report noted the increase in the traffic flows on the M2 Junction 4 to A2/A2018 Dartford town centre route. An assessment on behalf of the Council also identified an increase in traffic flows on the M2, with approximately 1,350 Passenger Car Units (PCUs) westbound and 800 PCUs eastbound in the AM peak in 2030. This would seemingly affect the capacity and safety of traffic to merge and diverge.
- 2.9.9 The Council's representations during the LTC Examination repeatedly highlighted this strategic planning matter.
- 2.9.10 Following the LTC's granting of development consent, traffic modelling scenarios as part of the Strategic Transport Assessment assumed the LTC will be operational in 2041.
- 2.9.11 A third party (Stantec on behalf of Uniper) provided a design to the Council which shows a proposed layout for the M2 Junction 1 southbound merge. The Council appointed Jacobs to:
- determine whether the design could satisfy the relevant design standards;
 - determine whether the design could satisfy the relevant safety standards; and
 - produce a high-level order of magnitude costs.
- 2.9.12 The consultant found that the design would provide additional highway capacity for the merge; however, a list of departures from the relevant design standards were identified. The consultant recommended a more in-depth design to remove the majority of the departures. The consultant estimated a maximum cost of £12 million. However, due to the number of departures from standards, it is not possible to predict with any certainty if the cost would increase significantly. The potential requirement to alter a bridge structure is a key component of this uncertainty.
- 2.9.13 National Highways considered the consultant's reports. National Highways acknowledged the list of departures and required additional drawings (cross-section, merge layout, diverge layout and visibility). National Highways' stated position is that any further submissions must set out the justification for departures and any associated individual and cumulative implications for the safety, operation (including future maintenance) and reliability of the SRN. National Highways' caveated response considered the order of magnitude costs to be reasonable for this stage of design.
- 2.9.14 National Highways has considered the latest iteration of the Council's Strategic Transport Assessment - Merge and Diverge Assessment. National Highways stated: 'The analysis of the M2 Westbound off-slip identifies that no improvement is required as a result of the Local Plan traffic. This is accepted on the basis of the supporting information ... The assessment of the A289 Southbound Diverge (Hasted Road) indicates an increase in the requirements from type A1 to type D in the reference case for the AM, and to type B in the PM. With the addition of Local Plan traffic the requirement becomes type D in both the AM and PM peaks. The evidence therefore indicates that the [Medway] Local Plan itself will trigger

a degree of improvement in one of the two peaks, but that the “primary” requirement comes from other committed development and background growth. We therefore consider that the performance of this arm of the junction will need to be kept under review via the proposed “monitor and manage” strategy.’

- 2.9.15 Following a meeting between National Highways, Kent County Council, Gravesham Borough Council and the Council on 17 July 2026, National Highways required additional analysis, therefore this matter remains **under discussion**.

2.10 Strategic Road Network – M2 Junction 4

- 2.10.1 A fourth arm of the grade separated roundabout forming part of M2 Junction 4 will be funded and delivered by the Lidsing Garden Community development in the Maidstone borough. A connection between North Dane Way and M2 Junction 4 will provide for an orbital bus route traversing both administrative areas.
- 2.10.2 Kent County Council’s Regulation 19 representations queried the reliance of site allocations in the Capstone Valley on the Lidsing Garden Community to deliver the improvements to M2 Junction 4; for example, if the Lidsing Garden Community is not started or stalls ahead of the delivery of improvements to M2 Junction 4.
- 2.10.3 Kent County Council’s representations noted that future development in the Capstone Valley depends on the Lidsing Garden Community coming forward. The Council will need to demonstrate how future development in the Capstone Valley could come forward if the Lidsing Garden Community, and the associated M2 Junction 4 scheme (fourth arm), does not come forward. The Council intends to commission a ‘Monitor and Manage Mitigation Strategy’ to address the evolving certainty of off-site highway mitigations and local impacts, including at Bredhurst and Boxley. The Council’s consultants have identified an interim scheme and indicative costings; however, at the time of writing, Kent County Council has not had the opportunity to review the latest versions of the Strategic Transport Assessment; therefore, this matter is **under discussion**.
- 2.10.4 Traffic and air quality modelling undertaken in support of the Maidstone Borough Local Plan Review demonstrated that adverse air quality effects on the integrity of North Downs Woodlands Special Area of Conservation (SAC) can be avoided, alone or in combination with other plans or projects. The modelling approach took account of mitigation associated with traffic calming along Boxley Road / Lidsing Road, and the new link road for Lidsing Garden Community. Similarly, as part of the Habitats Regulations Assessment for the Medway Local Plan, adverse air quality impacts at the North Downs Woodlands Special Area of Conservation (SAC) have been identified. A strategic approach to transport mitigation at the SAC is likely to reduce these impacts. This will require ongoing cooperation (see section 4); therefore, this matter remains **under discussion**.

- 2.10.5 Analysis of a combined housing trajectory for both the Maidstone and Medway local planning authority areas indicates that the scheme is required early in the plan period.
- 2.10.6 Given that the area of the works is less than the Development Consent Order threshold of 15 hectares, it will be progressed under a funding agreement between the development promoter and National Highways under Section 278 of the Highways Act. The timeline for a Section 278 agreement involves several stages, from initial application to completion and maintenance, and can take several months to complete.
- 2.10.7 The Council has requested an update from Maidstone Borough Council and the applicant regarding the progress of the proposed scheme. The delivery of improvements to M2 Junction 4 remains a matter **under discussion**.

2.11 Major Road Network – A229 Blue Bell Hill

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

- 2.11.6 In response to the Council's Regulation 19 consultation, Tonbridge and Malling Borough Council noted that the scheme was not included in the Council's Infrastructure Delivery Schedule. Meanwhile, National Highways required a more detailed analysis of cumulative impacts at M2 Junction 3, accounting for the removal of queues associated with the mitigation scheme for M2 Junction 4, along with the possible need to undertake a sensitivity test depending on the progress of Kent County Council's emerging business case for the Blue Bell Improvement Scheme. A more detailed analysis has been set out in the latest (submission) version of the Strategic Transport Assessment, which has informed an update to the Council's Infrastructure Delivery Schedule; proportionate, viable developer contributions towards the Scheme will be sought or an alternative which would collectively mitigate cumulative development impacts and thereby avoid a piecemeal approach. Until the funding and delivery mechanisms are confirmed this matter will remain as **under discussion**.
- 2.11.7 In response to the Council's 'Supporting Evidence Documents' consultation, National Highways stated: 'Our Regulation 19 response also requested additional analysis of queue length changes at M2 Junction 3 (Taddington and Lord Lees roundabouts) resulting from [Medway] Local Plan traffic. This analysis is presented on pages 18 and 19 of the submitted report. We have reviewed this information and consider that it provides appropriate clarity on the change in queue lengths, and that this does not constitute a requirement for specific mitigation to be included as part of the mitigation measures for the Medway Local Plan.'

2.12 Air quality (human health)

- 2.12.1 The Air Quality Management Area (AQMA) on the A2 via Newington has been identified as a strategic planning matter in DtC meetings with Swale Borough Council and Kent County Council, given the established commuting flows between Medway and Swale.
- 2.12.2 As part of the Strategic Transport Assessment, the Forecasting Report (2024) included site RSE10, a large-scale housing development to the east of Rainham. The Forecasting Report (2024) highlighted adverse impacts at the High Street and Moor Street (A2) / Meresborough Road junction, which is part of an AQMA. Planning officers considered that, due to the constraints of the local road network, these adverse impacts could not be mitigated. Site RSE10 was not selected for allocation.

2.13 Flood risk

- 2.13.1 The Council published a Strategic Flood Risk Assessment (Level 1 and 2) (May 2025) (SFRA), which considers the risk of flooding from all sources to inform a Sequential Test and an Exception Test, and provides guidance for the completion of site-specific flood risk assessments to support the Regulation 19 consultation.
- 2.13.2 In response to the Council's Regulation 19 consultation, the Environment Agency raised concerns about:

- the model used as the basis for the SFRA;
- the application of the Sequential Test and the Exception Test in the Council's site selection process; and
- the need to identify necessary flood defences and their associated funding and delivery.

- 2.13.3 The SFRA that was published to support the Council's Regulation 19 consultation was not based on the latest flood risk information from the North Kent Coast Flood Domain 2 Model, and this would render the Sequential Test and the Exception Test outdated. However, the North Kent Coast Flood Domain 2 Model was unavailable when the Council's consultant produced the SFRA. The Council's consultant subsequently updated the SFRA (November 2025) based on the North Kent Coast Flood Domain 2 Model, along with the Sequential Test and the Exception Test, and this has been shared with the Environment Agency. In addition, following engagement with the Environment Agency, the Council's planning officers have produced a Site-specific Flood Risk Topic Paper. The topic paper illustrates how site allocation boundaries, often derived from land promoters in the early plan-making process, do not reflect the site-specific areas to be developed, which reduces the development area subject to high flood risk.
- 2.13.4 On 14 January 2026, the Environment Agency provided written comments by email on the 'Site-Specific Flood Risk Topic Paper' (ref: B22.3): 'We acknowledge the responses that Medway Council have made in section 2 of this topic paper. We will continue to collaborate with Medway Council to update the assessment of the flood defences. However, we still have concerns regarding the following sites with large areas within flood zone 3b CHR14, RWB2, SNF15. Strategic flood defences are required prior to development in Chatham, St Mary's Island and Strood. There are several sites in Strood including SNF34 and SNF38 which would benefit from these defences. While the latest comments from Medway Council go some way to mitigate the issue of development sites at flood risk, we do continue to have some concerns about the deliverability of some of these site allocations which are likely to rely on building outside of flood zone 3b, or rely on the timely delivery of strategic flood defences to enable development sites.'
- 2.13.5 The Environment Agency's response concerning the 'Review of updated SFRA data and implications for the Regulation 19 Sustainability Appraisal, published as part of the Council's 'Supporting Evidence Documents' consultation, is available in in MLP/ED16A.
- 2.13.6 The Council recognised the Environment Agency's concerns about the need to identify necessary flood defences and their associated funding and delivery. The Council commissioned an appraisal of Medway's flood defences to aid ongoing, long-term collaboration with the Environment Agency. This work will update an assessment of flood defences conducted in 2011, and inform coordination with the Medway Estuary and Swale Flood and Coastal Erosion Risk Management (2019) and the Thames Estuary 2100 Plan (2012). On 13 August 2026, the Environment Agency provided written comments by email: 'We agree with the findings

of the Medway Flood Defences High Level Appraisal (referenced above) and the conclusions it draws regarding the need for flood defence works in the Medway Council area. However, our position currently remains that we find the 'Medway Local Plan 2041' and the associated evidence base 'unsound'. However, the Council has submitted what it considers to be a sound plan. This matter will require ongoing, long-term collaboration; it is **under discussion**.

- 2.13.7 The Environment Agency's concerns about flood defences may justify the need for an alternative 'stepped' housing requirement, which has been set out in the Housing Delivery Topic Paper.
- 2.13.8 The Environment Agency's representations included suggested changes to policies, including the criteria and subsequent design principles within site allocation policies. The Council recognises the need for most of these changes; this matter is **agreed** because it could be resolved through modifications to the plan.

2.14 Community facilities

- 2.14.1 The Playing Pitch Strategy (PPS) is based on an audit and assessment of the supply and demand for existing and future playing pitches, in consultation with local clubs, national governing bodies of sport and other users and providers. The PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. The associated Sports Facility Strategy and Action Plan provide an assessment of need up to 2035 and a phased approach to planning. It sets out opportunities for improvements in a range of sports facilities across Medway. The PPS was finalised in October 2019 and covered the period 2018 to 2035.
- 2.14.2 In response to the Council's Regulation 19 consultation, Sport England noted that a PPS and a Built Facilities Plan is to be commissioned in January 2026 and completed in June 2026. These documents are to be finalised with external review and input. The production of the PPS and the Built Facilities Strategy is dependent on receiving information from stakeholders. The PPS and the Built Facilities Strategy are subject to change to allow for review by Sport England and the steering group. The associated action plans are being progressed through specific engagement with clubs and operators. The methodology has followed the latest Sport England guidance. Sport England's representations suggest the latest evidence base could require changes to policies. The Council recognises the potential need for changes to policies; this matter is **agreed** because it could be resolved through modifications to the plan.
- 2.14.3 The NHS Kent and Medway ICB's response to the Council's Regulation 19 consultations noted:
- The NHS Kent and Medway's Developer Contribution Guide (2025) should be reflected in the Council's Developer Contributions Guide.
 - The need for a new primary and community healthcare facility to meet future demands in the 'River Waterfront' area at no cost to the NHS.

- NHS Kent and Medway ICB, with the Medway and Swale Health and Care Partnership, will carry out a refreshed feasibility and infrastructure needs assessment covering Strood Town Centre, Strood West and Frindsbury Peninsula.
 - Despite being promoted for redevelopment by NHS Property Services, the availability of the site allocation SNF20 is not confirmed. The redevelopment of the site cannot be progressed until it is declared surplus by NHS Kent and Medway ICB.
 - The need to identify opportunities for a future healthcare facility in the Capstone Valley, taking account of the Lidsing Garden Community. Meanwhile, a GP surgery should be removed from site allocation LW6.
 - A 'health hub' should be removed from site allocation RN9; while the existing Rainham Healthy Living Centre could be reconfigured and maximised with existing development contributions.
 - The need to clarify anticipated housing delivery on the Hoo Peninsula; this will inform the potential need for expansion of current healthcare facilities to meet interim demands, in advance of a new integrated healthcare facility at no cost to the NHS.
- 2.14.4 There will be ongoing, long-term collaboration between the Council and NHS Kent and Medway ICB; such matters are **under discussion**. This will include the continuing cross border liaison with Maidstone Borough Council in planning for the health care facilities for new communities in the Capstone Valley and the adjacent Lidsing Garden Community.

2.15 Minerals supply

- 2.15.1 An agreed Statement of Common Ground with Kent County Council on minerals supply and waste management is presented in a separate document (ref: A12.4).

2.16 Waste management

- 2.16.1 The proposed SoCG with Thurrock Council dated 2 June 2025 (ref: A12.5) concerning strategic waste management was reissued with minor updates to Thurrock Council on 21 August 2026. Thurrock Council opened its Regulation 19 consultation on 2 September 2026. The Council has requested an update from Thurrock Council.
- 2.16.2 An agreed Statement of Common Ground with Kent County Council on minerals supply and waste management is presented in a separate document.

3 Governance Arrangements

3.1 Effective cooperation

- 3.1.1 The Duty to Cooperate placed a legal duty on local planning authorities and county councils in England, and prescribed bodies, to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plans. The Council's Duty to Cooperate Statement (ref: A11) outlines how the Council prepared the Medway Local Plan 2041 in accordance with Duty to Cooperate legislation.
- 3.1.2 In line with new legislative requirements, the Council will maintain effective cooperation on strategic cross-border issues. The Council's Strategic Infrastructure Planning and Implementation Group may identify other strategic planning matters that would require ongoing cooperation with prescribed bodies.

3.2 Main points of contact

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

4 Timetable and Ongoing Cooperation

4.1 Timetable

4.1.1 The table below shows a combined plan-making timetable for neighbouring local planning authorities.

Local Planning Authority	Date of adopted development plan documents	Review start date	Regulation 18 date(s)	Regulation 19 date	Submission date
Medway	Medway Local Plan 2003 Kent Waste Local Plan 1998 Kent Minerals Local Plan 1997: Chalk and Clay Kent Minerals Local Plan 1997: Oil and Gas Kent Minerals Local Plan 1993: Construction Aggregates Written Statement Kent Minerals Subject Plan 1986: Brickearth Written Statement	April 2023	September 2023 July 2024	June 2025	December 2025
Gravesham	Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014) Saved policies from Gravesham Local	September 2014	April 2018 October 2020	April 2026	December 2026

	Plan First Review (1994)				
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				
Tonbridge and Malling	Core Strategy (2007)	July 2021 plan making recommenced following withdrawal of previous draft Local Plan from Examination	Reg 18 stage 1 October to November 2022	Reg 19 September to October 2026	By 31 December 2026
	Development Land Allocations DPD (2008)		Reg 18 stage 2 November 2025 to January 2026		
	Tonbridge Central Area Action Plan (2008)				
	Managing Development and the Environment DPD (2010)				
	Saved policies from Tonbridge and Malling Borough Local Plan (2008)				
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				
Swale	Local Plan - Bearing Fruits 2031 (2017)	July 2017	Reg 18 Vision, Objectives and Development Management Policies January 2026 to February 2026	August to September 2026	December 2026
	Kent County Council Minerals and Waste Local Plan 2024-30 (2025)				

4.2 Ongoing Cooperation

- 4.2.1 Development proposals for land to the west of Strood, together with Chapter Farm in the Gravesham borough, will adhere to a landscape-led masterplan, to be approved by the Council and Gravesham Borough Council.
- 4.2.2 The Council will consult Maidstone Borough Council in the applicant's preparation a green infrastructure strategy, an open space strategy and an approved masterplan for the Capstone Valley. The Council will engage in consultation with Maidstone Borough Council on the preparation of the Lidsing Garden Community SPD and associated planning applications.
- 4.2.3 The Council will work with Kent County Council to deliver a new secondary school at Abbotts Court Farm.
- 4.2.4 The Council will consult Tonbridge and Malling Borough Council on the anticipated planning application for mixed-use development comprising commercial uses (office and research), a care home and retirement units at Innovation Park Medway. The timing of LDO revocation will also be agreed alongside the progression of respective local plans.
- 4.2.5 The Council will work with NE to assess, monitor and if necessary, mitigate any recreation pressure at the North Downs Woodland SAC. 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, along with Maidstone Borough Council, on coordinating any strategic mitigation required to minimise air pollution at the SAC.
- 4.2.6 Planning officers from the Council and Maidstone Borough Council will be engaged in pre-application activity to ensure development proposals do not result in adverse effects on the integrity of the North Downs Woodland SAC.
- 4.2.7 The Council's planning officers will continue to work with Historic England and Kent County Council in preparing an update to the Heritage Strategy.
- 4.2.8 Monthly meetings will continue to be held between representatives of the National Highways Spatial Planning Team and the Council and their respective traffic modelling consultants, if required. On occasion, representatives from Kent County Council and neighbouring local planning authorities will continue to be invited to the monthly meetings.
- 4.2.9 For M2 Junction 1, the Council and Gravesham Borough Council have requested a fee proposal from Jacobs to:
 - Determine whether the concept design for M2 Junction 1 could accommodate the combined traffic generated by sites allocated for development in the submitted Medway Local Plan and the emerging Gravesham Local Plan.
 - Determine when, i.e. what year, the concept design for M2 Junction 1 is required, based on the annual housing/growth trajectories already supplied by both the Council and Gravesham Borough Council.
 - Quantify how much traffic from site allocations across Medway and Gravesham would route via M2 Junction 1. This should be compared to

background growth. This could inform how the mitigation scheme for M2 Junction 1 could be delivered, i.e. via a Section 278 agreement attached to a strategic site allocation or through pooled Section 106 agreements and delivered by the local transport authority.

- Present the outputs and conclusion in a concise technical note.
- 4.2.10 For M2 Junction 4, the Council will collaborate with National Highways, Kent County Council and Maidstone Borough Council on the following sequential tasks:
- Review of the additional technical information relating to the M2 Junction 4 proposals specific to the Medway Local Plan 2041.
 - Preparation of any additional supporting information which may be identified as a result of this review.
 - Preparation of a monitor and manage strategy to address uncertainties around the timing and delivery of wider off-site mitigation measures, particularly those affecting the communities of Bredgar and Boxley.
- 4.2.11 The Council will continue to cooperate with local authorities to support the delivery of the Blue Bell Hill Improvement Scheme, which is being led by Kent County Council.
- 4.2.12 The Council is a member of the Kent and Medway Air Quality Partnership. Data and information about air quality throughout Kent is combined and shared through the partnership's dedicated website, KentAir.
- 4.2.13 The Council recognises the Environment Agency's concerns about the need to identify necessary flood defences and their associated funding and delivery. The Council's appraisal of flood defences will need to be coordinated with the Medway Estuary and Swale Flood and Coastal Erosion Risk Management (2019) and the Thames Estuary 2100 Plan (2012). This matter will require ongoing, long-term collaboration.
- 4.2.14 The Council will continue to liaise with Sport England to finalise an updated PPS and a Built Facilities Plan. The PPS and Built Facilities Strategy are to be finalised with external review and input. The production of the PPS and the Built Facilities Strategy is dependent on receiving information from stakeholders. The PPS and the Built Facilities Strategy are subject to change to allow for review by Sport England and the steering group. The associated action plans are being progressed through specific engagement with clubs and operators. The Council published draft summaries of the Built Facilities Strategy (ref: MLP/ED11A) and Playing Pitch Strategy (ref: MLP/ED11C) as part of the 'Supporting Evidence Documents' consultation.
- 4.2.15 The Council will continue to liaise with NHS Kent and Medway ICB in planning for new and expanded healthcare infrastructure in Medway. Regular meetings between the Council's Planning and Public Health teams and NHS Kent and Medway ICB have informed the updates to the Infrastructure Delivery Plan and cross border discussions in planning for strategic sites. Health partners will be invited to relevant meetings of the Council's Strategic Infrastructure Planning and Delivery Group. Site allocation SNF20 will be subject to collaboration between both NHS

Property Services (as freehold owners) and NHS Kent and Medway ICB
as the local health commissioners.