

From: [REDACTED]
To: [policy, planning](#)
Subject: Medway Local Plan - Regulation 18 Consultation - Objection
Date: 08 September 2024 23:15:26

Dear Sir/Madam

I am deeply concerned about proposals for an additional 4000 houses in Capstone Valley. This area must be protected and preserved as countryside as it is the last remaining green space in the area which is vital for the health and wellbeing of thousands of residents who already live here. Please do not underestimate the importance of open countryside which forms a wildlife corridor linking to adjacent areas in the AONB and beyond. I also have severe concerns regarding the capacity on our roads for the many thousands of vehicles a large development will create and the devastating effect this will have on air quality.

Regards

Vanessa

Councillor Vanessa Jones

Independent Cllr – Boxley Downs Ward

Green Independent Alliance

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent ME15 6JQ

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From: [REDACTED]
To: [policy, planning](#)
Subject: FW: LP Comments
Date: 08 September 2024 23:20:02

Had an out of office for [REDACTED] so sending to the alternative address to ensure delivery before the cut off.

Thank you.

Trevor

From: [REDACTED]
Sent: 08 September 2024 23:18
To: [REDACTED]
Subject: LP Comments

Dear [REDACTED] apologies for the lateness of submission and for not going through the portal. My diverse comments did not seem to fit within those parameters. Apologies too if any of these have been covered in the draft documents or if I have misunderstood – it was very challenging to take everything onboard on my readthroughs.

Andrew and the Group at Regen OSC have already made submissions with which I broadly concur so only wish to add the following:

- It is difficult to fit comments within the shoe horned boxes of the consultation – there should be an option D for residents. Most folk would tend to respond they want a blended approach with brownfield over green but the stacking of this option with the obliteration of viable economic areas such as Chatham Docks will create a (deliberately?) misleading statement that Chatham Docks should go and be replaced with a soulless shoe box mini town according to people's preferences.
- The Plan does not seem to take account of the ONS predicted growth figures for Medway which indicate substantially fewer homes would be required to cater for the smaller population increases.
- Complete absence of the lessons learned from Covid in terms of the mental health needs of residents for their own outdoor space and how myriads of small box like apartments promoted loneliness and isolation when folk needed the support of a recognisable community.
- Inconsistencies between current Council's employment policies with those espoused in the Plan. The mothballing of the Innovation Park Medway sites and the abandonment of the working docks at Chatham do not signal that Medway is a place to do business and will discourage investment.
- A reality check on Medway's public transport offer, it is not TFL, even city centre dwellers will still want and need to own a car, a need to ensure increased parking provision in town

centre development sites.

- The modelling within the Strategic Transport Assessment is impenetrable to lay men, the impact of the Lower Thames Crossing seems to be woefully understated at the key A228 and A229 junction sites.
- Needs to have a clear plan for the protection of general aviation and continuing operation and modernisation of Rochester Airport and include within the cultural and heritage strand an aviation heritage museum in conjunction with MAPS.
- Parking Space sizes, does not seem to take account of generally larger vehicles and the extra off road space required for home charging points.
- Restrictive policies on buy to lets to prevent whole apartment blocks being bought by overseas investors who will price local residents out.
- New builds should be expected to have solar panels/green roofs or a combination thereof as standard.
- Fences on new build estates should have hedgehog highways in concrete baseboards.
- Developments should incorporate drainage ditches where possible both for structural reasons and because these have huge biodiversity boosts.
- The national target for a new development is to increase the biodiversity on a site by 10%. Medway should set a more ambitious (but still easy) target of 20% uplift, ensuring that new developments have a mix of native trees and hedges installed in communal areas (and also in the usually empty gardens). Incorporate building features like bee bricks, bug hotels and nesting opportunities.
- Promote planting in public-sphere spaces like schools, churches, community centres and on the high streets. When bulb planting, plant native bulbs that have wildlife benefits like crocuses and use species like narcissus pseudonarcissus where possible. New trees likewise should be native favouring species that flower and berry.
- Abandon shared ownership as the main delivery mechanism of "affordable" housing. Deliver new social rent and intermediate rent homes. Deliver houses not flats as much as is feasible. Set a concrete definition for affordable homes in the area as 10% lower than market value is rarely affordable.
- Right to light should become a material planning consideration.
- Where is the ambition for the existing street scene and town planning re the 111,500 properties Medway already has? The Local Plan should afford an opportunity to introduce policies on inter alia (1) the protection of bungalows: removing permitted development rights so that the stock cannot be diminished – all very well for the new builds but there will not be many built and the attrition of the existing stock is unsustainable if we wish to keep downsizing as a viable option for Medway residents. (2) Homes for Medway

residents: priority to be provided to Medway's existing first time buyers, an influx of wealthier Londoners will only make it harder for young Medway folk to stay in the area and risks community cohesion. (3) Solar: Solar panels on public facilities like bus stops, car parks, council buildings etc. and how to make it a consideration on extensions over a certain size.

Kind regards.

Trevor

Cllr Trevor Clarke
Member for Fort Horsted

[REDACTED], ME1 [REDACTED]
[REDACTED]

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From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: Joint Consultation Response on the Medway Local Plan from Princes Park Ward Councillors.
Date: 09 September 2024 07:10:27

Dear Planning Policy Team,

Joint Consultation Response on the Medway Local Plan from Princes Park Ward Councillors.

Please accept our apologies for the late submission - we would be very grateful if you could use your discretion to include this comment.

As elected representatives for the Princes Park ward, we would like to submit our response to the ongoing consultation on the Medway Local Plan.

We appreciate the Council's efforts in preparing this plan, which will shape the future of Medway up to 2041. However, we have significant concerns regarding the proposed developments, particularly in relation to Princes Park and the surrounding areas, notably Capstone Valley.

Impact on Capstone Valley – Medway's Green Lung

Capstone Valley is a critical natural asset, often referred to as Medway's "green lung" due to its rich biodiversity and the essential role it plays in protecting our communities from urban sprawl. This area is not just a green space; it is a vital ecological corridor that supports a wide range of wildlife and serves as a necessary buffer against the continuous expansion of urban areas. The importance of preserving such natural environments cannot be overstated, particularly in light of the ongoing climate crisis and the need for sustainable development practices.

We are deeply concerned about the potential impact of new housing developments in Capstone Valley, which could lead to significant loss of green space and a degradation of the local environment. The recent approval of planning applications for Gibraltar Farm and East Hill, both of which are part of Capstone Valley, highlights the urgency of this issue. These developments are on the fringe of existing urban areas and are accessed via narrow country lanes, making them particularly unsuitable for large-scale housing without substantial infrastructure improvements.

Infrastructure and Traffic Concerns

The proposed developments in Capstone Valley and the broader Princes Park area will inevitably lead to an increase in traffic, placing additional strain on already congested roads. This is particularly concerning for Gibraltar Farm, where the current infrastructure is inadequate to support such an increase in residential density. The narrow lanes surrounding the site are ill-equipped to handle the expected surge in traffic, raising safety concerns for both new and existing residents.

We urge the Council to carefully consider the infrastructure requirements that will accompany these developments. Without significant investment in road improvements, public transport, and other essential services, these areas will become increasingly difficult to navigate, leading to a decline in the quality of life for residents.

Balancing Housing Needs with Environmental Protection

We recognise the pressing need for new housing in Medway, particularly affordable homes for first-time buyers and families.

However, this need must be balanced with the imperative to protect our natural environment and ensure sustainable development. The Local Plan's vision for Medway must not come at the expense of current residents or the destruction of invaluable green spaces like Capstone Valley.

We believe that the Local Plan should prioritise brownfield development and urban regeneration over the release of greenfield sites. This approach would not only protect our natural environment but also contribute to the revitalization of Medway's urban centers, making them more attractive places to live and work.

Conclusion

In conclusion, while we support the need for new housing and the Council's broader goals for Medway's growth, we strongly advocate for the protection of Capstone Valley and the careful consideration of infrastructure needs in any future development plans within Princes Park or the wider area. The natural beauty and biodiversity of Capstone Valley is irreplaceable, and we must do everything in our power to ensure that this area remains a 'green lung' for Medway, both for the benefit of our current residents and for future generations.

We look forward to continued dialogue on this matter and hope that our concerns will be taken into account as the Local Plan is finalised.

Yours sincerely,

Cllr Alex Hyne
Cllr Robbie Lammas

Princes Park Ward
Medway Council

Sent from [Outlook for iOS](#)



Naushabah Khan MP
Member of Parliament for Gillingham and Rainham
House of Commons, London SW1A 0AA
Email: Naushabah.Khan.MP@parliament.uk

██████████
Chief Planning Officer
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

08 September 2024

Dear ██████████

I am writing to offer my input on the Regulation 18 consultation for the Medway Council Local Plan 2041. I must first commend Medway Council officers for their thoroughness and dedication shown throughout the process. The various ways in which the council has sought to involve the wider community are a testament to the commitment to a transparent and open process.

The Local Plan 2041 is a pivotal document, which will shape the future and trajectory of Medway for years to come. For this reason, it needs to strike a balance between the accommodation of growth and the preservation of the unique qualities that make Medway a great place to live and work. A place to call home should be a basic right, and access to good genuinely affordable housing that can be accessed by local people has to be outcome of any Local Plan. The need to grow sustainably must be a central principle underpinning the Local Plan and this goes further than simply the need for housing. The opportunity to enable business growth, the regeneration of our town centres, protect our environment and improve health and well-being is also crucial.

Against this context, Option 3 presents the most judicious and sustainable course for Medway's future. The 'brownfield first' approach prioritises the regeneration of our urban centres and waterfront locations, while integrating greenfield development within suburban and rural areas. In the allocation of approximately half of new developments to brownfield sites, the plan makes significant effort to safeguard Medway's valued greenspaces. I am pleased that this strategy will ensure that housing density and design will be guided by heritage and existing infrastructure and not be driven solely by targets.

The failure of the previous administration to produce a Local Plan has inevitably exposed Medway to 'piece meal' development, which has placed significant pressure on local infrastructure and services to the detriment of residents. This has particularly impacted Rainham and with this in mind I cannot support further development in this area. The existing infrastructure, notably along the A2, is already subject to significant strain, and the Lower Rainham Road cannot accommodate additional traffic; not only does create traffic congestion issues but also has a significant impact on air quality and pollution. Any further housing development in this area would only exacerbate current challenges.



Naushabah Khan MP

Member of Parliament for Gillingham and Rainham

House of Commons, London SW1A 0AA

Email: Naushabah.Khan.MP@parliament.uk

The failure to pass the previous Local Plan, also means that sites across Medway that would have not been considered as part of this process are now being reviewed. I have further reservations about development in the Capstone Valley; although am pleased to see that the preferred Option 3 does not propose development on the Capstone Park or Darland Banks; both sites of significant importance offering vital green space. The Capstone Valley overall is a vital green lung and ecology corridor, and understanding this must be central to the considerations of the Local Plan. It also does not have the necessary infrastructure to support significant housing development.

Unfortunately, despite opposition, approval of Maidstone Borough Council's Local Plan Review, adopted in March 2024, allocates 2000 homes at the Lidsing Garden Settlement, although this is currently being subject to a judicial review. I cannot support the Lidsing proposals, which will have a significant impact on Medway's infrastructure and have also created a precedent for house building in the Capstone Valley; the proposals also lead to the exposure of Gibraltar Farm and East Hill. If the judicial review does not favour Medway, it is imperative that Medway Council works with Maidstone Council to ensure there we mitigate against the impact on Medway, including schools, road, health services and open space.

Furthermore, I understand that a planning application for Gibraltar Farm has been approved by Medway Council's Planning Committee. I would urge the Council to consider the sale of the 'ransom strip' associated with the proposals at Gibraltar Farm, which will offer a sustainable traffic solution through North Dane Way, minimising impact in Hempstead.

In the spirit of collaboration, I hope that the comments detailed above are strongly considered. The lack of a Local Plan to date, has been detrimental for Medway and hindered progress and growth. I hope the Local Plan 2041, developed through a genuinely consultative process, can secure the best future for Medway and deliver for my constituents in Gillingham and Rainham.

Yours Sincerely,

Naushabah Khan

Member of Parliament for Gillingham and Rainham

Cuxton Parish Council Response to Medway Local Plan



Cuxton Parish Council would like to make the following points in response to the Regulation 18 consultation for the Medway Local Plan.

- Residential Development in SGO2 and SGO3
 - Cuxton Scarp Foot
 - Land off Sundridge Hill
- A228 (Sundridge Hill / Rochester Road)
- Greenbelt classification
- Policy S6 Kent Downs Area of AONB National Landscape

Residential Development in SGO2 and SGO3

Cuxton Scarp Foot

Residential Development has been suggested for an area known as Cuxton Scarp Foot, encompassing both Port Medway Marina and Cuxton Common Marsh, but without any estimates of the scale or size of planned developments, commenting becomes difficult, however we would like to raise the following concerns.

Access

The access to this potential development/s is of significant concern as only three possibilities come to mind:

1. Access via Medway Valley Park - the most acceptable option to CPC based on current road layouts.
2. Access via a new road down from Sundridge Hill (A228). This would create additional strain on the M2 junction, and further slow this section of the road. There is also the added concern of having to bridge the existing railway to create the new route.
3. Access via Station Road. This road is narrow and not fit for purpose, already serving the marina, train users and residents. Its junction with the A228 is notably precarious due to increasing traffic flows on the fast-moving A228. There is also the issue of the level-crossing to mitigate, which would otherwise create significant problems for queuing and emergency access.

Flood Plain

CPC have concerns about the flooding potential of this saltmarsh site and its susceptibility to high tides and rising sea levels. This has been identified and evidenced by Medway Council in its Flood Risk Strategy.

Wildlife / Character assessment

Medway's Blue Green Infrastructure Vision suggests that the area is 'at threat of landscape fragmentation with loss of rural character and local distinctiveness'. It also however, lists Cuxton Scarp foot as a Tier 3 Local Wildlife site and stresses that the openness of this area is important to achieving

the aims of the project, as 'a prominent green backdrop, wildlife corridor and green lung extending from the countryside into the urban area'

Whilst the MLP consultation mentions commissioning a *new* Medway Landscape Character Assessment, the existing document analyses the distinct character / importance of this area in detail and lists the following designations: 'ALLI; Strategic gap; safeguarded corridor for M2 widening; safeguarded route for CTRL; SNCI'. It also notes that the area is 'Prominent in views from many directions (including A228, M2, CTRL, Medway Valley Railway and the Medway River); has significant potential as an inviting 'gateway' into the urban areas of Medway and creating a tranquil and welcoming 'first look' of Medway for visitors arriving via the M2 '

The same assessment also states that the area's 'openness maintains separation between urban areas, M2 and CTRL and Cuxton Village; helps to retain local identity and enhance village setting' and 'Provides visual link and balance with Kent Downs AONB on adjacent side of river'.

Housing Types

According to reports, the housing at Port Medway Marina is being designed for the 'high-end' market, with boat moorings etc. CPC want to reiterate their request that a range of housing is included in the development plans, catering for different budgets, including starter homes and social housing.

Land off Sundridge Hill

There is inconsistent inclusion of this area on the maps available in both hard and soft copy. It is showing as a site for development on the Rural Development map, available to download from the website, but not on the available hard copy documents. CPC would like to understand if this inconsistency is an oversight, and whether or not this plot is included?

Additionally, it is hard to identify, from the size/ scale of the maps if this is the same land identified as either plot 1015 or plot 1068 ('The Homestead') in the SLAA of 2019, or Plot CHR13 of the SLAA 2023.

If this land *is* to be included for possible development, CPC would like to understand exactly which plot this is.

A228 (Sundridge Hill / Rochester Road)

CPC would like reiterate their long- standing concerns about the capacity/flow of the A228 and ask that for all developments, residential or otherwise, significant consideration is given to the impact on this road, both at the time of construction and in the longer term.

We also request that impacts are not considered individually / per development, but rather as part of the overall incremental creep that has occurred over the last 10 years.

This stretch of road is already at capacity, marred by seemingly constant temporary traffic lights and is at further threat of up to a 40% increase in traffic if the LTC project proceeds.

The Bush Road / A228 junction is increasing difficult and dangerous, and the vehicles queuing to get in and out of the village is having a detrimental effect on the air quality of the village.

Greenbelt classification

In the Greenbelt Sites Map, available to download, there is a distinction between Greenbelt (shown in Green) and Greenbelt Sites (shown in orange). CPC note that a section of greenbelt within Cuxton is designated as a 'greenbelt site'. Can you explain why this is please and provide further details?

Kent Downs Area of AONB National Landscape

In this section of your consultation document, CPC note the repeated usage of the phrase 'conserve and enhance' with some concern. Naturally, we would like to see careful conservation of these areas being a priority for Medway Council, but urge caution for the application of 'enhancement' where none is required, and concur that stringent tests for public interest are applied in these instances.

Cuxton is home to some of the most protected and significant landscapes in the UK, and certainly in Medway. We understand what a rare and vital resource this, and what a wonderful impact unspoilt countryside can have on the health and wellbeing of local people. As such, we appreciate the renewed interest in the maintenance / promotion of the registered footpaths in and around Cuxton. As a rural village however, we urge that the vision of eco-tourism for Medway is carefully applied.