

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Contact Form from OpusConsult  
**Date:** 30 June 2025 15:02:34

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You have recieved a message from the OpusConsult contact form

From: D.Ambrose

Email: [REDACTED]

Message:

In the draft plan its suggest that exsiting Gypsy sites will be kept.

If this is the case can you supply adequate facilities to the Gypsy site in Meresborough Road , as they have no water of their own.

**From:** [REDACTED]  
**To:** [policy\\_planning](#)  
**Subject:** Urgent Concerns: Reclassification of Strood Greenbelt to Greybelt  
**Date:** 30 June 2025 18:38:20  
**Attachments:** [IMG\\_1062.PNG](#)  
[IMG\\_1063.PNG](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Councillors,

Further to the recent approval of the draft Medway Local Plan on Thursday 26th June, I am writing to raise serious concerns regarding the deeply troubling decision to reclassify the Greenbelt land north of Rede Court Road and Brompton Farm Road as "Greybelt".

While I fully acknowledge the need for housing, Greenbelt land exists for a very specific purpose: to prevent urban sprawl, preserve the character of historic settlements, and protect our natural environment. It is therefore deeply concerning and, frankly, baffling that this land has now been reclassified to allow development – a move that appears completely inconsistent with both local evidence and national planning policy.

To provide an insight these concerns - your own commissioned Medway Green Belt Review ([https://www.medway.gov.uk/download/downloads/id/3479/medway\\_green\\_belt\\_review.pdf](https://www.medway.gov.uk/download/downloads/id/3479/medway_green_belt_review.pdf)) states the following about this particular parcel of land:

"This parcel... forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham... Land uses consist of a mixture of arable, horticulture and orchards... The arable farmland to the south west... is distinctly part of the wider Green Belt farmland extending towards the A289 and beyond."

The review clearly concludes that this parcel makes a "high contribution to the Purpose and Aims of the Green Belt". Given this, it is wholly unclear on what grounds the land has been reclassified as "Greybelt" – a designation typically applied to areas that are previously developed, heavily degraded, or not fulfilling Green Belt purposes.

This land does not meet that criteria. It is actively used for agricultural and recreational purposes, plays a clear role in maintaining the physical separation between Strood and Gravesham, and supports the openness and rural character that Greenbelt designation is meant to preserve.

Moreover, Medway and Gravesham have already experienced one of the highest levels of Greenbelt erosion across the region. Reducing it further, particularly in a location that your own report affirms is valuable, is not just unsustainable – it is unjustifiable.

To add to these concerns - during the debate last Thursday, numerous objections were raised by councillors including the impact on:

- Local traffic and congestion (already severe)
- School and GP capacity (already overstretched)
- Added pressure on the rail network (already very overcrowded)
- Water infrastructure and the strain on reservoirs (historically low this year)

These issues were not only raised during the debate but also explicitly outlined in your own Strood North and Frindsbury Spring Newsletter, where you committed to protecting the Greenbelt and opposing overdevelopment.

For many residents, that public promise built trust. This reclassification now appears to break that trust, undermining your credibility and weakening public faith in local democratic processes.

In addition - The National Planning Policy Framework (NPPF – December 2024) clearly states that any housing development proposed on land released from the Greenbelt must provide accessible, high-quality green spaces:

"New residents should be able to access good quality green spaces within a short walk of their home... whether through onsite provision or through access to offsite spaces."

However, initial versions of the draft Local Plan do not appear to meet this requirement. For instance, residents around Strodes Close would have extremely limited access to green space without crossing multiple roads – a clear departure from the “golden rules” established in the NPPF.

Given all of the above, I am urging you once again to review the reclassification of this Greenbelt land to Greybelt. The legitimacy of this decision is highly questionable, and the evidence base presented so far does not support the move.

The land in question plays a demonstrable role in the Greenbelt’s core purposes, and its development would have long-lasting, negative consequences for our infrastructure, environment, and community.

I am asking – as a resident, taxpayer, and as a voter, for full transparency, evidence, and justification from the Council on why this reclassification has occurred?

I urge you to consider a reversal of this deeply concerning decision and thank you for your continued attention and service.

I look forward to your response and, more importantly, your action.

Yours sincerely,

Helen Leydon

Strood North Resident

Planning Policy Team  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
ME4 4TR

Helen Leydon

[REDACTED]  
[REDACTED]  
[REDACTED]  
ME2 [REDACTED]

30/07/2025

**Subject: Formal objection to the removal of land North of Brompton Farm Road from the Green Belt**

Dear Planning Policy Team,

I am writing to express my strong objection to the proposed removal of land north of Brompton Farm Road in Strood from Green Belt designation, as indicated in the draft Medway Local Plan 2041. I also object to any reclassification of the area as "Grey Belt" or any attempt to earmark it for future development.

This land must remain protected due to environmental concerns, long-standing community opposition, and a clear failure to demonstrate the exceptional circumstances required to justify such a change. The rationale presented for this reallocation does not meet legal, policy, or practical thresholds and should be reconsidered in full.

### **Inadequate Infrastructure and Poor Site Sustainability**

The area around Brompton Farm Road is ill-equipped to accommodate additional development. Existing infrastructure is already under severe pressure:

- **Transport Congestion:** Local roads frequently experience gridlock, and public transport options are insufficient. Personally, a short commute to Strood station often exceeds 30 minutes by car, and trains are regularly overcrowded.
- **Overstretched Services:** NHS dental and GP services are oversubscribed - my household has had no choice but to rely on private dental care due to a complete lack of local availability.
- **Educational Gaps:** Local schools are at capacity, with little scope to absorb additional demand.

Any substantial housing scheme in this area would only exacerbate existing shortfalls, creating long-term negative consequences for residents.

### **Lack of Exceptional Circumstances and Policy Justification**



Under Paragraphs 144–147 of the NPPF, Green Belt boundaries should remain fixed unless there is compelling evidence of "exceptional circumstances." Medway Council has failed to demonstrate these, particularly in relation to:

- Availability of Alternatives: It remains unclear whether all reasonable alternatives have been explored or exhausted - especially regeneration opportunities within Medway City, where houses are boarded up or on alternative brownfield and unused land
- Recent Government Guidance: Central government has repeatedly affirmed that housing need does not, in itself, justify Green Belt release. The 2025 Government response to the Levelling-Up Bill confirmed: "Local Authorities are not required to alter Green Belt boundaries simply to meet housing targets."

### **Environmental Sensitivity and Loss of Landscape Character**

The proposed site contributes significantly to the area's rural character and biodiversity:

- The land is part of a continuous green corridor with hedgerows and woodland that support wildlife, including bats, birds of prey and badgers.
- It provides sweeping views across the Medway Valley, contributing to the local identity and sense of place.
- No ecological impact assessments have been published in support of the site's reclassification, undermining any evidence-based claim that the site is appropriate for development.

Its loss would damage the local environment in ways that are neither justified nor reversible.

### **Planning History Undermines Reallocation Justification**

This site has been the subject of multiple planning applications - notably for 122 and 135 dwellings - which were refused due to its Green Belt status, inadequate infrastructure, and environmental harm. The fact that these applications were rejected on sound planning grounds reinforces the need to preserve the land's protected status. No meaningful new evidence has emerged to override those previous conclusions and the new development plans are much larger than the previous submissions, which surely must be completely unviable.

### **Green Belt Functions Still Clearly Fulfilled**

Despite development pressure, this site continues to serve the Green Belt's core purposes, as identified in Paragraph 140 of the NPPF:

- It prevents the merging of Strood's urban edge with rural land.
- It helps contain urban sprawl and encourages brownfield regeneration.
- It provides a visual and physical buffer between town and countryside.
- The land is actively used as orchard/farmland, contributing to food production and the rural economy.

There has been no substantive change in circumstances that would justify disregarding these important functions.

### **Community and Political Resistance**

The local community has consistently and forcefully opposed development on this land:

- Petitions, formal objections, and representations have been lodged across multiple consultation periods.
- Local councillors and public forums have reiterated the importance of keeping this land protected, to include the Labour Council in the run up to previous local elections.
- The proposal has attracted negative media attention, signalling broad public disapproval.

Meaningful local engagement must influence planning outcomes, in accordance with both the NPPF and the Localism Act.

### **National Environmental Policy Conflict**

The reclassification also appears to contradict national environmental policy updates introduced in late 2023, including:

- Commitments to avoid development on ecologically valuable or visually sensitive land.
- Requirements under DEFRA's Local Nature Recovery Strategies (LNRS), which should guide not be sidelined by Local Plan decisions.

A "Grey Belt" designation here would not align with Government descriptions, which apply to previously developed land, not greenfield agricultural land.

### **Legal and Procedural Concerns**

Serious questions must also be raised about the transparency and procedural integrity of this designation:

- The policy proposal was not made public until the agenda for the 26 June 2025 Council meeting, limiting meaningful public scrutiny.
- References to a "joint masterplan" between Medway and Gravesham remain unsubstantiated and no such document has been shared to date.
- The independent review of Medway's 2025 Green Belt Study lacks transparency, with no published methodology, procurement details, or conflict of interest declarations.

These omissions severely weaken the Plan's legal and evidentiary standing.

Given all of the above, I urge Medway Council to:

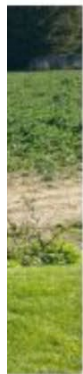
- Retain the land north of Brompton Farm Road within the Green Belt boundary.
- Remove any reference to “Grey Belt” or development allocation from the emerging Local Plan in relation to this site.

This land is environmentally sensitive, strategically significant, and lacks the infrastructure needed to support development. Its removal from the Green Belt is not justified under national policy, case law, or local precedent, and its protection must be upheld in the interests of sustainable planning and community well-being.

Yours sincerely,

Helen Leydon

## TO STROOD'S GREENBELT



Gravesham Council is considering consenting housing on its side of the Higham border, which would increase the size of Strood by a third. That is land north of the A2, opposite Strood Academy, including Chapter Farm, the grounds of Rochester FC and the land east of the village of Three Crutches around the back of Rede Court Road to the Gravesend Road.

The Medway Labour & Co-operative Group objects. Traffic levels alone are reason enough to make this development unsustainable, especially bearing in mind the other planned developments for Strood and the Hoo Peninsula. The local economy would suffer badly as Medway Council, schools and local amenities are already struggling to cope with providing services for the existing population.



## FORMER CIVIC CENTRE

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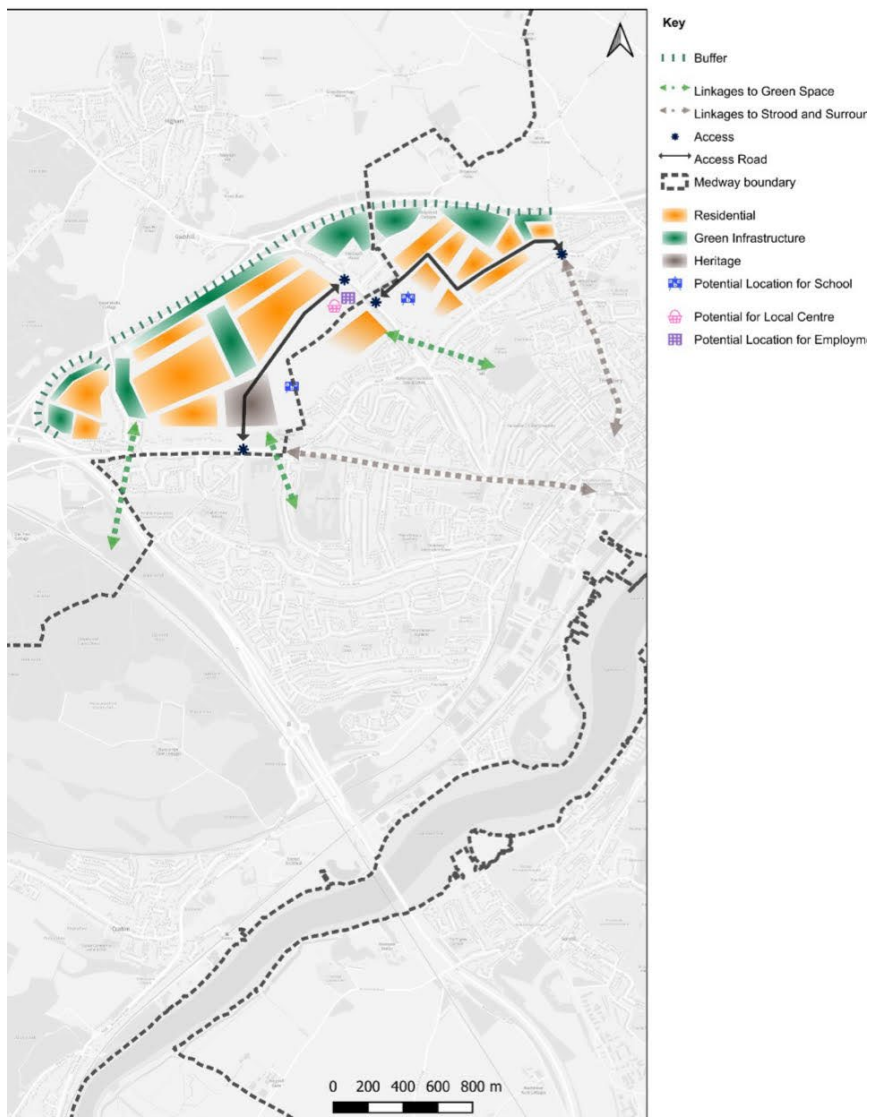
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WhatsApp



267

MEDWAY LOCAL PLAN 2041 (REGULATION 19, JUNE 2025)



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Medway Council 2025

## Figure 12: Land West of Strood Concept Plan

democracy.medway.gov.uk

11:35



# Strood North and Frindsbury Spring Newsletter

## FURTHER DELAY TO THE LOCAL PLAN EQUALS A GREATER THREAT

Chaos and division within Medway Council's Tory leadership means that the Local Plan, which is essential for the future of Medway, will now be delayed for at least another year.

As well as the banking proposals to build over 10,000 houses on the New Peninsula, the council is still being forced to look at similar numbers of new homes for the Capstone Valley and Lower Rainham. Threats to close Chatham Dock as one of our key employment sites and the failure to deliver basic documents on sustainability and local infrastructure needed for a Local Plan have led to the delay.

The Leader of the Council wants to close the Docks at the cost of over 800 jobs, simply to allow more housing development for Net Zero. This will mean the end to hundreds of years of history and a major blow to Medway's already fragile economy.



## WOMEN'S SAFETY

When meeting residents the issue that comes up most, along with protection of green spaces, is women telling us they were fearful when out at night. Alongside Labour's concerns following the killing of Sarah Everard we decided to invest a proportion of our limited ward funding to place alarms to give out to women & girls and to listen to their fears and thoughts about safety both in and outside of their homes.

We have spoken to around 350 women and girls across a wide age range, from teens to elderly women, sometimes on their own and others with supportive partners and male family members. Less than a third of those we have spoken to said they felt safe when they are out, particularly on their own and in the hours of darkness. Several chose not to go out alone at all.

Several younger women felt if they raise issues with the Police their concerns were not taken seriously. We met two young women separately who told us they were being stalked and even attacked by ex partners and felt their approaches to the Police were not properly addressed. Many felt there should be more police presence, particularly women officers and PCSOs.

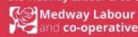
At a recent council meeting the Labour Group proposed a request to the Police Commissioner for additional officers in Medway - the ruling Conservative group unanimously voted the proposal down as unnecessary. The Labour Group will continue to press for measures to be implemented to keep women & girls, as well as other vulnerable people in our communities safe.

### CLLR STEPHEN HUBBARD

84 Jersey Road, Strood, Rochester ME2 3PD  
Home phone: 01887 214707  
Email: stephenhubbard3@virginmedia.com



For news, campaign updates & further contact details please visit the Medway Labour & Co-operative Group website at [www.medwaylabour.org.uk](http://www.medwaylabour.org.uk)



### CLLR ZOE VAN DYKE

67D 84 Jersey Road, Strood, Rochester ME2 3PD  
Home phone: 01774 406662  
Email: zoe.vandyke@medway.gov.uk



## STROOD LOCAL VOICE 2022 - Strood North and Frindsbury

### ZOE REPORTS

Since my election incidents have been in touch, seeking assistance with various council related and other matters. Three days after the election I spoke at a meeting of the Planning Committee on behalf of residents of Parsonage Lane regarding the impact on them of the Manor Farm development. I will continue to do all I can to support you. The Labour & Co-operative Group on the Council continues to work hard on behalf of the people of Medway and I am proud to have the opportunity to become part of this. Local health services are under great pressure, treating an increasing population. Getting a GP appointment can be difficult. We are supporting local health providers to provide incentives for more to GPs to come to Medway. We will campaign for more resources and will make sure patients' voices are heard.

The lack of on street parking remains a major issue. If you come home late at night you do not want to be driving around looking for a space and then walking a distance to your home, especially if you are a woman. Alongside the



local policing team, we have been holding Women's Safety Events, with a view to address such worrying concerns.

Members of the Labour group took part in a march, through the town, to shout for stronger action to meet the imminent challenges of climate change. This is a battle that must be won for the sake of our children and grandchildren.

### STROOD NORTH AND FRINDSBURY WARD NOW HAS TWO LABOUR & CO-OPERATIVE COUNCILLORS



Cllr Zoe Van Dyke says, "My thanks to everyone who voted for me at last year's by-election. I am committed to doing my very best for the residents of Strood North no matter whether you voted for me or not. Cllr Stephen Hubbard informs, "The next Medway wide council elections are in May 2023, with significant alterations to ward boundaries. Here there is minimal change. The ward name is changed to Strood North & Frindsbury and the town centre is fully located within the ward. Thus, the ward will be extended to include the site of former Civic Centre and the streets bounded by Priory Rd, Knights Rd & Clifton Rd."

### PROTECTING WOMEN STREET STALL

Zoe along with female Labour Party members & councillors ran a street stall on Strood High Street. The anti-violence against women stall was very successful, good call Zoe it's clearly an issue. We gave away 100 alarms and 67 people answered our questionnaire and were pleased that Labour was taking it seriously. Big issues were poor lighting, men calling out sexist remarks and badly schooled girls feeling undermined by boys in their school. We will collate the data and present it to the police and council. Further street stalls have been held in other parts of Medway, with more to follow.



Page 1



[medwaylabour.org.uk](http://medwaylabour.org.uk)





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When meeting residents the issue that comes up most, along with protection of green spaces, is women telling us they were heartless when out at night. Alongside Labour's concerns following the killing of Sarah Lawrence we decided to invite a proportion of our limited funding to park alarms to give out to women & girls and to listen to their fears and thoughts about safety both in and outside of their homes.

We have spoken to around 350 women and girls across a wide age range, from teens to elderly women, sometimes on their own and others with supportive partners and male family members. Less than a third of those we have spoken to said they feel safe when they are out, particularly on their own and in the hours of darkness. Several choose not to go out alone at all.

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**CLLR STEPHEN HUBBARD**  
16 Jersey Road, Strood, Rochester ME2 3PD  
Home phone: 07827 714787  
Email: stephen.hubbard@medwaylabour.org.uk



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**Medway Labour**  
and co-operative

**CLLR ZOE VAN DYKE**  
C/O 94 Jersey Road, Strood, Rochester ME2 3PD  
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Email: zoe.vandyke@medwaylabour.org.uk



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## MANOR FARM DEVELOPMENT, FRINDSBURY

The council has approved the planning hybrid application for a secondary school, housing estate and the conversion of a Grade I Listed Barn to a wedding venue & conference centre. Half the housing will be accessed from Personage Lane.

The access to the school and half the housing is from a new house junction on Frindsbury Hill, opposite the Sun Farm pub. We all know that at peak times traffic is queuing along Frindsbury Hill, often as far back as Personage Lane, sometimes even further. The entrance will only be accessible Strood bound, which means vehicles coming from Strood will have to do a 360-degree U-turn at the roundabout to get into the school. You can imagine cars just stopping on Frindsbury Hill and dropping off children.

Zoe Van Dyke says, "Concern has been expressed by residents about the undefined period for which Personage Lane will be allowed to be used as a temporary access to the wedding and conference venue. This is compounded by worries about the effects of dust from the quarry mill, which turns, unacceptable noise pollution and/or excessive vibration will have on the street. We are calling for more to be done to address the concerns of these residents."

Stephen Hubbard adds, "We support the need for a new school. Within 2 years there would have been a serious



shortfall of Secondary School places on this side of Medway. We still believe Manor Farm was never a suitable location for the new school. We would have preferred a town centre site on Strood Waterfront, which would be much more accessible by public transport, reducing traffic congestion and helping the environment at the same time."

## STROOD WATERFRONT

The council has effectively walked away from its unfinished Strood Waterfront regeneration development. And there is a promise of no more progress on the horizon. Visitors arriving by train are given a bird's eye view of the two shabby



abandoned sites, the former Civic Centre site and Canal Road, Strood Riverside, either side of the railway line at Rochester Bridge.

Strood Riverside is a derelict dust bowl and health hazard. It is obvious that the Council should weed the area with grass to ensure that the dust is stabilised and routed rather than being constantly blown into homes of neighbouring residents.

The Road to Nowhere, the Council's expensive new Station Approach, is still not going anywhere. The Council needs to urgently agree a programme of works, with Network Rail, to link the road to Strood Station's forecourt.

When Canal Rd was raised and realigned the new river wall exposed a section of Strood Community Hall, from the pier to the pub. The wall is a rusting eyesore and a magnet for graffiti. We are working with Council's regeneration team to reinstate the missing section of the wall, along with works that will generally improve the look and feel of the area, including the reinstatement of the WW2 dragon teeth.



## HOUSING AND THE THREAT TO STROOD'S GREENBELT



The amount of future housing in our area is based upon Conservative Government figures which Conservative Medway Council is not challenging. There have been planning applications for the land north of Redle Court Road & Brompton Farm Road, up to the nearby Higham boundary with Gravesham Council. For now, Medway Council has been successful in defending this green lung. Following the Government's weakening of Greenbelt policies against development, expect further planning applications.

Gravesham Council is considering consenting housing on its side of the Higham border, which would increase the size of Strood by a third. That is land north of the A2, opposite Strood Academy, including Chapter Farm, the grounds of Rochester FC and the land east of the village of Three Crutches around the back of Redle Court Road to the Greenwood Road.

The Medway Labour & Co-operative Group objects. Traffic levels alone are enough to make this development unsustainable, especially bearing in mind the other planned developments for Strood and the 160 Peninsula. The local economy would suffer badly as Medway Council, schools and local amenities are already struggling to cope with providing services for the existing population.



## STROOD ESPLANADE, SITE OF FORMER CIVIC CENTRE

We are successfully pressuring the Council into making improvements to the Strood Esplanade, but more work still needs to be done to overcome the Council's dereliction of duty towards the site.

The Esplanade has been a focal point of Strood for more than a century, but following its reopening during the summer, the Council has come under fire for its mismanagement of the site, which had been the former dylite photography spot turn into an ugly embarrassment. Zoe Van Dyke says, "We were initially glad when we found out that site would be reopening. We were shocked when visiting the site to find that while the new walk may have been opened, there had been a total lack of attention to detail to make the area presentable. This site goes to show a lack of civic pride on behalf of the Council by failing to adequately maintain the presentation of a key location in our community."



Stephen Hubbard adds, "Upon the reopening, the hideous development hearings were unfortunately still in place by the former Civic Centre site, creating a barrier between the road and the green space. The grassed area and pathway had clearly not been cleaned and the grass had not been mowed. The litter bin that had been on the site was missing, not reinstated. The bench nearby hidden from view by hoardings was surrounded by litter, some of which was associated with drug taking. We asked the council's contractor Medway Horse to rectify these issues, only to discover they were acting on orders of the Council in not solving this problem. Such low standards for the green spaces in our area are a sad reflection on the mismanagement of our current Conservative Council. "We asked the Council's regeneration team to arrange the removal of the hoardings both by the Esplanade's grassed space and along the length of the Esplanade pavement. This has now been achieved."



SHARE



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan 2041 Comments  
**Date:** 02 July 2025 09:16:02

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Hi,

I visited the consultation event at St Nicholas Church in Strood yesterday and was able to ask questions to officials and a councillor.

I understand that the housing targets have been imposed by central government and, therefore, even in this densely populated, heavily congested part of the UK, the houses will have to be planned for and built, including on farmland and some green belt land.

I would, however, like to comment on a few specific points:

I tried to use the portal to make my comments, but it seems hard to do this for each part of the plan without Objecting or Approving the part which you wish to comment on. I think that this may put people off sharing their views - can a Comments Only box be added at the start of the portal?

Whilst sustainable transport and the provision of local facilities are mentioned throughout the plan, in the absence of a fully integrated public transport network across Medway, the reality will be a massive increase in car and commercial vehicle journeys. The proposals for the Frindsbury Peninsular and the Hoo Peninsular will cause considerable increases in traffic and will require a major road improvement scheme before the new houses and industrial sites at Kingsnorth are completed. This will need to include a flyover junction instead of a roundabout at the bottom of Four Elms Hill and traffic lights to enable traffic from Upnor/ Wainscott etc to join access the A289 at Four Elms Hill and Wulfere Way, for example.

The piecemeal proposed development in areas such as the Frindsbury Peninsular and West Strood may prevent properly planned infrastructure, including major roads and junctions, being built to cope with the needs of the fully completed individual developments. It would be expensive to compulsorily purchase the Frindsbury Peninsular and relocate the businesses to Kingsnorth but enable better plans for infrastructure to be implemented.

The officials were not able to advise me whether the current application MC/25/0006 and not shown as land for development on the draft Plan, would likely, therefore, be rejected. This proposed development on high quality farmland and with a totally unsuitable local road network and my support for the new Plan will be stronger if such unsuitable



developments are rejected prior to its implementation. This seems to be a clear attempt to 'get in first'.

I am generally in support of the local plan but against the government imposition of such a high level of house building in an already densely populated, congested and polluted area. Considerable Central Government road building funding will be needed to be secured and delivered in advance of most of the proposed developments.

Nick Hance

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ME3 [REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objecting to the local plan  
**Date:** 03 July 2025 11:48:48

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## CHANGE OF USE OF CHATHAM DOCKYARD LAND OWNER BY PEEL PORTS, FROM INDUSTRIAL LAND TO HOUSING.

Dear Sir/Madam,

I would be grateful to you would register my objection against the Local Plan for the Government Planning Inspectorate. Please be good enough to inform me when this has been done.

In 1978 the former Naval Base and Dockyard was closed and sold. Not only did the people of Medway lose this valuable asset, but also, thousands of skilled workers in well paid jobs, as well as apprenticeships for young people - with many learning in trades that you don't see anymore, and basically, the high income which Medway Council received from these sources.

The vast majority of the land surrounding the former Dockyard has already gone for housing, light office work, retail, and food outlets. So all in all, Medway has made more than it's fair share of sacrifices work wise that is, because full time well paid jobs the Dockyard offered has been replaced with low skilled and low paid part time work, such as offices and restaurants.

If the planning application for the change of use was accepted, it will mean once again that many hundreds of skilled well paid jobs will disappear for mainly office workers, and cleaning jobs as once the construction of all the housing and flats are completed - that's about all that will be left.

It therefore surprises me that local Councillors have voted to use what remains of the former Dockyard in its usage from industrial to housing. It's not as if there has not been any housing or flats built as everywhere you look around the area concerned, are plenty of high rise flats and supermarkets with more being proposed. It therefore seems to me, that the Councillors have once again got their priorities wrong as it's certainly not the people they are supposed to represent.

I would not be wrong to ask, just who is it that will be able to afford these flats? Certainly not the workers who will be losing their jobs that's for sure. Of course, Peel Ports will use the euphemism ' SOME AFFORDABLE ' flats are available which are normally the ones the developer cannot sell such as those on ground floor next to the bin cupboard.

Sometimes in life, profit should not be able to ride rough shod over local people and their needs, and quite frankly, believe there must be some ulterior motive for local councils to change the usage of the land as they are certainly not doing it for the local people they represent, so it has to be another reason.

Yes, people do need housing, particularly when you consider how many foreign nationals are pouring into our country unabated. But sometimes in life you have to look at the needs and desires of local people. This is one of them.

Yours sincerely,

MR SIDNEY ANNING

[REDACTED]

ME1

[REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection to the proposed local plan  
**Date:** 07 July 2025 09:25:47

---

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Sent from my iPhone Subject: Objection to the Proposed Local Plan Reclassification of Strood Greenbelt (Policy S7 & SA6)

Dear Planning Inspectorate,

I am writing to formally object to the proposed changes to the Medway Local Plan 2041, specifically relating to:

Policy S7: Greenbelt (Section 4.12)

Policy SA6: Land West of Strood (Section 4.10)

Core Reasons for Objection:

Lack of Transparent Public Notification:

The Greenbelt policy change—impacting Strood—was not made publicly available until the Council's agenda papers were released on 26 June 2025. This is a substantial policy shift not highlighted in prior Regulation 18 consultations, and thus undermines due democratic process and public participation.

Premature and Uncoordinated Policy Change:

Medway Council pushed forward with its plan before Gravesham Borough Council had finalized its own Local Plan and Greenbelt policies. Given the cross-border implications and collaborative planning references in section 14.10.5, this premature decision lacks regional coordination and credibility.

Lack of Supporting Evidence for Redesignation:

The Greenbelt Review used to justify the Greybelt designation appears hastily compiled and biased toward development, as only parcels 1–4, including West Strood, were named for housing. This raises concerns of predetermination and planning manipulation.

Flawed Criteria for Greybelt Justification:

The main argument used for reclassification—that parcels 1–4 do not lead to the merger of Strood and Gravesend—is overly simplistic. It ignores critical factors such as:

A 30% increase in Strood's urban footprint, overwhelming infrastructure and green space.

The absence of any robust consideration of environmental, social, and economic impacts in real terms.

Inconsistency with National Policy (NPPF):

The plan's interpretation of Greybelt goes far beyond the Government's current definitions. National guidance refers to small, unattractive brownfield sites, not significant portions of protected Greenbelt that serve as strategic green buffers.

Missing and Opaque Evidence:

Section 14.10.5 refers to a joint “high-level masterplan” with Gravesham, yet this document is missing from the evidence base. Without access to such foundational planning material, public and inspectorate evaluation is compromised.

Contradictions With Prior Council Positions & Community Intentions:

In past applications (e.g., Brompton Farm Road), Medway Council clearly stated the importance of the Greenbelt in preventing urban sprawl. To now reverse this without clear and updated justification undermines local trust.

Conclusion:

I respectfully urge the Planning Inspectorate to reject:

The reclassification of Strood's Greenbelt parcels (1–4) as Greybelt.

The current formulation of Policies S7 and SA6 due to the lack of transparency, questionable methodology, and premature assumptions that have not been fairly tested.

The Local Plan must be paused, revised, and resubmitted only after:

Proper consultation with affected communities

Updated, transparent masterplans and studies

Coherence with neighbouring councils' approved plans

Clear compliance with national Greenbelt policies

Yours sincerely,

Jennifer price

Me2

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Subject: Objection to the Proposed Local Plan Reclassification of Strood Greenbelt (Policy S7 & SA6)  
**Date:** 07 July 2025 10:30:43

---

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Dear Planning Inspectorate,

I am writing to formally object to the proposed changes to the Medway Local Plan 2041, specifically relating to:

Policy S7: Greenbelt (Section 4.12)

Policy SA6: Land West of Strood (Section 4.10)

**Core Reasons for Objection:**

**Lack of Transparent Public Notification:**

The Greenbelt policy change—impacting Strood—was not made publicly available until the Council's agenda papers were released on 26 June 2025. This is a substantial policy shift not highlighted in prior Regulation 18 consultations, and thus undermines due democratic process and public participation.

**Premature and Uncoordinated Policy Change:**

Medway Council pushed forward with its plan before Gravesham Borough Council had finalised its own Local Plan and Greenbelt policies. Given the cross-border implications and collaborative planning references in section 14.10.5, this premature decision lacks regional coordination and credibility.

**Lack of Supporting Evidence for Re-designation:**

The Greenbelt Review used to justify the Grey belt designation appears hastily compiled and biased toward development, as only parcels 1–4, including West Strood, were named for housing. This raises concerns of predetermination and planning manipulation.

**Flawed Criteria for Grey belt Justification:**

The main argument used for reclassification—that parcels 1–4 do not lead to the merger of Strood and Gravesend—is overly simplistic. It ignores critical factors such as:

A 30% increase in Strood's urban footprint, overwhelming infrastructure and green space.

The absence of any robust consideration of environmental, social, and economic impacts in real terms.

**Inconsistency with National Policy (NPPF):**

The plan's interpretation of Grey belt goes far beyond the Government's current definitions. National guidance refers to small, unattractive brownfield sites, not significant portions of protected Greenbelt that serve as strategic green buffers.

**Missing and Opaque Evidence:**

Section 14.10.5 refers to a joint "high-level master-plan" with Gravesham, yet this document is missing from the evidence base. Without access to such foundational planning material, public and inspectorate evaluation is compromised.

**Contradictions With Prior Council Positions & Community Intentions:**

In past applications (e.g., Brompton Farm Road), Medway Council clearly stated the importance of the Greenbelt in preventing urban sprawl. To now reverse this without clear and updated justification undermines local trust.

Conclusion:  
I respectfully urge the Planning Inspectorate to reject:

The reclassification of Strood's Green belt parcels (1–4) as Grey belt.

The current formulation of Policies S7 and SA6 due to the lack of transparency, questionable methodology, and premature assumptions that have not been fairly tested.

1. The Local Plan must be paused, revised, and resubmitted only after:
2. Proper consultation with affected communities
3. Updated, transparent master-plans and studies
4. Coherence with neighbouring councils' approved plans
5. Clear compliance with national Greenbelt policies

Additionally I know the local water board authorities have had difficulties recently supplying water services to various new housing developments across our region, what plans do they now have when expected to deal with an additional c18,000+ dwellings? -  
--

Yours sincerely,  
Mr Keith Bell

[Redacted signature]

ME2 [Redacted]

Tel: [Redacted]

**From:**



**Subject:**

Re: Objection to proposed Medway housing planning - SNF1

**Date:**

20 July 2025 12:04:08

[policy, planning](#); [representations, planning](#)

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Good morning,

I am writing to you to state my Objection to the proposed plans by Medway Council to build on current greenbelt land adjacent to the top of Carisbrooke Road, referred to in your recent planning documents as 'plot' SNF1.

I am well aware of the need for extra housing across the Medway area but I would have thought building on brown field or ex-MOD land would have been more of a priority rather than using existing productive 'Greenbelt' arable farming land, that has been in the same farming family for over the last 50 years.

I have seen the previously drawn up plans from 2023, which takes into account the various pipelines that run through this area for, Water, gas & the aviation gas pipeline, but have concerns as living adjacent to this field with the active aviation gas pipeline also running through our back garden that a breach of this pipeline could occur during construction, which could have devastating 'explosive' effects !!

Besides the above personal concern, I also wish to cite the following procedural concerns/ issues, for which I will be requesting formal responses to each point:

1. Across Kent the water board supply companies appear recently to have been having lots of supply problems, what responses have Medway Council had from local Water board authorities regards their ability to provide water & sewerage facilities pertaining to these planned developments. Especially any planned over the next 12 - 24 months?
2. Having reviewed the definitions of changes from Greenbelt to Grey belt land, how have Medway Council applied this process in this case, as this arable farming land does not appear to fit any of the Grey belt descriptions, within this definition, i.e - scrub land. ugly land, former developed land etc ?
3. Regards this 'Grey belt' change, where was the public announcement/ consultation process for the Medway local plan discussed at Council meeting 26th June & whilst this review was carried out by apparently independent consultants, who hopefully had no links to development companies - why was this report not available for review & who was the consultant company involved?
4. Also regards the 'link' with Gravesham BC , their local plan has yet to be published & hence surely the Medway Council 'Grey belt' plans should not have been agreed until theirs had been agreed, hence premature agreements by Medway not based on 'Fact' from Gravesham side - Why?
5. Overall with this relatively massive increase to the local population, where is the increase to local facilities such as, GP/ Dentist & especially extra capacity for Medway Hospital ?
6. A development master plan was developed between land owners & larger house building concerns, who naturally would be pushing for Greenbelt development as cheaper for them than having to build on any pre-existing old industrial ' brown field ' sites - why has sight of this 'document/ report' not been provided?
7. Finally I believe a recent developers only meeting was held by Medway Council with no public attendance allowed & this along with all above activities have taken place before any public consultation meetings have been arranged, giving local residents a feeling that this is already a done deal - hence what if any assurances will the council provide to listen & act upon any future concerns/ objections raised within future planned public meetings?

Kind regards - Keith Bell



ME2

**From:** [REDACTED]  
**To:** [representations, planning](#)  
**Cc:** [policy, planning](#)  
**Subject:** Objection to reclassification Green Belt local plan Strood  
**Date:** 08 July 2025 13:37:11

---

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I wish to object to the plan of regrading Strood Green Belt protected land to prevent Urban sprawl to reclassifying it to Grey Belt. On what grounds and legal standing was this based on apart from the council satisfying themselves behind closed doors, pre conceived agreement with councillors, sneakily hiding it from residents purely to satisfy Rayner and Starmer's ridiculous housing targets. In 2018 Medway and Gravesham both objected to building on this beautiful farmland stating it was high agricultural farmland and part of the Green Belt to prevent urban Sprawl. The same land is still farmed as has been with the same farming family for over 50 years. What right do you now have to say it is ugly wasteland, old car park or petrol station and deemed of very little use as per definition of 'Grey Belt' .

Have any of the councillors actually seen the farmland, the abundance of nature including Skylarks, Nightingales, Bats , Kestrels, Hobby's just to name a few that are seen and heard daily. Do any of the councillors who all but one who was bared from voting actually care that this land is part of our heritage, beautiful, a part of metropolitan land actually care that our children, Grandchildren will never know what beautiful farmland looks like. I bet the councillors were ordered to agree on a tick box , easy targets and Christmas bonuses all round. Also goes without saying lining the pockets of Greedy developers and easy land to build on. . Why is Brown belt land not being considered. The old Civic centre area is a disgrace to Medway having stood derelict for years when previously abolished for housing.

I'm aware that there is a need for more houses in Medway, especially to house T Murray's 700 homeless children she keeps harping on about in her generic and poorly written reply to residents. I do give her credit for actually replying since Mr Maple was clearly incapable of .

Have you considered the effect the number of houses considered will have on the infrastructure. Great build another surgery or school but consider the noise, traffic, pollution, gridlocked roads . The bypass and A2 are ridiculous in rush hour . You only have to look at Rainham where so many houses have been built to see the damage and gridlocks this has caused.

It's impossible to even get an appointment with a doctor in this area , where do you propose all the residents will go and have you even considered the implications on Medway hospital.

On a personal note our youngest daughter was unable to get a doctors appointment despite finding a lump. The surgery's advice as always call 111. I had to fight for her to get seen at Medway as Maidstone and Darent hospital too busy. Then we had to contact our MP as Medway unable to deal with the high number of Biopsies referred to Maidstone hospital. This resulted in lengthy delays of weeks and weeks to be told she has aggressive breast cancer which has spread to lymph nodes. Now we sit in gridlocked traffic, wait an hour to access the hospital car park in search of a car space adding to our stress and anxiety while she undergoes intensive chemotherapy. Has the implications of this even crossed the mind of a single counsellor who voted in favour of a huge housing estate. Probably not.

Water supplies are another issue since Southern water frequently have pressure problems in the area.

The fuel pipeline runs through our garden, we are not allowed to plant a tree or put up a fence without permission yet it seems developers can build 4000 homes. Have you considered the danger of one incompetent builder damaging the pipe and the catastrophe it could cause.

Flooding is another issue. Our house and land is about 6 foot lower than the field, frequently our garden floods but I bet there will be no consideration of this whatsoever.

Please consider the effect not only destroying this land, merging as one with Gravesham, the noise , pollution, dust , yet another ugly housing development will have not only on the residents but also the wildlife. I bet no thought has been given to that either.

There are far more suitable and available areas to build on in your plans and I suggest you look at these rather than an easy target like strood. Your actions are deplorable especially as I now see you have already arranged a meeting to discuss with developers. Like I said a pre conceived target driven by labour government and councillors that are clearly incompetent and nodding dogs .

Incase you are not clear by my comments, I am objecting, the plan is not legally compliant, it is not sound and you've shown no initial cooperation with the public having rushed head first and no consultation with the public.

Mrs Susan Bell



Sent from my iPhone

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Proposed development  
**Date:** 09 July 2025 21:01:56

---

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To whom it may concern,

I'm writing to express my disappointment over the plans for development in Strood.

My husband and I live in Cobb Close. We are in our late seventies and have been looking forward to slowing down in the autumn of our lives. As with our neighbours, our garden is very tiny, but this is made less of an issue, due to the farmland we back on to, which creates the feeling of space and clean air.

If the development goes ahead, we feel it will involve years of building work nearby, thus creating disruption and eyesores during our twilight years.

Like many other residents we are very concerned about the lack of infrastructure and increased traffic. As someone with breathing problems, the resulting air pollution worries me. I understand that Green Belt areas are so labelled in order to prevent urban sprawl and keep natural boundaries between towns. I fail to see how there will be definition between Strood and Gravesend, in certain areas, if this goes ahead. It seems senseless that a Green Belt designation can so easily be changed to a Grey one. I have visions of sitting in our tiny garden in our old age, feeling claustrophobic, and coughing persistently, from breathing in less clean air than we do now. Perhaps we'll have to stay indoors! As we age, we are less mobile, so cannot so easily access green spaces which are not nearby, so we will be more dependent on our gardens to get fresh air.

I have several health issues and have recently had to wait 3 weeks just to get a telephone appointment with the clinical pharmacist at my surgery. Some of my health concerns will never be addressed, as these days we have to prioritise, due to a lack of appointments. How much worse will things get with so many more houses? Added to this, our local surgery at Higham is being seriously threatened with closure.

I've seen the plans, and note that some land is designated as Heritage, but no one seems able to tell me what this means for the proposed development.

I'd like to add that, we do see kestrels, kites, foxes, pheasants and occasionally herons on the farm, so the loss of land would affect these birds and animals too.

I do appreciate that building targets must be met, but I, like many others, are not convinced that brown fields have been given due consideration. If we could build on less attractive land than the farmland proposed, then Strood will continue to be a decent place to live, rather than a concrete jungle.

Let's keep Strood as attractive as we can!

Regards

Angela Connelly

Sent from [Outlook for iOS](#)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway local plan  
**Date:** 11 July 2025 18:29:09

---

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Hi

I would like to strongly oppose the Medway local plan. Our healthcare is struggling with the number of people. Medway maritime hospital cannot cope with the demand it currently has. Adding up to a further 50,000 people to the struggling hospital will be too much. No hospitals are on the plan to cope with this demand. Our water / electricity etc also are overwhelmed as they are. The plan is not got an infrastructure that will cope long term.

I live in Hempstead, we already have air pollution, adding the number of houses which will adjoin the Lidsing development will join walderslade, lordswood, Hempstead, Chatham, Gillingham and Rainham to one massive town. There is no green areas ... you are destroying the area! The air quality is already poor !!! The roads in our area can't cope and are in a terrible condition the proposed infrastructures isn't good enough to cope. Please we beg you don't build the houses in capstone valley or at least limit them with correct infrastructure and large green spaces.

Regards  
Sue Self

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Subject: Regulation 19 Representation – Policy T9 (Self-Build and Custom Housebuilding)  
**Date:** 12 July 2025 15:34:44

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Dear Planning Policy Team,

I am writing in response to the Medway Local Plan Regulation 19 consultation, specifically to make representations on **Policy T9 – Self-build and Custom Housebuilding**.

I support the Council's recognition of the demand for self-build and custom housebuilding in Medway, and the inclusion of a dedicated policy (T9) to facilitate delivery. However, I would respectfully request that the policy wording be made **more flexible and responsive to smaller-scale, windfall self-build proposals**, particularly in rural edge locations where demand is strongest.

The Council's Self-Build Register demonstrates consistent interest in plots across Medway, with the **Peninsula and Rainham** noted as areas of highest preference. Yet, Policy T9 currently focuses its delivery mechanisms on large-scale sites (100+ units) and a single site allocation (Fenn Farm, Hoo), leaving a gap in provision for **modest, non-strategic self-build sites** that could directly meet local demand in these preferred areas.

In support of this, I would urge the Council to:

1. **Amend Policy T9 to explicitly support small-scale windfall proposals (1–3 units)** where sites are well-located, sustainably accessible, and can demonstrate a clear link to the Register's locational preferences.
2. **Acknowledge the role of Permission in Principle (PiP)** as a proportionate route for enabling such self-build schemes, especially in rural edge settings not designated or protected for their environmental value. This aligns with national policy encouraging diverse routes to housing delivery and local empowerment.
3. **Ensure the supporting text and monitoring framework allow for the delivery of small-scale PiP-led self-build plots** to count towards meeting identified demand under the Housing and Planning Act 2016 and associated Self-Build legislation.

Without these adjustments, there is a risk that Policy T9 underdelivers on its purpose, fails to meet the diversity of self-build demand in practice, and limits opportunities for sustainable, locally-led housing delivery.

Thank you for considering this representation. I would welcome the opportunity to elaborate further during the Local Plan examination process and will be submitting a Permission in Principle application shortly that aligns with the objectives of Policy T9.

Yours faithfully,  
Peter Lowe

## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Peter"/>	<input type="text"/>
Last Name	<input type="text" value="Lowe"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="ME3"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>



---

## Part B – Please use a separate sheet for each representation.

---

Name or Organisation: MR PETER LOWE

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Site Reference:	Policies Map
		SR22 – Land at Merryboys Road, Cliffe Woods Policy: General site allocation and Policy T9 (Self-Build and Custom Housebuilding)	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

## Appendix A – Legal Compliance and Soundness Justification

This appendix provides further detail in response to the question:

"Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate."

Response:

I consider the Medway Local Plan 2041 to be **\*\*unsound\*\***, on the basis that its rejection of Site SR22 (Merryboys Road, Cliffe Woods) fails the tests of:

- **\*\*Justification\*\*** – the exclusion is based on outdated or overstated evidence (e.g. transport accessibility and land use classification),
- **\*\*Effectiveness\*\*** – the Plan does not make adequate provision for small-scale, self-build opportunities in rural edge locations despite identified demand, and
- **\*\*Consistency with National Policy\*\*** – the Plan fails to reflect Paragraphs 71, 85, and 183(c) of the NPPF 2024, which require planning authorities to support rural housing, optimise underutilised land, and assess agricultural land in its current condition.

In addition:

- The site offers a logical opportunity for low-impact self-build housing, in line with Policy T9, but this is not reflected in the spatial strategy or site allocation decisions.
- The site is no longer isolated in transport terms, following improvements confirmed by Cliffe and Cliffe Woods Parish Council in 2025.
- The Plan does not account for strong expressions of interest from prospective local residents seeking to return to the area to be close to family—evidence of real self-build demand that is being overlooked.

**\*\*Legal Compliance and Duty to Co-Operate:\*\***

This representation does **\*\*not allege a failure of legal compliance\*\*** or breach of the duty to co-operate. However, if the continued exclusion of well-evidenced and locally supported small sites persists, it may raise broader concerns about whether the Plan has been positively prepared and justified across all rural areas.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

## **Appendix B – Proposed Modifications to the Local Plan for Legal Compliance and Soundness**

To address the unsoundness identified in relation to Site SR22 (see Appendix A), the following specific modifications are requested:

### **1. Reconsideration and Allocation of SR22:**

Proposed Modification:

Include Site SR22 (Land at Merryboys Road, Cliffe Woods) in the Local Plan as a small site allocation for limited self-build or custom housebuilding, in line with Policy T9.

Justification:

This modification ensures the Plan is:

- Justified – by basing site exclusion/inclusion on up-to-date local evidence including transport changes, land use conditions, and self-build demand.
- Effective – by enabling a deliverable site that meets a specific housing need;
- Consistent with National Policy – particularly NPPF 2024 paragraphs 71 (self-build), 85 (rural vitality), and 183(c) (land classification in context).

### **2. Clarification of Policy T9 (Self-Build):**

Proposed Modification:

Amend the supporting text of Policy T9 to confirm that:

- Permission in Principle applications will be considered favourably on underutilised rural edge land, subject to appropriate design and landscape safeguards.
- Non-allocated sites (such as SR22) can qualify as windfall sites where they support locally identified self-build demand and do not compromise strategic planning objectives

Suggested Additional Text for T9 Supporting Paragraph:

“Medway Council will support small-scale self-build and custom housebuilding proposals outside settlement boundaries, including through Permission in Principle, where they respond to local need, are well-designed, and make use of underutilised or degraded land at the rural edge. This approach reflects national policy support for community-led, context-sensitive housing in rural areas.”

Justification:

This ensures the Plan remains flexible and aligned with real-world demand, avoiding reliance solely on strategic allocations to meet self-build targets.

## **Appendix C – Formal Representation regarding the exclusion of Site SR22 – Land at Merryboys Road, Cliffe Woods**

To: Planning Policy Team, Medway Council Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) Date: 01 August 2025 from Peter Lowe  
Re: Representation on Medway Local Plan 2041 Regulation 19 – Site Reference SR22

Dear Planning Policy Team,

I write to formally represent on the emerging Medway Local Plan 2041, specifically regarding the exclusion of Site SR22 – Land at Merryboys Road, Cliffe Woods.

### **Executive Summary**

This representation is made on the basis that the Local Plan 2041 is not legally compliant and is unsound in relation to its treatment of Site SR22 (Merryboys Road, Cliffe Woods). The exclusion of SR22 fails to reflect up-to-date evidence on transport accessibility, land quality, and settlement form, and does not support the delivery of identified self-build housing need, contrary to national and local planning duties. It therefore fails the tests of justification, positively prepared strategy, and effectiveness under paragraph 141 of the NPPF.

Public transport services have improved significantly since the site was assessed; the land is unused and of marginal agricultural value; and the limited scale of proposed self-build housing poses no risk of coalescence. Expressions of interest from individuals with local ties support genuine demand, aligning with Policy T9 and the Council's self-build duty under the Housing and Planning Act 2016.

A Permission in Principle application is currently under consideration for the north-east part of the land. The previous appeal refusal related to a significantly larger and different proposal and should not prejudice a small-scale, policy-aligned scheme.

Accordingly, I request that Site SR22 be reconsidered for allocation or as a windfall site under Policy T9. A modification to this effect is necessary to ensure the Plan is legally compliant, positively prepared, and sound.

### **1. Transport Accessibility Has Improved**

Contrary to the assessment, SR22 is now within reasonable walking distance of public transport. Since April 2025, new services—including a weekday minibus to Strood via Merryboys Road and extended Route 133 services—have enhanced connectivity. These changes reduce reliance on private vehicles and support sustainable rural growth, in line with NPPF 2024 paragraph 85.

## **2. Agricultural Land is Marginal and Unused**

While SR22 is classed as Grade 3, the land has been fallow and unmanaged for decades, with no active farming or infrastructure. Its current low-grade condition diminishes the weight of BMV concerns, consistent with NPPF 2024 paragraph 183(c), which calls for assessments reflecting actual use, not just technical grading.

## **3. No Significant Risk of Settlement Coalescence**

The site adjoins Cliffe Woods, not Cliffe village, with a substantial green buffer maintaining separation. Limited, well-designed self-build housing with appropriate landscaping would reinforce, rather than erode, settlement identity, consistent with NPPF paragraphs 82(d) and 85.

## **4. Suitable for Self-Build Housing**

SR22 offers a unique opportunity to meet identified self-build demand, supported by the Medway Self-Build Register and local interest. The underutilised site is ideal for small-scale, high-quality development respecting local character and rural context, as advocated in Policy T9 and NPPF paragraphs 125–129.

## **5. Local Support from Returning Family Members**

Two expressions of support relate to the current Permission in Principle (PiP) application Ref MC/25/1361 on the north-east portion of SR22 from individuals with family ties wishing to return to the area. This reflects genuine local housing need and supports community cohesion, aligning with NPPF 2024 paragraph 85.

## **6. Previous Appeal Refusal Addressed**

The previous appeal dismissal (APP/A2280/W/20/3245079) concerned a larger-scale proposal. The current approach focuses on a smaller, self-build-led scheme on the north-east portion, directly addressing prior concerns by maintaining strong landscape buffers and limiting built form. The appeal history should not prevent reconsideration.

## **7. Alignment with Cliffe & Cliffe Woods Neighbourhood Plan**

The proposals for SR22 are consistent with the objectives of the Cliffe & Cliffe Woods Neighbourhood Plan, which supports sustainable, well-designed small-scale housing development that respects local character and promotes community cohesion. Recognising the neighbourhood plan's policies further reinforces the site's suitability for limited self-build housing, aligning with both local aspirations and the wider planning framework.

#### **8. Relevant Appeal Decisions Considered but Distinct (APP/A2280/W/21/3285742 & APP/A2280/W/21/3288801)**

In addition to the earlier appeal dismissal in 2020, two subsequent appeal decisions—APP/A2280/W/21/3285742 and APP/A2280/W/21/3288801—have been reviewed. These cases concerned proposals on or near the SR22 land parcel, including areas along Merryboys Road. While both were dismissed due to concerns over landscape character, coalescence, and accessibility, the current submission differs fundamentally. It focuses on a materially smaller, self-build-led scheme situated on the north-east portion of SR22. Since those decisions, there have been improvements in local public transport services, a greater emphasis in planning policy on enabling self-build delivery (e.g., NPPF 2024 para 85), and a clearer understanding of the land's marginal agricultural value. These factors—alongside a revised and locally supported layout—demonstrate that the SR22 site can be brought forward in a manner that avoids the harms identified in past decisions. As such, the 2021 appeals do not represent an insurmountable barrier to limited development on part of SR22 and should not preclude its inclusion in the Local Plan as a suitable windfall or small-scale allocation under Policy T9.

#### **Summary and Request**

The exclusion of SR22 appears based on outdated or overstated constraints. Transport access has improved, the land is marginal agricultural, no meaningful coalescence risk exists, and local self-build demand is clear.

I respectfully request that Medway Council reconsider SR22 for inclusion as a small site allocation or as a windfall site under Policy T9, enabling locally supported, low-impact housing to meet identified needs.

Thank you for considering this representation.

Yours sincerely

Peter Lowe

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

---

Medway Local Plan 2041 – Regulation 19 Submission  
Site Reference: SR22 – Merryboys Road, Cliffe Woods

Participant Status: Landowner of Site SR22  
Representation Submitted: Yes – Regulation 19 representation submitted in support of SR22 allocation.

Reason for Request:

I wish to participate in the relevant hearing sessions concerning Site SR22 (Merryboys Road, Cliffe Woods) to assist the Inspector in examining the soundness and deliverability of the allocation.

As the landowner of the site, I am in a unique position to provide detailed and factual input on matters of site availability, deliverability, and alignment with Policy T9 (Self-Build and Custom Housebuilding). My Regulation 19 representation sets out the case for SR22 as a suitable and achievable location for small-scale, design-led self-build homes, sensitively integrated into the rural edge of Cliffe Woods.

Oral participation will ensure that key issues relating to phasing, landscape setting, local infrastructure capacity, and the site's consistency with the Cliffe & Cliffe Woods Neighbourhood Plan are fully understood and addressed through discussion.

I consider hearing attendance necessary to help ensure that the SR22 allocation is found sound, justified, effective, and consistent with national policy, particularly in relation to the NPPF's support for diverse, small-scale housing delivery and self-build opportunities.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** The exclusion of Site SR22 – Land at Merry boys Road, Cliffe Woods  
**Date:** 10 August 2025 14:17:46

---

Thank you for your email, I write to confirm I object regarding the exclusion of Site SR22 – Land at Merry boys Road, Cliffe Woods as previously outlined in my previous email.

Regards

Peter Lowe

Sent from my iPad

On 4 Aug 2025, at 11:46, policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)> wrote:

Thank you for your response to the Regulation 19 consultation on the Local Plan. This has been recorded as part of the formal responses to the consultation. Your comments will be published and shared with the Planning Inspector who will lead the examination of the Medway Local Plan.

We appreciate your engagement in this important stage of the plan-making process. The next stage will be the independent examination of the Local Plan. The examination will consider if the proposed plan meets tests of legal compliance and soundness.

To help the Inspector in reviewing the representations, your response should indicate whether you **support** or **object** to the Local Plan.

If you are objecting, your response should indicate if you have views that:

- The Plan is not legally compliant
- The Plan is not sound
- The Plan does not comply with the Duty to Cooperate

Further guidance is attached.

To assist the Planning Inspector and the council in processing your response, you may also choose to submit your representation having reference to the attached **Planning Inspectorate representation template**. While this is not a mandatory form, using the template will help ensure your comments are clearly structured and easier for the Inspector to assess.

If you wish to make any additional comments/clarifications based on a review of the form, please reply to us by 11 August. However, please be reassured that your comments have been recorded and will be part of the formal record published and shared with the Planning Inspector.

---

#### **Use of your personal data**

If you have written to us previously consenting for us to use your contact details as part of our Local Plan database, there is nothing further you need to do.

**If you haven't**, please do indicate if you **consent** to us holding your personal details to enable us to contact you for further Local Plan consultations and updates.

Please note that a copy of your representation (comments) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). Your representation will be 'made available' in line with the legal requirements. These are in The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35. This includes publication on Medway Council's website. This will include the names of people who made representations on the plan.

Information gathered during the process of consultation leading to the adoption of the Local Plan will be retained for as long as is necessary, in line with the Council's data protection policy.

Full details of the privacy statement are available here:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

This transmission is intended for the named addressee (s) only and may contain sensitive or protectively marked material up to RESTRICTED and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this transmission in error please notify the sender immediately.

This email has been scanned for viruses and all reasonable precautions have been taken to ensure that none are present. Medway Council cannot accept responsibility for any loss or damage arising from the use of his email or attachments. Any views expressed in this email are those of the individual sender and not necessarily those of Medway Council unless explicitly stated.

Please be aware that emails sent to or received from Medway Council may be subject to recording and/or monitoring in accordance with relevant legislation.

<Response Guidance.docx>

<Model\_Representation\_Form\_for\_Local\_Plans Template.docx>

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan 2041  
**Date:** 13 July 2025 11:40:41

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

I have had the opportunity to view your above plan and would like to provide the following comments.

I understand the need of councils to build new homes/houses but you/successive government are following the same plans as before and look how that has turned out. The need for social houses at a rent that is affordable for the majority of people who do not earn a salary of £25K and above is and should be a priority. 'Affordable' housing is not for people like this. Affordable housing is a farce. Just look at the substandard, small, unaffordable and poor-quality housing that has been erected in Medway alone. Many of which are taken by Londoners and asylum seekers (being moved out of London). Many on flood plains/near rivers (which will mean these properties will be uninsurable). These properties are the slums of the not-too-distant future. The concentration of flats around Mountbatten house/near bus station/river will become problematic in the future. Then there is the problem of unaffordable rents (made higher by DFL's from London) and unscrupulous property owners who do nothing about maintaining their property portfolio.

You are cramming in numerous houses in the only 'green belt' - Capstone. Finally, the multi-millionaires have got their way and building has already started along North Dane Way. No doubt the whole of North Dane way will have thousands of houses built on this green land. Take into account the building companies which are now backing out of providing money towards schools, roads, community funds (including your own Medway Development company). I have no doubt there will be problems with water and electric shortages as these companies cannot cope now!

Medway Council NEVER put the infrastructure in before the new builds. Take the Four Elms roundabout and the one near the airport. It's a nightmare trying to access these roundabouts and they need traffic lights urgently. As for all your wonderful 'transport schemes' of allowing no parking facilities on many new build plots and the constant encouragement to ride your bike or take the bus. Have you ever tried to carry heavy shopping or items on a bicycle? Or waited for buses that never arrive or are limited - plus the expensive cost of travelling by public transport. God knows how people will be able to travel off Hoo once all these houses are built.

Another factor is the lack of services available in Medway. Medway Hospital can't cope now and has nowhere to expand (only UPWARDS). GPs are struggling - especially primary care in our authority. As are schools. Along with the recruitment of teachers/GP's/etc

Another problem is the lack of properties or schemes for older people wanting to downgrade to smaller properties or bungalows. I fall into this slot. There are NO


government schemes for people like myself, in a three bedroom family home and finding the need to move due to mobility problems but the costs are far too expensive on my pittance of a pension when you have stamp duty and fees etc.

Another problem is in a low wage area are the town centres - which are frankly DEAD (not dying). I hate visiting the 'towns' (including Rochester) as it is full of drunks, people under the influence of drugs, anti social behaviour, dog faeces and litter. The parking is also costly and it's all parking APPS (which you also pay extra for on top of what is printed on your parking machines). This does NOT encourage me to enter, shop or be entertained in our 'towns'.

All of the above has been said before and no doubt all comments such as this consultation will be ignored and more homes/houses will be built without the proper infrastructure being taken into account. Over the years (and having worked for a local authority) I find these consultations are becoming a waste of time and just a 'tick box' procedure.

Lyn Wiles

## Model Representation Form for Local Plans

 <b>Medway</b> COUNCIL <i>Serving You</i>	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Julian"/>	<input type="text"/>
Last Name	<input type="text" value="Grayland"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Retired"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="ME2 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

---

## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached letter JG/LocalPlan2041/001 which outlines the reasoning of the soundness and legality of the proposals in the Local Plan 2041

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

**Please note** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>



14<sup>th</sup> July 2025

Ref JG/LocalPlan2041/001

Dear Sirs

I am writing to you with respect to the proposed Medway Local Plan 2041. While I understand the requirement for additional housing and agree the Medway Council needs to have a plan in place but it does, however, require to be the right plan for all concerned NOT the easy one.

I am therefore raising my objections in particular to the areas designated **Suburban development - West Strood** and in particular parcels of land **SNF1, SNF3, SR5** within the Medway plan and the cross-boundary development in Gravesham's Development plan of **Parcel 11** with its proposed 1385-1400 dwellings, which I do not believe are legally compliant or sound.

### 1.0 GREY BELT DESIGNATION

The areas in question have been designated for a number of years as '**Green Belt**' and as I have understood they have fulfilled their role. They have:

- Checked the unrestricted sprawl of large built up areas
- Prevented neighbouring towns from merging into one another
- Assisted in the safeguarding the countryside from encroachment
- Preserved the setting and character of the area
- Assisted in Urban regeneration by encouraging the recycling of derelict and other Urban land.

The National Policy as set out by the NPFF, I believe, attaches great importance to these Green Belt areas and as Medway only has 7% of Green Belt designated land, which is vastly smaller than surrounding Councils, it should be protected for its key purposes and for its habitat of the local flora and Fauna. No development with a bit of 'Green Space' can give back that habitat and it cannot be replaced once gone.

How these spaces have suddenly been designated '**Grey Belt**' and how this has happened is beyond me. The criteria for change of status, as far as I am aware, is for land within a Green Belt Area that has previously been developed but now abandoned e.g. old car parks or unsightly scrub land. None of these areas in question are this as they are prime, productive farm land that has been farmed constantly for a great number of years (42 years to my own knowledge).

In the Green Belt Review commissioned by Medway Council and undertaken in 2018 to assist in its production of the local plan relating to these areas of Green Belt it states in Section 4.2 of said document;

***"4.2.2 Purposes and Aims: High Contribution to purpose and Aims of Green Belt".***

It also states in Section 4.2.6 of these areas' contribution to the Green Belt status.

#### ***“4.2.6 Results and recommendation***

***High: This contribution is considered to be significant.***

***Recommendation: No change to Green Belt.”***

So why is it no longer contributing to its primary purpose???

When did the reassignment take place as I can find no record of this in the Public domain and how was this arrived at by the Council? Where are the Minutes pertaining to this matter and on what basis was the decision arrived at which is in complete reversal of an independent review's conclusion?

## **2.0 INFRASTRUCTURE**

Again, with areas indicated above, there is no infrastructure in place for the number of dwellings propose. Taking water in isolation the proposal of the development on the Medway areas using just 2 occupants in the dwellings, will need well in excess of 320,000 litres a day as taken from the Chartered Institute of Building Services Engineers (CIBSE) guidelines of 125/litres/day/person. With the cross-border development this rises to in excess of 1 MILLION litres per day.

We are currently experiencing difficulties in current **‘dry or drought times’** that are projected to increase in frequency in the coming years. Couple this with the need for additional power, sewage treatment and gas then without this in place prior to development the areas concerned cannot be considered viable for development at this time.

With respect to road infrastructure again this area is already highly congested with traffic both on the A289 By Pass and the A2 Watling Street. It can take up to 30 minutes on average to get into Strood Town Centre from Cobb Close with current traffic volumes. Add to this the additional cars, which with all the best will in the world will have an average at two per household, they will greatly increase traffic congestion and air pollution. This is particularly true for the area around Strood Academy where there is substantial congestion at drop off and pick up times. Here there is currently a high possibility of a serious accident with current behaviours and volume without the extra traffic volumes the proposed development will bring.

The roads are not in good condition with numerous potholes, etc. and additional traffic will just accelerate their deterioration at a much quicker pace. Even without the developments in question, the roads will struggle without further major up-grade as traffic flow intensifies with commuter traffic from the proposed development in Hoo, High Halstow, Grain, Allhallows and the Medway City Estate as the come on line. Higher volumes increase accident risk, congestion and poorer air quality. As congestion increases more drivers will seek the **‘RAT RUNS’** and clog up the local residential areas and thereby increase the risk of accidents/injury.

## **3.0 FACILITIES**

If the Gravesham Council also undertake the development of their parcel 11 i.e. the cross-border development until new schools are built, staffed and are operational the children of school age will place extreme burden on the Medway schools local to this area. This adding to the issues created at start and finish of **‘school day’** already in existence.

There does not appear to be any additional support for the increased population in the Medway plan in the form of Doctors, Dentists and amenities although I believe that this will be down to the Developers to a certain degree in the Gravesham element but there is no firm

requirement laid down as far as I am aware. Without Schools, Medical Facilities, Dentistry, etc., being established in the first phase (which is not in the Medway Plan) local amenities will be overrun. From personal experience 3-6 weeks to get a 'Medical Practitioner' (not even a Doctor) appointment and a 6+ hours wait at the Medway Hospital for even minor injuries. The Prime Minister agreed that **'any development must be accompanied by the right Health, Education and road infrastructure'** and this has not been taken into consideration.

Of course, the local GP practises will take these new patients as they have to but they do not have the resources now without these increased numbers. NOTE: Higham Surgery has indicated it wants to close...

#### 4.0 POLLUTION

As indicated with the bottle neck of traffic on the A2/M2 interchange, the A2-Walting Street and Medway bypass traffic the air pollution will increase substantially on a day by day basis. Add in the fact when there is high congestion i.e. road works e.g. **Lower Thames Crossing**, accidents/incidence this will substantial reduce the air quality in the area.

All the additional developments will also increase the light pollution in the area substantially.

#### 5.0 ALTERNATIVE IDEA

Instead of using Green Belt, prime agricultural land why not purchase via auction or compulsory purchase the vacant properties that come up for sale. Then using a contracted developer (obtained via a tendered process), managed by an independent Quantity Surveyor using an agreed Schedule of Rates and profit margin refurbish these properties. This will bring back currently unused property stock.

There are numerous redundant/redundant properties easily seen around Medway that could be reinstated. From investigation some 3,620 houses were sold at auction in Medway in the last year. If this option were taken up then over the next 10 years that would be approx. 36,000 brought back into the market. Properties that would easily cover the 24,540 properties that are required by Medway and indicated in the proposed plan.

This would require more effort /organisation instead of just handing it to a Developer but it would be much better for the residence of Medway.

#### 6.0. CONCLUSION

If this section of the plan (North Strood Suburban development) goes ahead in its current form particularly with respect there appears to be a great number of inherent flaws and it is too reliant on Developer's **'good will'** and planning i.e. delivering key elements at the appropriate time. The Council will be by agreeing with this section of the plan neglect their duty to protect **'Green Belt'**, blight the area with construction Access and Egress traffic over the next ten years and create undue stress and hardship both now and for the ongoing future of its residents, lose valuable, irreplaceable Green Belt prime food producing farmland and it associated habitat for local flora and fauna.

I await your response.

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway local plan 2041  
**Date:** 15 July 2025 21:01:46

---

You don't often get email from [REDACTED]. [Learn why this is important](#)

I send in my plea for some farmland to be saved

Please I beg you consider the food security of Medway

I suggest you put plans in place to ensure space is retained for something like Thanet Earth (Medway Earth)

The plan indicates that land at Grain and Kingsnorth is available on large sites therep to contribute to the low carbon economy. Is this land area most at risk of flooding?

Having a place like Thanet Earth at Capstone will provide employment and limit the costs of food distribution contributing to Medway's local economy with surplus food sold on.

Food security is as important as housebuilding and defence.  
We need water to drink and food to eat.  
We cannot eat weapons or bricks.

I say 'we' ... I'm really responding to the local plan on behalf of my children and grandchildren.

I'm stressing food security ... education and healthcare are also important.  
Even with more care in the community, health centres (hospitals) of excellence surely need to be part of the plan. I noticed schools and care homes are mentioned.

All the best, I'd appreciate a response, (not just an acknowledgement that its been received,) to this email.

Jill Lovell

[REDACTED] ME8 [REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Date:** 17 July 2025 14:05:48

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## MEDWAY LOCAL PLAN 2041 - COMMENTS

Having seen the Medway Local Plan 2041 Summary Booklet Regulation 19 I wish to make the following comments.

### **Urban Regeneration - Frindsbury Peninsula(page 7)**

1. I submit that the plans for urban regeneration of the Frindsbury Peninsula are ill advised, counterproductive, costly, would destroy employment and should be vigorously opposed.
2. The Medway City Estate was developed in the 1980s/1990s from derelict marshland and has proved to be a great success story employing thousands of staff in a great variety of industries ranging from shipping, manufacture, services, recycling, publishing to name just a few. Apart from BAe at Rochester Airport it is the principal employment base in Medway. To put this major successful source of employment at risk and replacing it with housing seems folly. Has Medway Council not learnt from the Chatham Docks Fiasco where successful businesses are being forced out because of land speculators such as Peel Ports?
3. Whenever a massive repurposing of a site is proposed there is a high probability that many of the businesses forced with relocation will shut up shop or move outside the area completely.
4. The justification for such an action seems very flimsy indeed. Who is the "large employer who has put forward plans that would be a catalyst for long term change" (page 7). It is very easy to be seduced by speculative claims such as this. Large employer in what field? Is it simply a property developer? Much more evidence is required to justify the redevelopment - not just a wish list.
5. Such a scheme would also produce planning blight. Which firms are going to set up or expand businesses in Medway City Estate if they know their future there is time limited.
6. Medway City Estate is home to Scotline - a highly successful British Company that operates a fleet of ships with its engineering base on the Frindsbury Peninsula and busy riverside wharfs at The Scotline Terminal and the Transit Wharf. It handles timber, packaged wood, cement and project cargoes. It is one of the major import terminals in the UK for timber imports. To force out the last major riverside shipping operation on this part of the Medway would be a huge mistake and the end for Rochester as a commercial port.
7. There is no evidence that replacing industry by a great many houses would reduce traffic and lead to less congestion. The exact opposite is more likely!
8. There are many other smaller sites (already derelict) that should be considered for housing such as (for example) Canal Road Strood (opposite Strood Station), Spembly Works New Road Chatham. Utilising parcels of smaller unused sites is a preferable option to a large scale development (at huge cost) putting employment at risk. There needs to be a much better evaluation of all these derelict or unused smaller sites than going for the apparently easy option of a large site with its attendant high risk to employment. If you are


looking for innovative ideas, how about using Hoo Island for housing with a causeway to the mainland?

9. In summary I totally oppose the redevelopment of Medway City Estate.

Roger Backway

ME1

## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Roger"/>	<input type="text"/>
Last Name	<input type="text" value="Backway"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="ME1 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

---

## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="No"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Ref as above plus Summary Booklet Regulation 19 Page 7**  
**Urban Regeneration - Frindsbury Peninsula**

1. I submit that the plans for urban regeneration of the Frindsbury Peninsula are ill advised, counterproductive, costly, would destroy employment and should be vigorously opposed.

2. The Medway City Estate was developed in the 1980s/1990s from derelict marshland and has proved to be a great success story employing thousands of staff in a great variety of industries ranging from shipping, manufacture, services, recycling, publishing to name just a few. Apart from BAe at Rochester Airport it is the principal employment base in Medway. To put this major successful source of employment at risk and replacing it with housing seems folly. Has Medway Council not learnt from the Chatham Docks Fiasco where successful businesses are being forced out because of land speculators such as Peel Ports?

3. Whenever a massive repurposing of a site is proposed there is a high probability that many of the businesses forced with relocation will shut up shop or move outside the area completely.

4. The justification for such an action seems very flimsy indeed. Who is the "large employer who has put forward plans that would be a catalyst for long term



change" (page 7 Summary Booklet Regulation 19). It is very easy to be seduced by speculative claims such as this. Large employer in what field? Is it simply a property developer? Much more evidence is required to justify the redevelopment - not just a wish list.

5. Paragraph 14 of The Plan mentions a Medway City Estate Vision Concept Plan put forward by Farrells (who are they?) in 2010. It is thus way out of date.

6. Such a scheme would also produce planning blight. Which firms are going to set up or expand businesses in Medway City Estate if they know their future there is time limited.

7. Medway City Estate is home to Scotline - a highly successful British Company that operates a fleet of ships with its engineering base on the Frindsbury Peninsula and busy riverside wharfs at The Scotline Terminal and the Transit Wharf. It handles timber, packaged wood, cement and project cargoes. It is one of the major import terminals in the UK for timber imports. To force out the last major riverside shipping operation on this part of the Medway would be a huge mistake and the end for Rochester as a commercial port.

8. There is no evidence that replacing industry by a great many houses would reduce traffic and lead to less congestion. The exact opposite is more likely!

9. There are many other smaller sites (already derelict) that should be considered for housing such as (for example) Canal Road Strood (opposite Strood Station), Spemby Works New Road Chatham. Utilising parcels of smaller unused sites is a preferable option to a large scale development (at huge cost) putting employment at risk. There needs to be a much better evaluation of all these derelict or unused smaller sites than going for the apparently easy option of a large site with its attendant high risk to employment. If you are looking for innovative ideas, how about using Hoo Island for housing with a causeway to the mainland?

10. In summary I oppose the total redevelopment of Medway City Estate with housing replacing successful employment land.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The site should be mixed use, preserving the employment sites and especially the Scotline and Transit wharfs for commercial shipping whilst at the same time opening up some of the riverside where possible for river walks. That should be possible without forcing industry out. The river is a thriving commercial port – some of us find that more attractive than yet more housing in the wrong place.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ no

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Lower Rainham Concept Plan  
**Date:** 20 July 2025 15:30:56

---

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

After viewing the Local Plan I wish to add the following comments on the plan to build on the apple orchards north of the railway line in Rainham.

As a Rainham resident who loves to walk the footpaths between the orchards I view this development with horror. These orchards are to me the last green lungs of Rainham and to walk through them is to drink in the delights of the countryside away from the urban sprawl which is Rainham today.

This development is ill conceived and ill planned. It will only add more traffic on to the local roads, especially the Lower Rainham Road which wasn't built to cope with the volume of traffic it has at present.

The land where the development is to take place is prime agricultural land and is described as best most versatile and surely with the large increase in population which is occurring at the present time we need to keep as much of our agricultural land as possible to sustain our population.

I would like to take part in the hearing sessions during the formal examination of the plan and hope you will consider my comments when taking this further.

Sarah Wood

I

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Fw: objection to local plan part policy sa6 relating to strood west  
**Date:** 21 July 2025 13:20:00

---

You don't often get email from [REDACTED] [Learn why this is important](#)

To whom it may concern

Whilst I support the need of a Local Plan, in principle, and only if the housing and facilities are for **MEDWAY** residents only.

However, I do not support the part for Policy SA6 (relating to Strood West) as I have grave concerns.

Green Belt shouldn't be used as it prevents urban sprawl, once it has gone there no getting it back, this is really important for the residents of Strood!  
Why the shift on the use of the land has not been addressed before now?  
The NPPF clearly states that Green Belt boundaries should only change in exceptional circumstances.

'Grey belt' is not an official planning category, this Green Belt land is used for farming.

Why not look at the green belt in Halling , why are you taking most of Strood's green belt?

Why was brownfield not approached first?

Inadequate infrastructure, increase on the roads, public transport, shopping facilities, utilities (gas, sewage, electricity, water), flood defences.

Healthcare is already at its maximum for Doctors, hospitals and dentists.

Schools are at capacity.

Air pollution, noise pollution and light pollution will be heavily affected.

Effect on residents' mental health .

Live Oil Fuel pipeline that feeds Gatwick Airport

Major safety concern and health concerns.

Who insures the pipeline? - have they been made aware of the Local Plan?

With regards to the meeting between Medway and Gravesham councils , why were the public not involved and where are the notes from these meetings so the public can see what is being discussed? The process has not been in the public eye.

Has a full traffic survey and impact analysis been completed and assessed?

Medway Council appears to be working too closely with developers, local residents are not being listened to.

I therefore STRONGLY object to Policy SA6 (relating to Strood West).

Claire Glover

[REDACTED]

[REDACTED]

[REDACTED]

Me2 [REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan  
**Date:** 22 July 2025 09:28:28

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[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Sir/Madam

21.7.25

Re Medway Towns Local Plan

I wish to object to the recent decision of Medway Council (along with Gravesham Council) to re-classify the designation of green belt land behind Brompton Farm Road and Rede Court Road, Strood to grey belt land.

The Government originally set out just a year ago greybelt should be for poor quality and ugly areas, which these in Strood are patently not. The Government's current definition of greybelt includes land on the edge of settlements or roads, as well as clearly brownfield sites such as old petrol stations and car parks. The land behind Brompton Farm Road and Rede Court Road, Strood does not enter that category.

Not only will any building on this area impact on light pollution, there is also the problem of extra traffic in the Medway towns, which at times comes to a standstill because of the poor management of Strood town centre.

- Our road structures in Strood are significantly under pressure already, especially so at busy times since the Council agreed changes to traffic flow in Strood High Street. It is almost impossible at times to exit Cliffe Road right onto North Street already. If more housing is allowed the roads will be fully blocked, most of the time.

- With the new tunnel proposed from Essex to Kent, the infrastructure of the roads in this area will be heavily impacted. It won't relieve our traffic problems but increase them. Already traffic grinds to a halt at M2/A2 junction at busy times.

- The green lung behind Rede Court Road and Brompton Farm Road is extremely important for vital wildlife including bats, which are protected, and community wellbeing. To build on it will just provide an urban sprawl with no barrier to the Medway by-pass route.

- The Clean Air Act will surely be compromised because of the increase in fumes, amount of cars etc –if it is already not so with the pressure of traffic – does the Council monitor this?

- If this detrimental development goes ahead, the services such as GP's, and the Hospital which are already under real pressure, will surely collapse under extra housing and associated people in the area. It is almost impossible to get a face to face GP appointment now. I understand in Higham there is a proposal to close a surgery.

- Many years ago a Cottage Hospital was on a previous Local Plan for this area, this was quietly dropped. Since then there has been much housing development, even before the current plan. Perhaps if this plan goes ahead facilities such as medical and schools should be built before the houses and before the likelihood of the housing developers going bankrupt.

How will the dangerous gas pipeline be protected if development is allowed? Some local residents already are not allowed to build sheds, plant trees etc because of this pipeline.

Please add to the Plan a reinstatement of Stonehorse Lane in its entirety, building a bridge over the link road, joining previous routes still existing for hikers. This has been requested several times in the past, and would be helpful if added to the new Local Plan, and a Park and play area – possibly near the bat area.

Will the capacity for the Sewage farm be strong enough to take all these proposals.

Also please protect all existing footpaths in the area if building is allowed, having walked them for 45 years, they have been a delight and will be a severe loss to the area if removed. Again they provide links to further

walking routes, which has to be encouraged and surely is a Government initiative.

Finally the plans to re-locate Medway City Estate to the Kingsnorth area seems crazy. Why move successful businesses which have direct links to the relief road to the A2, and the Medway tunnel. Perhaps build the proposed 690 houses at Kingsnorth instead.

Hoping some consideration will be taken at least to some of these points if not all.

Thanking you

Yvonne Tatnall, [REDACTED], ME2 [REDACTED] [REDACTED]

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This email has been checked for viruses by AVG.

<https://www.avg.com>



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection t SA10 Rainham ParksidVillage  
**Date:** 22 July 2025 18:19:38

---

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir or Madam of the planning office and Naushabah Khan, I am writing to you to please help us with our objection to the (SA 10 Rainham Parkside Village) Who ever came up with this *idea*,

There is no infrastructure which can possibly cope with the traffic that this is going to add to already queuing of traffic we have estimated properly another 1500 cars on these busy little roads, We are asking for you to help with this living here is becoming a Nightmare Yours Faaithfully Mr Mrs Tanner

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** OBJECTION to SA10 Rainham Parkside Village  
**Date:** 22 July 2025 18:56:14

---

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir or Madam planning office and Naushabah

I MUST COMPLAIN

I am so disappointed with the new planning at Pump Lane area  
We are so compressed in Rainham, Lower Road area, you cannot drive  
anywhere without meeting a holdup of some sort, As to all new and just completed in the  
area, no thoughts at all is made about people's lives and needs Just build and sort things out  
later if at all

Mr R S TANNER

Sent via BT Email App

Planning Policy Team  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
ME4 4TR

Sam Hatton

[REDACTED]  
[REDACTED]  
ME2 [REDACTED]

23 July 2025

**Subject: Formal Objection to Removal of Land North of Brompton Farm Road from the Green Belt – Regulation 19 Local Plan**

Dear Planning Policy Team,

I am writing to submit a formal objection to the proposed removal of the land situated to the north of Brompton Farm Road, Strood, from the Green Belt, as outlined in the emerging Medway Local Plan 2041. I also object to its potential reallocation as a "Grey Belt" or development-ready site. My objection is based on a clear absence of policy justification, lack of legal compliance, and significant planning harm, as outlined in the sections below.

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**1. Failure to Demonstrate Exceptional Circumstances – Non-compliance with NPPF Paragraphs 144–147**

The National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in "exceptional circumstances," and only through the Local Plan process. At present, Medway Council has not provided sufficient evidence that such circumstances exist, specifically:

- There is **no demonstrable evidence** that all reasonable alternatives, particularly brownfield and underutilised land, have been exhausted. Chatham Docks and Medway City Estate, while presented as options, should be sufficient on their own when fully utilised. Additional viable regeneration opportunities should also be actively explored.
- The cited housing requirement does not override national Green Belt policy. Recent updates to the NPPF and Government statements explicitly reaffirm the **continued strength of Green Belt protections**, discourage unjustified changes and confirms Local Authorities are under no obligation to revise Green Belt boundaries solely to meet housing targets. Examples include;
  - [Government Response to Levelling-Up Bill \(2025\)](#); "Green Belt boundaries are not required to be reviewed or altered to meet housing need. Any boundary changes must be within Green Belt plan processes and supported by exceptional circumstances."
  - [Response to Planning Select Committee \(2024\)](#); "The Government "has no plans for a national review of the Green Belt" and remains committed to protecting and enhancing it, as per its Manifesto."

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**2. Ongoing and Strong Contribution of Green Belt Purposes**

The subject site continues to fulfil the five purposes of the Green Belt as defined in Paragraph 140 of the NPPF:

- **Restricts urban sprawl** by acting as a physical and visual barrier between built-up areas and open countryside.
- Maintains the **distinct rural setting of Strood** and protects the Medway Valley's landscape character.
- **Prevents the merging** of Strood's urban edge with neighbouring rural settlements.
- **Encourages urban regeneration** by limiting development options on greenfield land.
- The land is **actively used** as orchard and/or farmland, contributing to the rural economy and local food security.

There is no policy or visual evidence to suggest that this land has lost these critical functions. As such, its reclassification is wholly unjustified.

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### 3. Environmental Sensitivity and Landscape Character

The land in question is environmentally sensitive, contributing to the local biodiversity network and rural character. Specifically:

- It remains **undeveloped, open and visually prominent**, providing long-distance views across the Medway Valley and acting as a buffer to built form.
- The area is adjacent to existing **hedgerows and woodland corridors** likely supporting protected species, including birds, bats, and small mammals.

To date, **no ecological assessment** has been published to support the proposed reallocation. Without this data, the environmental implications of development cannot be evaluated properly.

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### 4. Unsuitable Infrastructure and Lack of Sustainability

This site fails several key sustainability tests and is poorly positioned to accommodate housing growth:

- **Transport and Highways:** The road network in the immediate area, including Brompton Farm Road, is already experiencing **serious congestion**, exacerbated by a lack of viable public transport links or pedestrian infrastructure.
- **Public Services:** GP surgeries, dentists, and primary schools in the Strood area are **over-subscribed and under-resourced**. As personal examples, I was recently forced to contact 56 dental practices before registering my wife as an NHS patient, which ultimately required travel to Sittingbourne - over 9 miles away. It regularly takes me over 30 minutes to drive less than 2 miles to Rochester Station for my morning commute and up to 2 weeks for a doctor's appointment at Cliffe Woods Surgery.
- **Social Sustainability:** Adding further development pressure in this location would **worsen existing shortfalls**, not alleviate them.

These deficits render the site unsustainable under current national and local planning frameworks.

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### 5. Planning History Supports Continued Protection

The land has already been the subject of two separate planning applications, for 122 and 135 homes, both of which were **refused by Medway Council**. The refusal grounds included:

- Significant harm to the Green Belt
- Unsustainable location with poor infrastructure
- Negative impacts on landscape and local amenity

These determinations remain valid and have not been addressed or rebutted through the current Local Plan proposals. It would be entirely inconsistent, and procedurally unsound, for

the Council to now designate this land for development under a different guise.

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## 6. Political and Community Opposition

The site has attracted strong and sustained opposition from the local community and elected representatives. This includes:

- Multiple local petitions and formal written objections
- Opposition expressed in Council minutes and community forums
- Media coverage and public commentary denouncing the proposal

This reflects a **clear and enduring local consensus** that this land is valued, necessary, and should remain protected. The principle of community engagement, as outlined in the NPPF and Localism Act 2011, must be respected.

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## 7. Conflict with Recent National Environmental Policy

The December 2023 update to the NPPF, as well as DEFRA's statutory guidance on Local Nature Recovery Strategies (LNRS), commit to:

- **Maintaining existing environmental protections**
- **Avoiding development on land of environmental value**
- **Mapping land of future ecological or biodiversity significance**

Releasing such land for development under a “Grey Belt” label directly undermines these national commitments. LNRS mapping and biodiversity priorities must inform, rather than be ignored, by the Local Plan.

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## 8. Legal and Procedural Concerns

There are serious concerns about the legal robustness of the Grey Belt designation process:

- The **policy change relating to Strood’s Green Belt was not disclosed** until publication of agenda papers ahead of the Council meeting on 26 June 2025. This raises questions about procedural transparency and public engagement.
- At the time of this policy inclusion, **Gravesham Borough Council’s Regulation 19 Local Plan** had not yet been published. Therefore, any justification based on joint strategic planning remains **premature and speculative**, not evidence-based.
- The 2025 in-house Medway Green Belt Review was said to be ‘**critiqued by independent consultants**’, yet no details of the procurement process, conflict of interest assessments or outcomes have been shared. This fails to demonstrate fair, open and transparent principles.
- Section 14.10.5 of the draft Local Plan mentions a high-level joint masterplan between Medway and Gravesham Councils. To date, **this document has not been made available for public scrutiny**, undermining the Plan’s evidence base.
- The Medway Local Plan’s definition of “Grey Belt” also **fails to align** with the Government’s national interpretation (e.g., previously developed land such as car parks or petrol stations), which explicitly excludes productive greenfield land such as that on Brompton Farm Road.
- Furthermore, individual site assessments for Parcels 1–4 (Sections 3.1–3.4) assert that development would not result in the merging of Strood and Gravesend. However, this view **ignores the disproportionate increase in Strood’s urban footprint**, which would grow by nearly one-third. This clearly contradicts the Green Belt’s purpose of preventing unchecked urban sprawl.

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I respectfully request that Medway Council retain the land north of Brompton Farm Road in accordance with the National Planning Policy Framework (NPPF) and the precedent set by

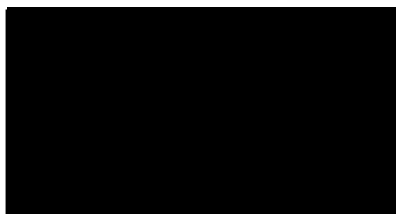
previous planning refusals. Furthermore, I urge that this site be removed from any development allocation in the emerging Local Plan. This location is inappropriate for reclassification or development and should be preserved in its current form for the benefit of future generations. The area lacks the necessary infrastructure, transport capacity, and public services to support further development, making it an unsustainable and unsuitable location for future growth.

Yours faithfully,

A solid black rectangular box used to redact the signature of Sam Hatton.

Sam Hatton BSc MCIPS MICW

**Ms Nicola Jane Smith**



**ME2**

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24<sup>th</sup> July 2025

Planning Policy Team and Planning Inspector  
Regeneration, Culture, Environment and Transformation  
Medway Council  
Gun Wharf, Dock Road  
Chatham  
Kent  
ME4 4TR

Dear Sir/Madam,

**Strong Full Objection to the Medway Council Local Plan – in particular the Strood West Proposal**

I am writing to formally and strongly object to the Medway Council's Local Plan with a particular focus the Strood West proposal. As a long-standing resident of Medway, I have significant concerns regarding the impact of this proposal.

**1. Preservation of Green Belt Land**

The Green Belt serves as a crucial buffer between urban areas, preventing urban sprawl and maintaining the distinct character of our towns and villages. The proposed merging with Gravesham Council's Green Belt threatens to undermine these principles. The Green Belt in this area is not just a line on a map; it is a vital ecological and recreational resource that supports biodiversity, provides essential green space for residents' wellbeing, and contributes to the overall environmental health of the region.

**2. Environmental Impact**

The development of the Strood West area would lead to the loss of valuable green belt land, which is home to various species of flora and fauna. This loss would have a detrimental effect on local biodiversity and the natural habitats that these species rely on. The Green Belt is home to a variety of wildlife, including bats, birds, birds of prey, mice, and voles. The disruption of these habitats would have a significant negative impact on these species. Additionally, the Green Belt plays a significant role in carbon sequestration, helping to mitigate the effects of climate change. Reducing this green space would counteract efforts to reduce carbon emissions and combat climate change.



### **3. Agricultural Value of Chapter Farm**

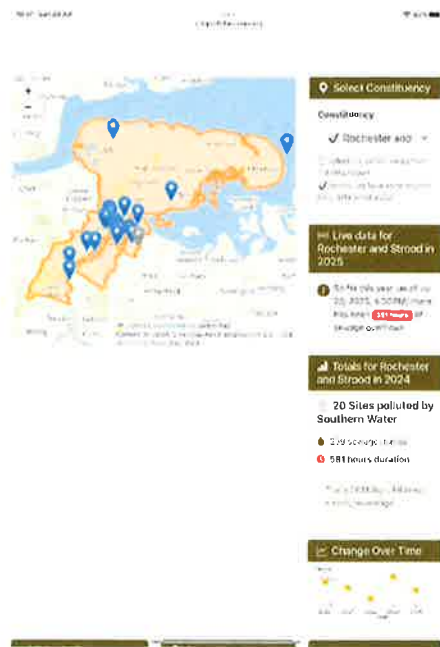
Chapter Farm has been used for farming for decades, and in the last 10 years, it has produced essential crops such as barley, beans, oilseed rape, potatoes, bird seed, and wheat. These crops are vital for the UK's food security and agricultural economy. The land's productive use underscores its value as Green Belt land, and it is immoral to downgrade it to grey belt for development purposes.



### **4. Infrastructure and Services**

The proposed development would place additional strain on the existing infrastructure and services in the area. Roads, public transport, healthcare, sewerage (see image below) and educational facilities are already under pressure, some even at breaking point and further development would exacerbate these issues. The current infrastructure is not equipped to handle the increased demand that would result from the proposed development, leading to potential declines in service quality and accessibility for current residents.





## 5. Community and Quality of Life

The Green Belt provides not only farming but excellent for physical and mental well-being for residents. The loss of this green space would negatively impact the quality of life for the local community. The distinct separation between urban and rural areas is a key aspect of the character and identity of our community, and merging with Gravesham's Green Belt would erode this distinction. The Local Plan will cause more air and light pollution. Quite rightly, Gravesham Borough Council in 2019 objected to grant permission of land for development.

## 6. Kent Air Ambulance Landing Platform

The green belt is used by the Kent Air Ambulance as a landing platform. This is a critical service that provides emergency medical assistance to residents in need. The loss of this landing platform would hinder the ability of the Air Ambulance to operate effectively, potentially putting lives at risk.

## 7. Oil Pipeline

Chapter Farm is also the home to a **live** oil pipeline that feeds UK airports. This pipeline is a critical piece of infrastructure, and any development in this area would pose significant risks to its operation and could cause serious health and safety risks to local residents. The presence of this pipeline further underscores the importance of preserving this land as Green Belt. On 2<sup>nd</sup> January 2019, CLH Fisher German LLP advised Medway Council that they objected to planning and works would **not** be given consent as development would restrict access to the pipeline, both for routine maintenance and in an emergency situation.



Map showing position of Pipeline

### **8. Evidence of early talks with property developers and predetermined voting by Labour Councillors**

Residents first knew of the proposals when surveyors were seen on the Green Belt. This is extremely suspicious and underhand of Medway Council. The Consultation should have been 12 weeks, but we have only had 6 weeks – conveniently clashing with school summer holidays. It was clear at the Council meeting, 26<sup>th</sup> June 2025, that Labour councillors were predetermined on positive voting for the Local Plan to be pushed through to next stage. Local events were pre-planned already set up for the 30<sup>th</sup> June 2025 onwards and paperwork printed.



Clinton Avenue, Chapter Farm – Strood West - Already surveying the land – 5<sup>th</sup> June 2025 – first instance of residents being aware of Local Plan.

15<sup>th</sup> July 2025 – Romsey Close, Chapter Farm – Strood West – more surveying



## **9. Alternative Solutions**

I urge for alternative solutions that do not involve the loss of precious Green Belt land. Once we have ruined and taken away our Green Belt, we cannot get it back. There are opportunities for brownfield site development and the regeneration of underutilized urban areas that can accommodate growth without compromising our green spaces. These alternatives should be thoroughly explored and prioritized to ensure sustainable development that respects the environment and the needs of the community.

In conclusion, I strongly oppose the Strood West proposal and the merging with Gravesham Council's Green Belt. I urge for reconsideration for this aspect of the Local Plan and to prioritise the preservation of our Green Belt for the benefit of current and future generations. Medway Council's strap line is Serving You.... Please adopt a Local Plan that Serves current residents.

**Green Belt farming land matters –  
it is far more important than a new housing estate.**

Thank you for considering my objections. I look forward to your response.

Yours faithfully

A large black rectangular box used to redact the signature of the sender.

Ms Nicola Smith

## **Additional information / comments re Local Plan**

### **Comments under Part B, No. 5**

#### **Green Belt Encroachment**

These areas give paramount importance to Medway and the loss would massively impact community wellbeing and biodiversity as well as prevent UK Farming.

Why were the Medway residents not consulted over the Green Belt Review?

An error has been made in naming of the Strood's Green Belt as a council approved Residential-led Site Allocation for major housing development. The map excludes 130 dwellings on Commissioners Road Pit, Strood. This should be fully reviewed.

4.12.3 and 4.12.4 Medway Council states Grey Belt policy change for Strood Green Belt. There was absolutely no mention of this to the public! This first came to light at the Council Meeting on 26<sup>th</sup> June 2025 when the public gallery is not allowed to comment. Why was the review not made available for examination? Clearly a failure on Medway Council's process. Gravesham's Local Plan is still not agreed, and it was wrong of Medway Council to presume rather than wait for agreement.

14.10.5 – why commission landowners and developers to prepare a high-level plan to inform the framework of policy? Again, residents not given the opportunity to review and question.

The Government's Grey Belt current national guidance (NPPF & PPG) is only a year old and not tested on a large scale. The NPPF clearly states that Green Belt boundaries should only change in exceptional circumstances.

Grey Belt is considered to be poor quality and ugly areas – not at all what we see on **Chapter Farm – yes, a Farm!!!!**

**Land we successfully grow crops on, year after year. Food for the UK.**

Not a grey bit of land in sight. **Green, beautiful green land.**

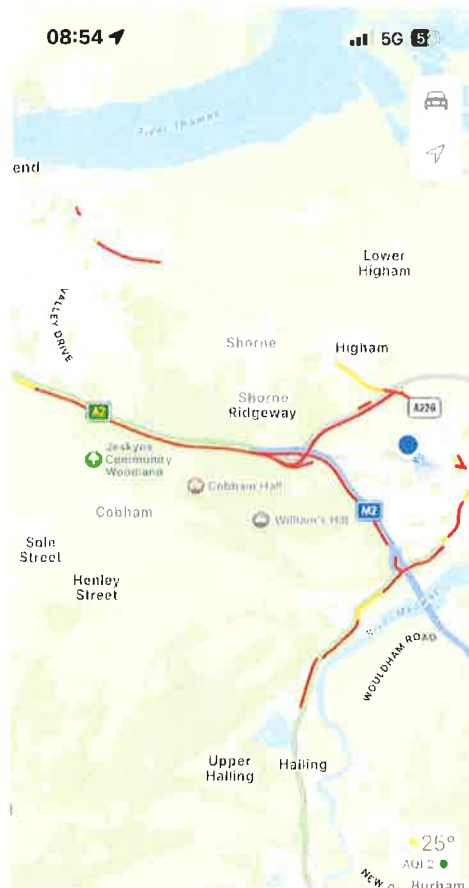
**Take a moment to reflect on the beautiful Green Belt land we have.....**

**Let's protect it**





## Strood – A2 - Photos showing traffic jams / issues regularly faced by commuters



Tuesday 1<sup>st</sup> July 2025, 08:54 am

Joining the A2/M2 junction London Bound  
Tuesday 1<sup>st</sup> July 2025, 08:40 am



Wednesday 2<sup>nd</sup> July 2025 – 08:14 am



Zoomed in to show current traffic issue  
Wednesday 2<sup>nd</sup> July 2025 – 08:14 am



Wednesday 2<sup>nd</sup> July 2025 – A289 –  
17:03 pm



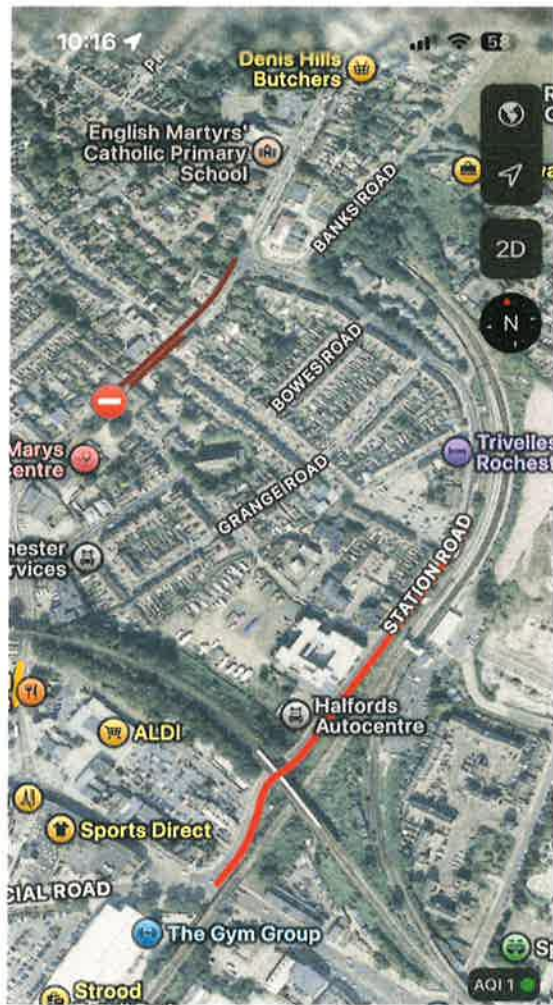
Thursday 3<sup>rd</sup> July 2025 – 07:51 am



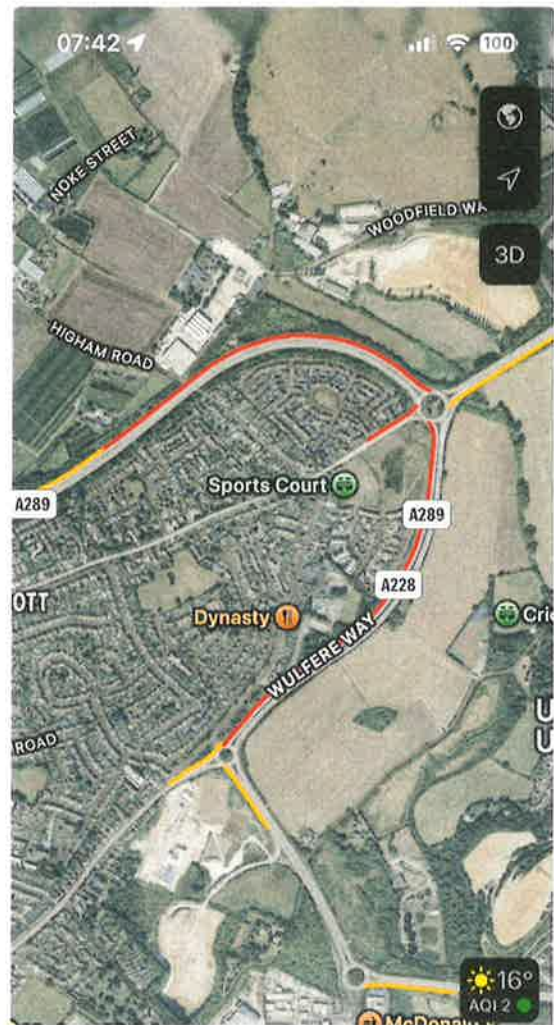
Thursday 3<sup>rd</sup> July 2025 – 11:05 am -  
Dartford Crossing QEII Bridge closed until  
midnight (4<sup>th</sup> July) southbound after  
collision involving HGV – with a large fuel  
spillage across lanes.



Monday 7<sup>th</sup> July 2025 – 07:43 am



Monday 7<sup>th</sup> July 2025 – Medway towns –  
traffic jams due to a 4 week road closure  
– still red even after the early commute!!  
10:16 am



Tuesday 15<sup>th</sup> July 2025 – Accident on Four  
Elms Hill, Hoo - 07:42 am



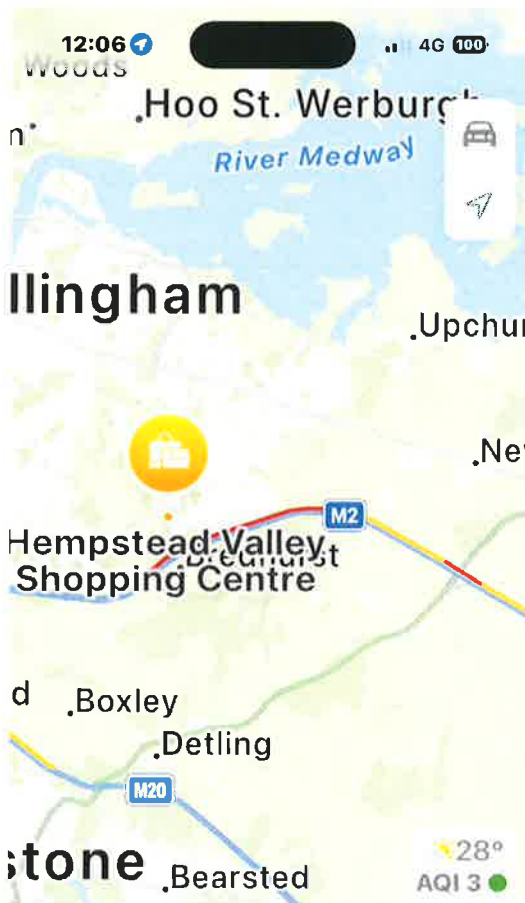
Strood – M2 - Photos showing traffic jams / issues regularly faced by commuters



29<sup>th</sup> June 2025



21<sup>st</sup> June 2025 – a Saturday lunchtime!



21<sup>st</sup> June 2025 – a Saturday!



21<sup>st</sup> June 2025 – a Saturday!



Strood - Photos showing drainage / flooding issues

Rede Court Road, Strood



Green Belt Field – back of Romsey Close and end of Clinton Avenue



## **Further comments on the Local Plan validity:**

### **Infrastructure**

The Local Plan has no clear pathway for agreed fully funded projects for new schools, better roads (A2 and M2 in particular are horrendous at peak times) and healthcare. Getting a doctor's appointment is so difficult now, let alone with new houses being built. Public Services are already at capacity. Our A&E department has shocking wait times. Residents typically wait months for hospital appointments, pushing a year for some clinics, for example, ENT. Even booking a driving test is a challenge - you are lucky to get one within 7 months.

### **Community Engagement**

Medway Council needs to communicate better with residents, to allow public engagement. Labour Councillors have already changed their stance on the Chatham Docks. This area is an employment base – providing work for local residents.

Developing Policies found in Regulation 18 had safeguarded all of Medway's Green Belt.

Medway's Local Plan map identifies 20 parcels of Green Belt land – parcel 1 is in Gravesham Borough. An example of rushed work. Why are parcels 1 – 4 being identified as preferred sites? This would make Strood huge! Or are we joining Gravesham?

Development at Commissioners Road Pit was approved 2017, infilling commenced in 2019 – surely this space should be developed first.

Green Belt Policy S7 section 4.12 of the Local Plan 2041 (Reg 19) and the Land West of Strood Policy SA6, section 4.10: The Green Belt policy is massively changed from the Council's original policy which was supported by studies.

**We have a duty and responsibility to care for our land.**

**We do not want a concrete world for our future generations.**

**Let's do the right thing: Protect our Green Belt Land.**





**From:** [representations\\_planning](#)  
**To:** [policy\\_planning](#)  
**Subject:** FW: Representation in response to Regulation 19 draft LOCAL PLAN  
**Date:** 24 July 2025 12:05:16  
**Attachments:** [image001.png](#)

---

Kind Regards

[REDACTED] | Medway Council

**Planning Service | Medway Council**

Gun Wharf, Dock Road, Chatham, ME4 4TR

[REDACTED] | **Web:** [medway.gov.uk](http://medway.gov.uk) | **Email:**

[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)

**Twitter:** @medway\_council | **Facebook:** Medway Council



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---

**From:** [REDACTED]  
**Sent:** 24 July 2025 12:02  
**To:** representations, planning <planning.representations@medway.gov.uk>  
**Subject:** Representation in response to Regulation 19 draft LOCAL PLAN

You don't often get email from [REDACTED] [Learn why this is important](#)  
24th July 2025

## **Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan**

I write to you as a local resident in the village of Hoo St Werburgh on the Hoo Peninsula. This is a representation in response to Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

### **The Local Plan is not legally compliant or sound for the following reasons.**

Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.

Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.

*Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).*

**Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan** (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.

Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.

Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable location) and maximise development allocations in the urban area (a more sustainable location). This is crucial in order to reduce impacts on the Hoo Peninsula's habitats and wildlife.

MRS ALISON WELLS [REDACTED]. ME3 [REDACTED]

**24th July 2025**

**From:** [representations, planning](#)  
**To:** [policy, planning](#)  
**Subject:** FW: Representation Regulation 19 Local Plan  
**Date:** 24 July 2025 14:50:45

---

## Planning Service | Medway Council

Gun Wharf, Dock Road, Chatham, ME4 4TR

**Phone:** 01634 331700 | **Web:** [medway.gov.uk](https://www.medway.gov.uk) | **Email:**

[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)

**Twitter:** @medway\_council | **Facebook:** Medway Council

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---

**From:** [REDACTED]  
**Sent:** 24 July 2025 14:46  
**To:** representations, planning <[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)>  
**Subject:** Representation Regulation 19 Local Plan

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**Representation in response to**

**Medway Council's Regulation 19 pre-submission draft Local Plan**

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**Name: Robert Wells Address: [REDACTED] ME3 [REDACTED]**

**Date: 24th July 2025**



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway local plan 2041  
**Date:** 25 July 2025 11:50:22

---

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## Medway local plan Suburban development-west Strood

Hi

I have lived in Medway all of my 56 years!

I have seen lots of changes in Medway in that time, some good and some not so good. Councils changing traffic directions, then converting them back. Building, converting offices for themselves, then demolishing them when no longer required.

My family and I are horrified, at the new planning proposals.

We do not have the infrastructure, hospitals, police, fire service, ambulances, doctors, dentists, schools, social care, sewage, water resources to name a few for the size of these developments.

West Strood proposed development, have you been there? It is a beautiful area of Medway, with fabulous wildlife, birds, bats, newts, trees and plantlife. It is a part of Medway, where it is in the country side! Makes you feel good for walking and enjoying nature, good for ones soul & mental health. Many people enjoy walking & cycling in that area, taking in the beautiful scenery. How this Greenbelt land, has been down graded to Greybelt land, I truly do not understand. It is a criminal act, like graffiti!

Strood cannot cope with the amount of traffic, we have at the moment. Constant roadworks and accidents. More cars, will cause endless more traffic jams. Blocking up our already chocked roads. Giving off more pollution into the environment, and causing more asthma and pollution illnesses to our children and elderly. Putting more pressure on our already collapsing health care professionals.

The water companies cannot cope providing the clean water and sewage we need, as it is. How are they going to cope with extra homes in this area. We have already seen, sewage being pumped into our rivers & seas, bottled water being handed out, as our drinking water is polluted.

Most importantly, our environment. This is our community, we have some stunning wildlife. We should be preserving our land and looking after it for future generations. Not digging it up and destroying it.

We are encouraging other countries to stop building, however doing it ourselves.

We are becoming an extension of London, before long, there will be a London underground station in Medway.

We need more trees, to prevent flooding and help with pollution. Eventually there will be no planet.

Please, please think of the local people. We do not need this destruction of our towns.

We are supposed to be the Garden of England, not a concrete jungle!

Regards

Joann Skinner

[REDACTED]  
[REDACTED] ME2 [REDACTED]

**From:** [representations, planning](#)  
**To:** [policy, planning](#)  
**Subject:** FW: Representation in response to Medway Council's Regulation 19 Pre-submission draft Local Plan  
**Date:** 28 July 2025 06:04:28

---

Hi  
For you regarding local plan  
Many Thanks

[REDACTED] /Medway Council  
Gun Wharf Dock Road Chatham Kent ME4 4TR 01634 333333



---

**From:** [REDACTED]  
**Sent:** 26 July 2025 12:36  
**To:** representations, planning <[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)>  
**Subject:** Representation in response to Medway Council's Regulation 19 Pre-submission draft Local Plan

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## **Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan**

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- Failure to Comply with Regulation 18 and 19 Requirements. The consultation

process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.

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The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable location) and maximise development allocations in the urban area (a more sustainable location). This is crucial in order to reduce impacts on the Hoo Peninsula's habitats and wildlife. Other comments:

The reason for purchasing a property in Hoo, was the attraction of being in a rural setting.

With the promise of additional supermarkets, doctors, dentists, road improvements to cope with the new houses already built.

This does not appear to be addressed by the council, and yet still more proposals to affect the people already here.

The roads are currently being repaired temporarily for severe pot holes and sunken drains only. A sign that the roads are insufficient for the traffic already, This peninsula is too small for the additional proposals and will only make this into a

town, with more pollution than it cannot deal with already.

As the increase of motorists is already effecting the air pollution. I refer to Medway Council Four Elms Air Quality Action Plan - 2022. It states “**Medway Council is committed to reducing the exposure of people in Medway to poor air quality in order to improve health**”. More houses will increase the traffic, 'cause more traffic congestion, and increase the damage to the environment.

This countryside has Grade 1 farmland, and the proposals for the future will have a vast impact on this and the sanctuary for our wildlife.

I hope this opposition will make the Council make the right decision to keep Hoo more rural than urban and adhere to their own commitment.

Kind regards,

Mrs Jacqueline Mark

[REDACTED]

[REDACTED]

[REDACTED]. ME3 [REDACTED]

**From:** [representations, planning](#)  
**To:** [policy, planning](#)  
**Subject:** FW: Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan  
**Date:** 28 July 2025 06:04:49

---

Hi  
For you regarding local plan  
Many Thanks

[REDACTED] /Medway Council  
Gun Wharf Dock Road Chatham Kent ME4 4TR 01634 333333



---

**From:** [REDACTED]  
**Sent:** 26 July 2025 12:42  
**To:** representations, planning <planning.representations@medway.gov.uk>  
**Subject:** Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan

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I hope this opposition will make the Council make the right decision to keep Hoo more rural than urban and adhere to their own commitment.

Kind regards,

William Mark

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ME3 [REDACTED]

26/07/2025

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Local Area Plan  
**Date:** 29 July 2025 08:55:46

---

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To whom it may concern,

In my previous email, I mentioned the regeneration of the high streets in Medway by removing old shops at the edges of the high streets and replacing them with housing. As a Labour run council, using the principles of Co-operative housing could provide a way forward.

<https://www.cch.coop/government-unveils-20-million-package-to-support-community-led-housing-initiatives/>

Kind regards,  
Rebecca Meade



From: [REDACTED]  
To: [policy planning](#)  
Subject: Medway planning for 25,000 new homes  
Date: 10 July 2025 11:23:54  
Attachments: [image0.png](#)

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This is absolutely disgusting

11:16



< [REDACTED] **Hempstead Village Community** [REDACTED] · 1h · [REDACTED] ...

The Medway Labour controlled administration, voted last month to approve a new Local Plan for Medway, setting out the level of new development across the region for the next 15 years.

The Plan proposes over 25,000 new homes, with Capstone Valley having to accept nearly 4,000. If this goes ahead, the only green space left in the area will be Capstone Country Park, as all the surrounding fields and open countryside will be lost.

With the Lidsing Garden Village to the south, within Maidstone Borough Council, over 6,000 homes and nearly 20,000 extra people will be living on the edge of Hempstead within the next 15 years. In our opinion this is over development that will forever change Hempstead and the surrounding villages.

The Local Plan does not address the vital infrastructure needed to accommodate such a scale of development or the impact on existing residents. We note that there is no proposed new money to ensure infrastructure first then housebuilding



Comment as Pa...



You are destroying all our open spaces, wildlife, clean air. Medway is full to the brim as it is.

Hempstead is already seeing a significant amount of traffic and that is without the Lidsing horrendous plan.

I'm totally disgusted that this is even being discussed. I honestly don't know what is going through your heads.

There are plenty of industrial space that is empty like in Gillingham business park that can accommodate more than a few house. Build on that, NOT on all our open spaces. This really is a joke and how we are meant to bring our Children up in this concrete jungle I don't know.

Enough is enough!!!!

Paula Quirk

Sent from my iPhone

## **Representation on Medway Local Plan 2041 (Reg19) June 2025**

I broadly welcome the production of the Local Plan (LP) to provide a basis for the development of Medway. However I am concerned at some of the changes in the latest document, and I am therefore writing to object to specific sections that I believe are not legally compliant, not sound or do not comply with Duty to Cooperate.

I have summarised the background in the main text, whilst stating my representations as separate bullet points.

### **Green Belt - Objection: Paras 3.1.9, 4.12.4, 4.12.8, 14.10.1, 14.10.5, Policy S7**

These sections refer to the re-classification of Green Belt and consequent release of land to the west of Strood.

The 2024 Medway Local Plan Reg 18 consultation noted public concerns over erosion of the Green Belt between Strood and Gravesham and stated that *'Medway's Green Belt provides a well-established buffer between settlements, making a significant contribution to the aims and purposes of the Green Belt'* (Para 4.12.10). Policy S7 emphasised this approach.

This was supported by preceding studies:

- 2018 Medway Green Belt Review Belt noted that Strood land parcels should be considered integrally and confirmed the contributions to be significant, recommending no change to Green Belt designation.
- 2020 Gravesham Stage 2 Green Belt Study noted that the adjacent area was of high value (fig 5a,b) and made a significant contribution to checking the unrestricted sprawl of large built-up areas (Table 4.1).

Latest NPPF guidance considers that Grey Belt land must be previously developed or play a minimal role in a) preventing urban sprawl, b) stopping neighbouring towns from merging and d) preserving the character of historic settlements.

In June 2025 a new Medway Green Belt Review was produced, with Medway Council (MC) regarding talks with Gravesham Borough Council (GBC) over possible development of adjacent Green Belt land as compromising Medway's Green Belt and presenting exceptional circumstances. This review was issued at the same time as the Local Plan.

The review divided two Strood parcels into six, and then assessed these to individually have a reduced effectiveness in reducing urban sprawl, or acting as strategic green buffers. Although the nature of this Grade 1 agricultural land has not changed since the 2018 review, in this new granular approach the impact of development on most parcels has been downgraded to only 'moderate' and the land to be Grey Belt and available for development.

The latest MC Local Plan has then used this approach to promote a cross-border development initiative with GBC, even though GBC would face difficulty justifying new development on this Green Belt land without Medway releasing its portion.

I am concerned that:

- The rationale MC has used in the 2025 Green Belt Review is both opaque and biased towards development rather than protection of Green Belt. Within this, a small contained parcel is valued as 'Strong' and Green, whilst large, open areas of green landscape are individually viewed as of only 'Moderate' value and therefore Grey – **LP not sound**
- The employed consultant's critique for the latest MC Green Belt review has not been released to assist in better understanding the sudden reversal of MCs position – **LP not sound**
- The Duty to Cooperate Statement in the evidence base mentions only the GBC Green Belt 2020 study, which regarded development in the area adjacent to Medway (TC2) as of high harm, and made no reference to developing this initiative. Insufficient evidence has been provided to allow the latest GBC position to be fully understood. – **LP not sound or legally compliant**
- The presumption by MC that GBC will successfully re-classify their Green Belt is premature - GBC has not yet published an updated Green Belt Review, or presented its latest Local Plan for public consultation and inspection. The absence of any supporting information from GBC on this development proposal does not allow a clear interpretation to be made – **LP not sound or legally compliant**
- The joint MC/GBC masterplan, also described in DtC Statement 4.5, has neither been made public nor provided in the evidence base, although the DtC document states that work has been concluded – **LP not sound or legally compliant**
- No evidence of relevant MC/GBC agreements has been provided to allow the nature of any linked cross-boundary initiatives to be adequately understood, and the unsigned 'initial proposed composite Statement of Common Ground' contains neither formal validation from Gravesham nor sufficient detail to assist – **LP not sound and does not comply with DtC requirements.**
- I consider re-classifying this Green Belt land as Grey is a flawed interpretation of NPPF guidance, and promoting the use of this land , together with the adjacent Gravesham Green Belt land, for building 4,000 houses is premature, unsound and prejudicial. It is also unsupported by relevant and proportionate evidence – **LP not sound or legally compliant**

Although for developers the re-classification to Grey Belt represents an exciting opportunity, for Strood residents it destroys much valued Green Belt environmental protection to create a very substantial increase in demand on an already overloaded local infrastructure.

#### **West Strood - Objection: Para 14.10.4-6, Policy SA6**

The text emphasises the proposed West Strood area as a transition to the countryside, but as important is the transition to town, and the impact on local roads, services and infrastructure external to the proposed development.

The construction of 4,000 dwellings close to Strood will result in an effective increase of 31% in people living in the local area (*4,000 houses, 2.4 occupancy, Strood N & S pop. 30,777 from 2021 census*).

With Gravesend 7 miles away and Rochester within only 2, most people would preferentially use facilities in the Medway towns, producing substantially increased demands on local roads into and through Strood. These are already overloaded, with significant congestion at peak traffic times and the A289 having major tailbacks on a daily basis. The relevant section of the Duty to Co-operate Statement mentions only that MC and GBC may consider M2 traffic modelling.

Also, although the LP promotes local regeneration of brownfield sites, the 'easy' option of developing West Strood features very early in the Plan (Yrs 1-5). This will encourage developers to preferentially build on the urban fringe and largely ignore brownfield sites, to the continued detriment of district centres.

Objections:

- No mention is made of the need for major upgrades to the local associated infrastructure (roads, water, sewerage etc.) to avoid degrading the 'green-blue' environment the Local Plan actively promotes. Although the use of S106 agreements for funding is mentioned, little clarity provided on the extent of these, apart from schooling. – **LP not sound**
- The severe impact of substantially Increased traffic movements into and through the towns from the new development has been ignored. – **LP not sound**
- Although local healthcare is already overstretched, the problems an extra c.10,000 people would create receive little attention. No mention is made of specific provision, merely a local centre including community use class E(e). This term is not sufficiently clear to emphasise or quantify appropriate healthcare provision – **LP not sound**
- Brownfield re-use should be actively encouraged by re-scheduling West Strood to a later stage. This would allow population projections to be confirmed, and road improvements and wastewater issues to be addressed before actual development is permitted. – **LP not sound**

#### **Strood District Centre - Objection: Para 8.10.4, Policies S20 and SA5**

Objections:

- The substantially increased demand from the proposed West Strood development on services and facilities in the district centre has been ignored. I am unable to identify how the detailed outputs from the Strood masterplan '*provide a very strong framework which can still be relied upon now as guidance*' – **LP not sound.**
- Strood is already 'dominated by traffic', and the West Strood development will result in a substantially greater volume that will not only want to access Strood but also to travel through to Rochester, Chatham and Gillingham. There is no mention of how to manage this, and to only describe improving public transport links does nothing to adequately address it. – **LP not sound.**

## General

Overall, I feel Medway Council has unnecessarily rushed production of the Local Plan, ignoring the concern over some of the major modifications that have been made to it. Not only does it rely on information not made available to the public for certain key decisions, but also little time has been allowed for the public to review the document.

I note that in 2021 Medway Council, as consultee, considered a 6-week review period insufficient *'for a such a complex and controversial Regulation 19 consultation'* from Maidstone Borough Council and requested 12 weeks instead (*ref: Council Leader letter 9-Dec-2021*).

To allow only 6 weeks for its own document seems perverse.

I have therefore only been able to focus my attention on aspects I consider of immediate concern.

I trust the representations I have made will be considered by the inspector in his review of the Local Plan.

Dr Michael McEvoy

## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Katherine"/>	<input type="text"/>
Last Name	<input type="text" value="Baird"/>	<input type="text"/>
Job Title	<input type="text" value="Internal Scrutiny in Education Sector"/>	<input type="text"/>
(where relevant)		
Organisation	<input type="text"/>	<input type="text"/>
(where relevant)		
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="ME2 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

(where relevant)

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Policy	Policy	Policies Map
	SA6 (Section 14.10, pages 266–272) Green Belt (Section 4.12, pages 60- 63)		SA6 (Section 14.10, pages 266–272) Green Belt (Section 4.12, pages 60- 63)	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

I have lived in Strood since birth (1971) and have sadly witnessed the gradual erosion of our Green Belt landscape over the decades. This ongoing reduction and increase to more housing developments has already contributed to serious and worsening local traffic congestion, particularly during peak periods. The Local Plan does not provide sufficient evidence of traffic impact analysis or modelling. Specifically, it fails to address the impact of the proposed housing developments in the Gravesham Borough within the neighbouring greenbelt farm estates. Lack of consideration to the current gridlock that frequently occurs when there are accidents on key connecting routes such as the A2, M20, and surrounding A roads.

The proposed access point from Beaufort Road, Clinton Avenue and Gravesend Road which adjoins the farmland where I currently reside, will directly funnel construction



and residential traffic into a residential area with roads already in disrepair. This would significantly and negatively affect quality of life and safety for existing residents. Furthermore, the Plan completely overlooks the compounding traffic and infrastructure impact that the upcoming Lower Thames Crossing project set to begin construction just outside Strood's boundary will have on the area.

The Plan also inadequately addresses the severe pressure on local healthcare services. Access to GP appointments is already extremely limited, and Medway Maritime Hospital the only major hospital serving the area is stretched far beyond capacity. I speak from personal experience: in September 2024, after a six-hour wait in A&E due to overcrowding and staff overwhelmed by frustrated patients, I was forced to sleep in a chair in a waiting room for over 24 hours in extreme pain while awaiting emergency gallbladder removal due to severe infection due to a lack of beds. This situation highlights the critical strain on local healthcare facilities and staff. Many residents' face difficulty securing timely, face-to-face GP appointments, raising genuine concerns that serious health conditions may go undiagnosed or untreated. Yet, the Local Plan presents no tangible or evidence-based strategy for expanding medical facilities, securing long-term funding, or recruiting the GPs and healthcare professionals necessary to serve the projected population increase

These failings point to a lack of soundness in the Plan, particularly in terms of infrastructure, healthcare provision, and the cumulative impact of development proposals

The plan inadequately addresses the increase in air and light pollution that will result from the proposed new housing. It overlooks the significant local wildlife in the farmland bordering Rede Court Road, London Road and Brompton Farm Road, a habitat recognised by Kent Wildlife Trust, which is at risk due to this development.

On a personal level, as I work from home, I am deeply concerned about the prolonged noise disruption that construction will cause over many years.

Furthermore, there is no clear or transparent budgetary evidence detailing how the necessary infrastructure improvements such as roads, healthcare, schools, utilities, and flood defences will be funded.

In terms of the Nolan principles for public decision-making, the Plan fails on several fronts:

- **Openness:** There is no clear justification or evidence for redesignating Green Belt land as 'grey belt,' nor transparency about the criteria used.
- **Selflessness:** The Plan appears to prioritise developers' interests over the needs and wellbeing of Strood residents and the surrounding community. Re-designating Greenbelt land to Grey-Belt makes it easier and more profitable for developers than using land designated as Brown belt
- **Objectivity:** Decisions seem rushed, lacking impartiality and robust evidence. Independent critiques of the Green Belt Review have not been published, and no meeting minutes from key discussions with neighbouring Gravesham Council are available, undermining transparency.

Overall, the Plan seems premature, lacking the comprehensive evidence and public accountability needed for a sustainable and fair local development strategy.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**1. Comprehensive Transport Assessment:**

A full, independent, and publicly available transport impact assessment must be conducted before any development is approved. This should include modelling of peak-time congestion, accident diversions, and the cumulative effect of nearby national infrastructure projects such as the Lower Thames Crossing. The assessment must also consider the impact on local access routes, which are already under strain.

**2. Healthcare Capacity Planning:**

The Plan must be supported by a detailed and costed strategy for expanding healthcare provision across Medway. This should include clear commitments on:

- The number of new GPs required
- Where new practices will be located
- How recruitment and retention will be supported
- Evidence of funding and timescales

Without this, the Plan fails to ensure basic service provision for the increased population.

**3. Green Belt Protection and Brownfield Priority:**

The Plan must revise its approach to Green Belt land by:

- Clearly defining and justifying the "exceptional circumstances" that warrant boundary changes, in line with the National Planning Policy Framework (NPPF)
- Providing evidence as to why brownfield alternatives were not prioritised first
- Publishing all supporting documentation that informed these decisions, including independent critiques and environmental reports

**4. Adherence to Nolan Principles:**

To rebuild public trust and ensure transparency, the Council must:

- Publish all missing minutes of inter-council meetings, especially with Gravesham
- Release the independent critique of the Green Belt Review
- Explain why Medway is progressing ahead of Gravesham despite regional cooperation obligations

5. **Biodiversity and Environmental Impact:**

Environmental assessments must be expanded to fully account for local wildlife habitats (such as the farmland behind Fountain Road, and Brompton Farm Road documented by Kent Wildlife Trust) and provide mitigation strategies to protect these ecosystems during and after development.

These changes are essential not only for legal and policy compliance but to ensure that development is responsible, sustainable, and places the needs of existing communities at its heart.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

Regulation 19 Consultation Submission.

Contributor: Mr W.McLennan

[REDACTED]

Date: 1<sup>st</sup> August 2025.

Submission pertains to: Draft Medway Local Plan 2041 (Regulation 19 July 2025)

Section 9.7 Aviation.

## **Policy T23: Aviation**

Rochester Airport will provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

To The Government Inspectorate.

Thank you for your time in reading and considering this submission which explores why Policy T23 is not legally compliant or complies with the duty to co-operate.

It is inappropriate and should be withdrawn from the Medway Local Plan.

The Draft Local Plan Policy T23 Contravenes:

NPPF Section 9 par 109(a);(c);(f) with specific weight towards not avoiding and mitigating adverse effects or supporting environment gains.

The adoption of T23 safeguarding the airport from closure without full public consultation and understanding of future financial liability to the public purse is counter to prudent fiscal responsibility and creating a popular place to live and work.

Government guidance on developing a Local Plan highlights “Effective use of Land” with the NPPF Policy 125(c) giving substantial weight to brownfield sites in decision making is not upheld.

Further the Land Compensation Act 1973 “Development and Compensation – Putting People First” (October 1972) Paragraph 3:

*“It is a conflict of right with right – the public’s undoubted right to have a new road or school or waterworks and the private person’s right to enjoy his home and garden, undisturbed.”*

To aid clarity and consistency within the document I have provided two descriptions for:

1. airport. - A General Aviation facility at Rochester, Kent with a single grass runway, operated by a private company since 2000, leased from Medway Council.
2. airfield. - Medway Council owned land of approximately 45 hectare (110 acre) Rochester, Kent.

The Policy promotes an act of not only continuing to invest tax payers' money into a dangerous operation but may result in a class action law suit under the "Land Compensation Act 1973" within the next year.

Medway Council and Rochester Airport Ltd were placed on record by Hugh James Law firm 16<sup>th</sup> January 2014 of the liability under the act. Medway Council confirmed the relevant date for completion of the airport works as 8 November 2021. A claim is currently under consideration.

No independent financial or accounting assessment has ever been undertaken by Medway Council to determine the ongoing business viability of aviation on a smaller foot print with a single runway despite the council receiving a 514 signed petition dated 25<sup>th</sup> July 2013 calling for one.

Today, Medway Council has no visibility of the airports continued financial viability whether by the incumbent operator or not. The effective use and value for money of the airfield land used for aviation against alternative development has not been quantified.

Medway Council deflects arguments about the airports poor value for money by referring to the return on investment from the recovered 13.05 hectares (32.5 acres) of land now assigned to the Innovation Park. This implies cross subsidy to aid a private company to ensure aviation continuity at the site.

Government guidance on developing a Local Plan highlights "Effective use of Land" with Policy 125(c) (substantial weight to brownfield sites in decision making).

There is no recent public mandate for the retention of the airport.

Rochester airport originally had 4 runways but over the years the airfield land has been removed by successive Council's for an Industrial Estate and latterly the 1980's a retail park. This reduced the airport facility to approximately 45 hectare (110 acres) with two runways.

The last public consultation by Medway Council on the future of the airport was well over ten years ago. The only option presented was the retention of an operational airport on a reduced footprint alongside a "Technology Park" latterly named Innovation Park Medway (IPM).

To release the land for the Innovation Park it would require the removal of one of the remaining two runways.

The Rochester Airport Masterplan (Phase 1) public consultation by Medway Council was spearheaded by a 7,300 leaflet campaign promising noise reduction and improved safety for residents. All of which today can be proved false.

Despite overwhelming opposition to the plan by local residents in petitions and feedback the Council continued to press forward rather than looking at more effective use for the entire airfield.

The 2013 consultation was prior to giving the incumbent airport operator a 25 year lease on the facility despite them allowing the site to fall into disrepair over the preceding 14 years of their stewardship.

Thirteen years prior to the Rochester Airport Masterplan the former Labour Council commissioned W.S. Atkins to produce the “Rochester Airport Review.”

The comprehensive W.S. Atkins report provided a balanced and effective perspective on the future use of the airfield.

The report gave 4 options for the use of the land; two retained an operational airport and two without. The author concluded at 6.136:

*“ The continued existence of a small airfield facility at Rochester may be seen as a beneficial business resource for the area, but whilst its activities are confined to local flying activities, this as a single use in isolation would be a sub-optimal use for such a strategic land asset in economic development terms.”*

The W S Atkins review on the airfield offered a better perspective on value for money. It stated that a mixed use for the land which could include retail, housing, technology park and public space be consider.

The report highlights that Rochester Airport Limited (formerly Rochester Airport plc) refused access to the site or any participation in the review process.

It highlighted that the use of brownfield site such as Rochester Airfield promoted urban renaissance needed to prevent countryside housing sprawl and outward commuting.

The report detailed a small area for 220 houses within the mixed use of the airfield.

The report also suggested that the retention of an operational airfield immediately adjacent to a high value technology and business park would negatively influence the attractiveness to investment and value of any recovered land.

While it is easy to determine the monetary loss in rental terms of retaining the airport against the value of the occupied land itself (discussed latter in this submission) the consequential or hidden loss in land value in respect of the Innovation Park may be millions of pounds.

Section 9.7 Aviation. Para 9.7.1 States:

*“Rochester Airport is a general aviation facility catering for leisure, business, training, heritage and emergency service uses. A small part of the site itself falls partly within the Tonbridge and Malling administrative area.”*

For clarity there is no “safeguarding” for the airport within the adopted 2003 Medway Local Plan or in the Tonbridge and Malling Council Local Plan. Nor does the airport have any English heritage status protection.

The former CEO of the Kent Surrey and Sussex Air Ambulance Service (KSSAAS) who use the airport as forward base states in his letter dated 23 March 2017:

*“We currently operate perfectly satisfactorily and safely at Rochester with both runways in existence, that would not change if only one runway was to remain, or indeed no runways at all.”*

The KSSAAS between 1999 and 2018 operated from an Industrial Park, Marden, Kent.

The KSSAAS presence at the airport it is not predicated on the continuation of flying at the site. Their primary fuelling and maintenance is at Redhill Aerodrome.

Medway Aeronautical Preservation Society (MAPS) does not need an operational airport to undertake its restoration work which is facilitated by aviation enthusiasts and volunteers. It does not contribute to jobs creation.

Section 9.7 Aviation. Para 9.7.2 States:

*“Adjacent to and on either side of the airport is the Innovation Park Medway. The Council approved the Innovation Park Medway Masterplan in March 2019, subject to comment from National Highways. The masterplan provides the vision and guidance for the consideration of development proposals, while a LDO and supporting Design Code sets out what development is permitted and the associated conditions.”*



The Medway Local Development Order is about the Innovation Park Medway (MIP) on recovered airfield land. The success or failure of the development is not predicated on continuation of flying at the airport.

As suggested in the W.S. Atkins airport review 25 years earlier. The value and attractiveness of the building plots will be severely compromised by an operational runway less than 100 metres parallel to its easterly boundary with no noise protection or mitigation from microlights, helicopters and full throttle aircraft taking off or landing.

No company today wishes to expose employees to unhealthy environments which can lead to injury compensation claims.

Section 9.7 Aviation. Para 9.7.3 States:

*“The Innovation Park Medway sites benefit from Enterprise Zone status enabling the creation of skilled employment opportunities. There are no plans to transform the airport facility into a commercial airport, with regular scheduled and/or chartered passenger flights, and the operations will be subject to conditions to mitigate and manage the impacts.”*

The Innovation Park Medway is not an aviation facility. Any overlap of Enterprise status awarded to the airport new facilities has almost if not expired already and will not extend to the end of this Local plan.

It is well documented that the Airport operator wants to build a successful aviation enterprise. Their aspiration include scheduled flights by aircraft and helicopters with the capability already within their 2014 Airport lease and planning approval.

Medway Council cannot interfere with the Airport commercial business decisions. The statement, “There are no plans to transform the airport facility into a commercial airport” has no legal weight.

The Council has no ability to mitigate and manage impact, substantiated by the lack of operational criteria within the Policy statement.

How the Council will be able to mitigate and manage the impacts is not explained. Yet Policy T22: Marinas and moorings details clearly criteria which would be applied to river front developments.

Policy T23 bestows on the airport operator unlimited and unencumbered business scope without regard to the environment or residents. Medway Council will be powerless to control the situation.

Section 9.7 Aviation. Para 9.7.4 States:

*“Under the policy theme of sustainable transport and specifically in relation to general aviation airfields, the government requires a Local Plan to recognise the importance of maintaining a national network of general aviation airfields and their need to adapt and change over time, taking into account their economic value in serving business, leisure, training and emergency service needs.”*

There is a government aspiration to retain some General Aviation airports. However, Rochester Airport is not listed or cited in the GA white paper as a strategic airport.

The General Aviation Handbook by the Department of Transport encourages the retention of GA Airports but does not preclude or protect them from closure. It states:

*“Our planning system must meet the needs for new housing and commercial development, in the process creating places that are desirable to live and work, whilst ensuring negative impacts on existing communities and the environment are limited.”*

The T23 Policy contravenes NPPF Section 9 par 109(a);(c);(f) with specific weight towards not avoiding and mitigating adverse effects or net environmental gains.

It is extremely rare that the Secretary of State for Communities and Local Government issues a directive for an Environmental Impact Assessment to a Planning Authority (May 2016).

The act itself is a demonstrable marker that Medway Planning Authority officers were not adhering to the regulations possibly to expedite the airport planning application in which their employer has a profit sharing agreement.

Ensuring no negative impact to existing communities when removing a runway and concentrating all flights in and out over the same area (effective 40% + increase), not capping flights or aviation types, prohibiting them at Bank Holidays or Sundays and extending commercial hours of operation beyond historically enjoyment does nothing to mitigated impact and certainly not in sympathy with the Governments Policy in supporting aviation.

Whilst the Government under the policy theme of sustainable transport in relation to GA Airports encourages Local Plans to recognise the importance of maintaining a national network it does not support increasing risk to the public or critical infrastructure.

Air crash statistics can be manipulated and interpreted differently according to desired results especially when a safety report is compiled by a pilot who by nature will not be risk averse.

Rather than relying on mathematical computation for GA incidents likelihood, common sense is sometimes a better solution.

It is incomprehensible why officers and councillors thought it a good idea to reduce the airport to a single runway concentrating all flights in and out directly across an the eight lane wide M2 motorway and High speed rail link, less than 180 metres from the runway end.

As stated by Medway Council the airport caters for leisure flying which is perhaps the most dangerous of all GA types.

As an example Air Accident Investigation Branch Bulletin: 3/2025 details a recent incident at Rochester Airport, 24th August 2024 around midday by a 79 year old pilot flying a Piper PA-28-181.

On landing the pilot missed the runway, shot across the busy B2097 and crashed down the steep embankment stopping a handful of metres from the busy east bound carriage of the M2 motorway. Both of the aircraft's wings had struck trees, and had detached from the fuselage which resulted in a fuel leak.

It is acknowledged by the CAA that the most dangerous point of a flight is at takeoff and landing. The death toll and carnage that may ensue if an aircraft crashes on the M2 motorway or HS rail link and hit by multiple vehicles or a train would be horrific.

The death toll would possibly exceed the Grenfell disaster and Medway Council endorse the continuation of risk by approving the concentration of all flights in and out of Rochester Airport onto a single runway. Policy T23 seeks to safeguard and promote the continuation of unimaginable and significant risk.

In the opposite direction equally at threat are residential houses of a large conurbation starting 270 metres from the runway.

Section 9.7 Aviation. Para 9.7.5 States:

*"There is a small aviation operation at Stoke on the Hoo Peninsula. The Stoke facility, which primarily caters for microlights, is limited in scale and constrained by high voltage power lines and other features. It is not proposed to safeguard this facility."*

Possibly the only accompanying statement for T23 which is valid and appropriate. However, by stating that the Medway Council Local Plan does not intend to "safeguard" Stoke Aerodrome by association it is inferring that Rochester Airport is to be "safeguarded" unencumbered.

Medway Council does not have an aviation policy it simply acquiesces to a Limited Liability business aspiration, without understanding its liabilities or protecting its residents.

Actions by the former Medway Council leadership and by the appearance of Policy T23 seeking to “safeguard” Rochester Airport may speculatively suggest a continuation of influence by the airport operator to the detriment of residents, public finances and safety.

As stated earlier Rochester Airport is operated by a private limited liability company whose business site and expansion will be protected and supported by Policy T23.

Should the incumbent operator become insolvent or bankrupt adoption of Policy T23 will limit the current or future Council’s effective use of land and development options.

The Council would have to re advertise the site as an “Airport to Let” offering further monetary incentives or lower site fees. This situation may even give rise to the incumbent leveraging Medway Council for financial help should its business model fail confident that the site is protected for aviation.

The £4 million contribution by Medway for improvements to the airport within the 2012 Informal Tender stated that a condition of letting was that 16/34 runway land would be taken for development reducing the airport to a single runway.

The South East Local Enterprise Partnership (SELEP) round 2, “Technical evaluation” of the Medway Council revised Airport business case stated it represented “Poor value.”

The revised Medway Council SELEP Business case asked for a reduction in works from the original award of £4.3 million because of escalating costs. This acts contrary to Medway Council Chief Financial Officer guaranteeing in a letter dated 16<sup>th</sup> May 2016, attached to the original SELEP submission which states:

*“If there are any cost overruns, these will be met by Rochester Airport Limited from its own resources.”*

Rather than enforce the original terms and conditions by way of a contribution from Rochester Airport limited for the shortfall. Medway Council secured a reduction in works and retained the original £4.3 million award.

The reduction in works removed the purported safety and noise mitigation measures for the airport.

Medway Council SELEP 2016 Business case omitted to state that the award of a 25 year Airport lease to a limited liability company in 2014 and 2012 “Airport to Let” tender offered a £4 million contribution towards improvements to the facility.

Medway Council by not enforcing the shortfall in costs on the airport operator raises the spectre of whether Medway Council undertook the correct financial due diligence at award of contract which would have revealed the level of solvency of the company.

There was only one tender response, that of the incumbent. This raises the question of the airports long term viability with a single runway. The absence of other potential bidders suggests it is not viable.

Medway Council did not disclose in its SELEP business case for the award of £4.3 million that they had already defrayed costs on the project and that the Council had the funding already ring fenced in their capital account.

The Council laboured the fact that without the award the airport would close (do nothing scenario) when it already had the money to save it.

A year on year review of the Airport operators simplified accounts at Companies House shows since the relevant date of the £4.3 million works completion the company is not profitable.

The Airport lease states a rent payable currently to Medway Council of £30,000 +VAT pa. Plus 10% of company gross turn over + VAT. Additionally payable above the rent the Council is to receive 75% + VAT of any income from any sub-letting which exceeds £50,000 pa.

Today airport itself occupies approximately 31.05 hectares (76.73 Acres) of valuable brownfield land.

Advice given to Medway Council by a leading commercial real estate agent in 2016 and used in the SELEP £4.3 million Business Case states the airfield land would be valued between £1.24 and £1.36 million per Hectare. The valuation for housing would be significantly higher.

Using the lower commercial valuation the airport itself is sitting on a public asset of well in excess of £38m or more. Today the value for housing would be well in excess of £76m.

The annual return on investment of £90,000 or less for a potential asset value of £76m does not represent effective use of land or value for money. Nor a good return for the SELEP £4.3m infrastructure investment spent on the airport.

The SELEP business case for the £4.3m award states that the Airport improvements would increase employment on the site. The accounts show for the airport operator itself in 2024 employed an average of 13 full/part time people including management. The number of full/part time employees in 2008 was 12.

Medway Council has spent hundreds of thousands of pounds of tax payers' money on specialist consultants, and legal fees defending the airport operators planning submissions which have been subject to a High Court Judicial Review (lost by Medway Council) and Secretary of State for Communities and Local Government EIA Call in directive dated 26 May 2016.

The Medway Council opposition leader expressed his view at both full Council and at the South East Local Enterprise Partnership meetings that the £4 million investment into the Airfield facility was wasteful without any possibility of a return.

**In conclusion:**

Medway Council's past actions in funding the airport can hardly be described as "Effective land use." especially when it has already cost the tax payer millions of pounds.

Medway Council should stop throwing good money after bad in respect of the airport and focus on effective use of the land which not only returns value for money to the public purse but reduces its financial liability arising from any major incidents associated with the facility.

The continuation of flying at Rochester Airport on a reduced footprint not only exposes Medway Council officers and former councillors to untold liabilities and possible criminal charges but the endorsement of T23 by the new Labour Council may implicate them also.

Policy T23 should be considered inappropriate and removed from the Medway Local Plan 2041. The Policy should be replaced with a statement which does not guarantee continuation of aviation at the site or its uncontrollable operation.

The Policy should include a future pathway to more effective and safe land use options through public consultation unencumbered by present or past usage.

I would like to thank you for your consideration and time in this complex and dangerous matter.

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** GOOD AFTERNOON  
**Date:** 01 August 2025 17:17:15

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GOOD AFTERNOON. THERE HAS TO BE MORE INFRASTRUCTURE PLANNING SUCH AS DOCTORS EXTRA HOSPITAL FACILITIES SUCH AS DOCTORS OPEN AT WEEKENDS FUNDED SOMEWHAT BY PRIVATE PATIENTS USING THE FACILITIES AT PLACES SUCH AS RAINHAM HEALTHY LIVING CENTRE USING VACANT ROOMS AND AT WEEKENDS WHEN THE DOCTORS ARE NOT THERE. KIND REGARDS CARL DUNKS

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Re: Acknowledgement of Regulation 19 Response  
**Date:** 04 August 2025 09:52:42

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I POLITLEY OBJECT TO THE PLAN FOR HOUSES ON THE PUMP LANE SITE AS I BELIEVE THE SITE FALLS WITHIN A 3KM BUFFER ZONE WITH THE MARITIME CONSERVATION ZONE OF THE MEDWAY ESTUARY.  
KIND REGARDS CARL DUNKS

---

**From:** policy, planning <planning.policy@medway.gov.uk>  
**Sent:** Monday, August 4, 2025 9:43 AM  
**Subject:** Acknowledgement of Regulation 19 Response

Thank you for your response to the Regulation 19 consultation on the Local Plan. This has been recorded as part of the formal responses to the consultation. Your comments will be published and shared with the Planning Inspector who will lead the examination of the Medway Local Plan.

We appreciate your engagement in this important stage of the plan-making process. The next stage will be the independent examination of the Local Plan. The examination will consider if the proposed plan meets tests of legal compliance and soundness.

To help the Inspector in reviewing the representations, your response should indicate whether you **support** or **object** to the Local Plan.

If you are objecting, your response should indicate if you have views that:

- The Plan is not legally compliant
- The Plan is not sound
- The Plan does not comply with the Duty to Cooperate

Further guidance is attached.

To assist the Planning Inspector and the council in processing your response, you may also choose to submit your representation having reference to the attached **Planning Inspectorate representation template**. While this is not a mandatory form, using the template will help ensure your comments are clearly structured and easier for the Inspector to assess.

If you wish to make any additional comments/clarifications based on a review of the form, please reply to us by 11 August. However, please be reassured that your comments have been recorded and will be part of the formal record published and shared with the Planning Inspector.

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#### **Use of your personal data**

If you have written to us previously consenting for us to use your contact details as part of our Local Plan database, there is nothing further you need to do.

**If you haven't**, please do indicate if you **consent** to us holding your personal details to enable us to contact you for further Local Plan consultations and updates.

Please note that a copy of your representation (comments) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). Your representation will be 'made available' in line with the legal requirements. These are in The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35. This includes publication on Medway Council's website. This will include the names of people who made representations on the plan.

Information gathered during the process of consultation leading to the adoption of the Local Plan will be



retained for as long as is necessary, in line with the Council's data protection policy.

Full details of the privacy statement are available here:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

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**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** GOOD MORNING  
**Date:** 08 August 2025 10:05:51

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GOOD MORNING. I BELIEVE THAT THERE IS A MARITIME CONSERVATION ZONE  
WHERE THE PUMP LANE DEVELOPMENT IS. KIND REGARDS CARL DUNKS

**From:** [Charlie Chester](#)  
**To:** [policy, planning](#)  
**Subject:** Local Plan  
**Date:** 01 August 2025 19:31:18

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Dear Sir,

Having read most of your attempt at a local plan it would seem more suited to be titled More Grimms Fairy tales. There is not a thread of common sense in it :-

Where is the new infrastructure to absorb all this new housing etc ?

A lot of contravenes the Neighbourhood Plan from Hoo St Werburgh and Chattenden Parish which must be adhered to as it is now a legal document, which you are well aware of but obviously chose to ignore.

This attempt at a Local Plan must be scrapped and a proper one drawn up - if you can't do it let someone else have a go - it can only have to be better !

A Medway Resident for over 75 years

**From:** [Charlie Chester](#)  
**To:** [policy, planning](#)  
**Subject:** Re: Acknowledgement of Regulation 19 Response  
**Date:** 05 August 2025 21:31:19

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Dear Sir,

Having read the proposed Local Plan it is obviously :-

Not legally compliant (check HSW&C Neighbourhood Plan)

Not sound - for above reason

Does not comply with the Duty to Cooperate - for above reason.

Please make the effort to re-write it taking the HSW&C Neighbourhood Plan into consideration.

C.Chester

On Mon, Aug 4, 2025 at 9:46 AM policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)> wrote:

Thank you for your response to the Regulation 19 consultation on the Local Plan. This has been recorded as part of the formal responses to the consultation. Your comments will be published and shared with the Planning Inspector who will lead the examination of the Medway Local Plan.

We appreciate your engagement in this important stage of the plan-making process. The next stage will be the independent examination of the Local Plan. The examination will consider if the proposed plan meets tests of legal compliance and soundness.

To help the Inspector in reviewing the representations, your response should indicate whether you **support** or **object** to the Local Plan.

If you are objecting, your response should indicate if you have views that:

- The Plan is not legally compliant
- The Plan is not sound
- The Plan does not comply with the Duty to Cooperate

Further guidance is attached.

To assist the Planning Inspector and the council in processing your response, you may also choose to submit your representation having reference to the attached **Planning Inspectorate representation template**. While this is not a mandatory form, using the template will help ensure your comments are clearly structured and easier for the Inspector to assess.

If you wish to make any additional comments/clarifications based on a review of the form, please reply to us by 11 August. However, please be reassured that your comments have been recorded and will be part of the formal record published and shared with the Planning Inspector.

---

#### **Use of your personal data**

If you have written to us previously consenting for us to use your contact details as part of our Local Plan database, there is nothing further you need to do.

**If you haven't**, please do indicate if you **consent** to us holding your personal details to enable us to contact you for further Local Plan consultations and updates.

Please note that a copy of your representation (comments) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). Your representation will be 'made available' in line with the legal requirements. These are in The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35. This includes publication on Medway Council's website. This will include the names of people who made representations on the plan.

Information gathered during the process of consultation leading to the adoption of the Local Plan will be retained for as long as is necessary, in line with the Council's data protection policy.

Full details of the privacy statement are available here:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

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Please be aware that emails sent to or received from Medway Council may be subject to recording and/or monitoring in accordance with relevant legislation.

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Strood North development  
**Date:** 02 August 2025 08:55:34

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- >
- > Morning
- >
- > I would like to express my concern over the above mentioned development site.
- >
- > Firstly I cannot understand why Gravesend and Strood council decided to reclassify green belt land as grey belt land, I have not seen any evidence base for this reclassification. I can't see why they didn't look at using brownfield sites first.
- >
- > Having recently moved to the local area from Higham and not having been aware of this possible development. I'm deeply concerned how it will affect the local area and current residents.
- > We
- > I didn't see any plans to build a new hospital in the area. My father who is local had a recent visit to the hospital and the doctor stated that he would like to keep him overnight for observation however there are no beds for him, he told me there were people on beds in the corridors due to overcrowding.
- >
- > Having young children myself I am concerned that this huge development will have a large impact on the local residents health through poor air quality and continued construction, when we are all supposed to be trying to make a more green environment for ourselves and others.
- >
- > I currently have to leave my house at 5.30am to drive to work, if I don't the A2 is very much congested and I would be late for work, the A2 is always congested on the way home also. I didn't see any plans to improve the road infrastructure which should be completed prior to any housing development.
- >
- > Class number in schools are the highest in a decade and one new school will not cater for the increasing population plus new population in the area.
- >
- > Higham surgery is closing and I'm not aware of any new ones opening, how can they propose to increase the amount of houses without first increasing amenities that are more important.
- >
- > Crime numbers have risen in Medway towns and increasing the amount of houses will only make this worse.
- >
- > There are also over 20,000 derelict homes in Kent alone, Gravesend Hospital has been empty for years, why are these areas not being considered before green belt land.
- >
- > Not to mention the wildlife you will be destroying and pollution you will be causing if these plans go ahead.
  
- > Joe Fallarino

ME8

Ref: Medway Local Plan 2041

Date: 02 August 2025

Dear Planning Inspector,

We wish to raise the following points and objections to the proposed Lower Rainham - Suburban development off Pump Lane in Rainham Kent ME87TJ. These comprise:

1. Adverse traffic impacts.
2. Loss of good agricultural land.
3. Further strain on the sewage & water treatment for the area.
4. Additional strain on local health & education provision.
5. Degradation to the local environment / SPA's & SSSI's.
6. Building design and estate layout.
7. Delivery and penalties

1. Adverse traffic impacts.

We are concerned about the adverse impact of the Lower Rainham development on the traffic along the Lower Rainham Road (B2004).

This road currently suffers from appreciable congestion at peak times. There are four pinch points in the proximity to the proposed development. The addition of approximately 750 homes, plus amenities essentially in the middle of this congestion 'hot-spot' would be extremely ill-advised, illogical and exacerbate an already bad situation for motorists & cyclists.

As the local Council Planning Officer has stated that there are no plans to improve / widen the Lower Rainham Road by this stretch it will guarantee long queues of traffic and probable grid lock. There is also no plan to remove the poorly sighted pinch point between the road leading to Motney Hill and Berengrave Lane.

It is to be hoped Emergency vehicles will not need to use this route too often.

With regard to the points of access / egress for Pump Lane, we believe the plans to add a passing place or two to the southern end of the lane and a one-way system at the junction with the Lower Rainham Road will not result in a free flow of traffic for the proposed development of the said 750 homes and amenities. The placement of traffic lights on Pump Lane by the rail bridge, while necessary, will again add to the overall congestion.

From the number of proposed residences in this application it would seem logical to suggest the increased traffic would also adversely affect the major road junctions in the area. The impact from this development together with the number of builds currently in progress will add up to a significant level to take into consideration. The Developers and Planning Officer's stance that improvement to the junctions and roundabouts close to the proposed development will be sufficient to deal with the traffic density on the Lower Rainham Road would seem to be optimistic to say the least. I would be interested in learning how their proposal will solve the issue.

2. Loss of good agricultural land.

Good agricultural land is of vital importance and is becoming increasing so. The structure & complex bio-diversity of the soil is not something that should be conveniently dismissed as collateral damage, or a necessary evil. Further it cannot simply be quickly replaced at some later date. To do so, as we feel, is decidedly irresponsible and short-sighted. It is too valuable and limited a resource in this small country with increasing demands being made upon it.

The land in question has been classified and proven to consist of Grade 1 and 2 soils, namely very good and good. We have noticed there has been a good crop of fruit in previous years; having taken some photographs for posterity. These observations have been confirmed by an experienced fruit farmer. We also recall a substantial number of fruit trees being planted in this orchard in the recent past.

There is a long history of fruit farming in this area and its ability to successfully do so does not appear to have taken a downturn.

We would like to know why this particular site was chosen, who proposed this site and why a brown field site(s) was not selected instead. Particularly as brown field sites are claimed to take priority with regards to new developments.

3. Further strain on the sewage and water treatment for the area.

This development will further increase the strain being placed upon Southern Water to fully treat the sewerage produced in the area. Southern Water are already experiencing problems and issues in this matter as noted by OFWAT and the Environment Agency.

There is also the issue of supplying & continuing to reliably supply sufficient quantities of good quality drinking water – and at an acceptable pressure. Changes to the climate are forecasting the increased risk of droughts, particularly in South East England. It has now been noted that this area has been classed as “water stressed”. Which rather begs the question ‘How is this issue going to be dealt with? Now, not 2035 or 2040.

Experience in recent years has shown the levels in the relevant reservoirs and aquifers have dropped significantly in the summer months to a worrying degree.

At the other end of the spectrum is the local flooding aspect. Climate modellers have predicted increased strength storms for the future to accompany the periods of drought.

Whether the local flood plain map, updated in 2024, will account for future rises in sea level and the increased likelihood of heavy downpours remains to be seen.

One question that was not answered during the consultations we went to is, “are there plans to install multiple pumping systems (one acting as back-up), for the Lower Rainham development?” It should be recalled that the extent of the flooding in 1953 did reach the Lower Rainham Road, and sea levels have risen since then. Surely there will be some ‘future proofing’ involved in this scheme?

4. Additional strain on local health & education provision.

At present there are problems finding a G.P. or dentist. A development of this size will only worsen the situation. The local Accident and Emergency department at Medway Maritime are frequently struggling to cope with demand and already have to deal with a large population density.



A successful application will lead to further demands on the local education system. As it is class sizes are currently too large. We note there is provision in this proposal for a *potential* site for a Secondary school to be built. It again should be noted similar proposals have often failed to deliver on promised amenities. It also begs the question as to how long the Local Education Authority will be able to cover the upkeep and staffing of this school and what would then become of an empty building should funding fail. Similarly, funding, staffing and running costs for the other amenities

5. Degradation to the local environment / SPA's & SSSI's.

There are SPA's and SSSI's close by to the proposed site. The Medway marshes and estuary contain protected habitat and some protected species of wildlife. The additional recreational usage from a development of this size and the proximity to these marshes is likely to have a detrimental effect on the above. We have seen for ourselves the increased disturbance resulting from the recreational activities there.

6. Building design and estate layout

Are the designs for the 750 homes and amenities going to use the more modern insulative building materials that will require minimal heating during the cooler months, yet prevent most of the summer heat from penetrating to the interior of the buildings? Or, are the designs simply going to opt for standard brickwork with, as yet, an unspecified thickness of wall insulation. It is hoped the loft insulation will be to the highest standard to conserve energy.

Why are there currently no plans to install solar panels to those homes that would be suitably orientated, yet there are proposals to fit charging point(s) for EV's?

Current building regulation aside, it seems counter-intuitive, frankly irresponsible and certainly not forward thinking to proceed without fitting these panels.

I was told by one of the Developers representatives that there are no plans to fit said panel because of the "pollution caused by their manufacture". I reserve comment.

Will triple glazed windows be fitted to all of the homes?

Cost factors will undoubtedly be raised by the developer, but I recall similar arguments regarding the fitting of double glazed units in the past. Perhaps endeavour be ahead of the game for a change.

It is hoped the emphasis will be on building only one, two and three bedroom homes, rather than the 'Executive' variety. Parking for a minimum of two cars per household should be provided.

7. Delivery and penalties.

Are there plans to add penalties for late completion or failure to build the proposed Health facilities, Nursey, Community services, Care home and Retail units etc? If not, why not. There have been too many instances where some developers have reneged on plans and promises to build various amenities.

Yours faithfully,

Andrew & Ann Collins

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Green Spaces  
**Date:** 02 August 2025 19:23:11

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I am writing to oppose the proposed building works on the Rainham orchards and Capstone Valley . If you had any idea how gridlocked these areas are you would oppose yourselves . Come and sit in the traffic during rush hour or school time . Have you tried to go to A&E and waited in a corridor for 72 hours ? How long do you have to wait to get an e consult with your doctor ? 3 weeks . Get a dentist ?

Look after the people that are currently paying their council tax for services instead of ignoring us .

Theresa Elsey [REDACTED] ME8 [REDACTED]

Sent from my iPhone

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Cc:** [REDACTED]  
**Subject:** Medway Local Plan - Strood North's Greenbelt - public consultation  
**Date:** 04 August 2025 15:16:55

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Medway Planners,

It is with horror I have just read Medway Council Planning Proposal to build housing on green belt land in Strood North and in particular to the 'Proposed Development' of 'Greenbelt' land namely, land north of Rede Court Road and Brompton Farm Road.

The proposal for North Strood will undoubtedly effect the adjoining hamlets of Wainscott, Cliffe, Cliffe Woods, High Halstow, Chattenden these areas have already been saturated with housing developments without any attempts to consider the long-term detriment to these areas.

Allow me to remind you, the A289 bypass was built to take traffic OFF the roads such as Rede Court Road and Brompton Farm Road, to provide a healthier environment for the poor residence along these roads and surrounding community; Medway Councils proposal will ultimately put more traffic back on these roads. It is inconceivable how the council has not considered the effects to health of those living along these routes.

We don't have the infrastructure to cope with yet more housing, not forgetting of course you the honourable councillors of Medway are currently have a ridiculous proposal for Green Field land off Lower Rochester Road, circa 400 homes I believe. Where are the plans to increase Doctors surgeries (just in case it's escaped your notice, there is a proposal to CLOSE the Higham surgery this summer!) Where's the mains water coming from? No new reservoir same goes for Gas & Electricity supplies.

Why does Medway and especially this area of North Kent need yet more housing? If it does then allow me to point out there is two very large Brown Field sites in Strood that have been left Barron for several years, one directly sandwiched between Strood Station and the river the other being the land of Medway Councils former offices; why aren't these being developed.

Meeting housing targets set by our newly elected government must be balanced with a factual need. Any development proposal must have a Section 106 (S106) agreement that mitigates any such impact and protects the local community and infrastructure; it's not about what the council getting their hands on the Section 278 (S278) money from developers; it must be a balanced decision based on what is good for the area and the current community.

I fully object to the entire proposal, it is immoral of the collective Medway Councillors to simply allow the destruction of green fields (and don't insult the intelligence of the residents by renaming the land 'Grey Field') The labour government may aspire to build new homes, but that commitment should look at Brown Field sites only.

Yours Sincerely,

Mr Paul Davies.

**From:** [Graham Page](#)  
**To:** [policy, planning](#)  
**Subject:** Medway new local plan consultation  
**Date:** 04 August 2025 17:15:31

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Hi, regarding the local plan all i would like add is we MUST have expansion of local infrastructure of roads, hospital beds/staff, doctors surgeries, emergency services, and possibly even new supermarket food stores to cope every time the council sign off new house building. These things should mandatory to any house building approval but clearly haven't !

I would also like to see new houses being built which are targeted to be affordable for younger generations and people on average wages, [REDACTED]  
[REDACTED]

Thanks.  
Graham.

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan 2041 Regulation 19  
**Date:** 04 August 2025 19:57:42

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Attn Planning service

I logged onto the council website but was unable to download the forms for making an objection

With regard to the above, we understand the need for houses in the Medway area but my objection is to the vast amount of housing proposed to be built in an area where the existing infrastructure is already struggling to cope with the needs of the existing residents. I also object to the fact that working agricultural land that benefits us all can suddenly overnight be regarded as "grey belt" in only one meeting and when talking to a representative at the meeting at the church in Strood, was told using brown belt land first was not an option as it was too expensive and regarding asking questions about proposed extra infrastructure to accommodate the increase in population and traffic that this was "chicken before the egg" and nothing would be done until the houses are built. There was no reassurance or consideration given on the impact on existing residents having to endure the upheaval of the construction of all these houses being built around us all. Its total saturation of the area. It does not seem fair that so much of our original green belt space is being taken over in Strood for more development.

We live on Brompton Farm Road and the traffic is getting much worse. Drivers speed between the two sets of speed cameras constantly and if there is any problem on the bi pass it gets grid locked, more traffic would have a big impact on safety. The pollution level will surely increase though lack of green belt and big increase in road traffic. As to one of the proposed access roads for the proposed new houses, at the small roundabout by Cliffe Road it is very dangerous during school times as long queues form by parents and minivans dropping off children at the school plus there are cars parked either side of the road.

With regard to health and welfare it is very hard to get an appointment at our present GP practice often having to wait days or weeks to be seen and the surgery at Higham is on the brink of closure so if Gravesham are building in that area it will not have a surgery at all and will need to use Strood facilities which is overstretched just as Medway Hospital is with ever growing population, another grave concern.

We hope these concerns will be acknowledged. The whole concept is very worrying for us and at the moment we do not see a bright future for Strood at all if all these plans go ahead.

regards

Alf and Sharon Wightwick  
[REDACTED]

## **1. General Position**

I've lived in Strood for most of my life, and I care deeply about this town and the wider Medway area. I've seen the area evolve over the years sometimes for the better, sometimes not and I recognise the importance of having a Local Plan that sets out a clear and sustainable path for our future. I support the idea that Medway must plan responsibly for housing, infrastructure, and environmental needs.

However, as someone who knows Strood intimately, I believe the proposed site allocations in Strood North particularly parcels SNF1, SNF2, SNF3 and SNF4 are not in the best interests of this community. These plans would fundamentally reshape a part of Medway that has long served as a peaceful, open space for local people. What's being proposed doesn't just add houses it risks tipping the balance of infrastructure, straining services, removing green spaces, and putting more pressure on roads and local amenities that are already struggling.

My concerns aren't abstract. They are grounded in lived experience the way traffic clogs up our roads during every M2 closure or school run, the way local fields offer a much-needed break from the built environment, and the way services like GP surgeries and schools are already stretched thin. This response sets out those concerns in detail, grounded in the real, everyday impact they would have on residents.

Through this consultation, I hope Medway Council will genuinely listen to the voices of local people. Strood deserves a future that respects its character, preserves what works, and improves what doesn't, not one that sacrifices key parts of the town for short-term development targets. I ask that the Council reconsider the inclusion of these sites in the Plan and reflect more carefully on how Medway's growth can be delivered in a balanced, sustainable and community driven way.

## **2. Highways and congestion**

I reflect daily on the unrelenting congestion that affects us whether it's school runs, commuting, or the backup caused by even minor closures on the M2 or A2. A recent M2 closure extended a 7-mile journey to nearly 2.5 hours. These are persistent issues, not anomalies.

Medway Council's Regulation 19 Local Plan estimates that sites SNF1–SNF4 will deliver hundreds of new homes, yet no site-specific transport modelling or highways mitigation is presented for these allocations. While the plan's Strategic Transport Assessment does consider wider road capacity challenges and junction signal upgrades on routes such as at Four Elms, Sans Pareil and Gillingham Gate, these are not tied back to Strood North nor offer clarity on how developments at SNF1–SNF4 will be accommodated.

Policy STROOD5 gives only broad statements on access and movement without specifying any transport evidence, mitigation strategies, or developer obligations for these specific parcel allocations. Likewise, the Infrastructure Delivery Plan (IDP) recognises transport pressure in the Medway Tunnel corridor and key junctions, but does not allocate funding, phasing, or implementation details for Strood North implementations.

Without such strategic-level transport planning or evidence of engagement with Kent County Council or National Highways especially considering the Lower Thames Crossing and Blue Bell Hill infrastructure changes the Local Plan lacks credibility for these allocations. It risks worsening the already fragile road network, undermining the plan's soundness, and treating transport capacity as an afterthought rather than a foundational requirement.

For Strood North allocations to be considered sustainable and deliverable, the Council must provide site specific traffic modelling, clearly costed mitigation proposals, and evidence of coordination with highway authorities. Without this, the Plan does not satisfy the soundness criteria under the NPPF and should not proceed in its current form.

### **3. Strategic transport links**

The location of Strood North sitting between the M2, A2, and key regional corridors means it is directly affected by wider strategic infrastructure pressures. Despite this, the Local Plan gives no indication that these have been properly factored into the proposed allocations at SNF1 to SNF4.

In particular:

- The Lower Thames Crossing (LTC) is a nationally significant infrastructure project which will alter traffic patterns across north Kent and bring added pressure to the A2 and its junctions near Strood.
- Blue Bell Hill, a key route connecting the M2 and M20, is also subject to significant improvement works which will have a knock-on effect on Medway's Road networks.
- The proximity of Strood to both the M2 and A2 makes it especially sensitive to diversions, disruptions, and overflow traffic resulting from any regional scheme. These projects are publicly available and well-known, yet the Medway Local Plan makes no meaningful reference to them, nor does it provide evidence that National Highways has been consulted in relation to these impacts on Strood. No traffic redistribution modelling or cumulative transport forecasting has been provided for SNF1–SNF4. The Strategic Transport Assessment appears to operate in isolation from these national schemes, which is a serious oversight given the scale and immediacy of these external pressures.

From a local perspective, we already see the impacts: any issue on the M2 or A2 brings instant gridlock into Strood, affecting schools, emergency services, and daily life. Adding hundreds of new homes into this fragile transport network with no published coordination or mitigation is short-sighted and risks locking in long-term traffic failure.

The Plan cannot be considered positively prepared or deliverable in relation to these sites if it fails to demonstrate that strategic infrastructure constraints have been assessed, planned for, and addressed. Strood North cannot be treated as an isolated development zone it sits within a live, pressurised transport corridor, and the Plan should reflect that reality.

### **4. Pollution and air quality**

Strood North sits within a complex and increasingly congested transport corridor, flanked by the A2 and M2 and subject to rising levels of vehicle-based pollution. While traffic is already a problem, it is the air quality and noise that have become a silent but serious concern especially during gridlock events or peak hour bottlenecks.

Despite this, the Medway Local Plan (Regulation 19) does not include any site-specific assessments of the impact that SNF1–SNF4 allocations will have on air quality, noise, or general environmental health. The Policy STROOD5 section makes no mention of pollution mitigation, and the Sustainability Appraisal provides only generic borough-wide commentary with no localised measurements or data relevant to Strood.



This is concerning for several reasons:

- Air quality is a recognised public health issue. Increased vehicular use which is guaranteed with hundreds of new homes will exacerbate poor air conditions unless actively mitigated.
- The topography of parts of Strood, including valley landscapes and enclosed routes, can result in air stagnation, compounding particulate concentration.
- Noise pollution is also likely to increase substantially, both during construction and after occupation, yet no noise modelling has been provided or referenced in the supporting documents.

Furthermore, the Plan does not set out:

- Any air quality monitoring data specific to Strood North
- Any mitigation measures (e.g. planting, barriers, EV infrastructure, route redesign)
- Or any assessment of the cumulative impact of nearby strategic infrastructure like the Lower Thames Crossing.

For a Local Plan to be considered sound, it must be justified and based on proportionate evidence. That includes understanding how proposed development affects the environmental wellbeing of both current and future residents. The omission of site-specific air and noise pollution evidence for SNF1–SNF4 renders this section of the Plan fundamentally incomplete.

These concerns are not academic they reflect real risks to the quality of life in Strood. Without mitigation and transparency on these environmental impacts, the Plan does not meet the expectations set by national planning policy or the needs of the community it is meant to serve.

## **5. Green belt re-designation (“Grey Belt”)**

Several of the proposed allocations in Strood North including parcels SNF1 and SNF3 sit on land that has historically been understood to form part of Medway’s strategic green buffer or functionally acted as Green Belt in terms of openness, visual break, and rural edge.

In previous versions of the Local Plan process, this land was considered unsuitable for development on sustainability grounds. However, in the current Regulation 19 draft, it now appears to have been informally rebranded as “grey belt” a term that has no legal or planning policy basis in the National Planning Policy Framework (NPPF) or supporting government guidance.

The Plan does not:

- Provide a formal Green Belt Review as supporting evidence
- Identify whether the land was ever formally designated as Green Belt under national policy
- Or explain when, how, or under what authority its status changed from protected land to land now considered developable.

The use of vague language like “grey belt” raises serious transparency issues. It creates the impression of a convenient workaround removing environmental safeguards without going through the proper evidentiary and policy channels.

National planning policy is clear: Green Belt land should only be altered in “exceptional circumstances”, such changes must be clearly evidenced and justified through the Local Plan process. If the SNF parcels were previously designated, or functioned as de facto Green Belt, then their inclusion in the housing allocations without this test being met is a significant failing.

Furthermore, even if the land is not technically designated as Green Belt, it remains open, agricultural land, offering landscape, ecological and recreational value to the community. Its loss still requires rigorous environmental and community impact assessment which the current Plan does not provide.

The Plan’s approach to these sites are inconsistent with national policy on openness, coalescence, and landscape protection. Without a formal Green Belt Review or proper justification for releasing this land, these allocations are neither justified nor sound under the Regulation 19 framework.

## **6. Loss of Tranquillity**

One of the most overlooked qualities of Strood North particularly across parcels SNF1 to SNF4 is the relative peace and quiet they provide. Despite their proximity to major routes like the A2 and M2, these open fields, edge-of-settlement spaces, and rural margins offer a much-needed buffer from noise, traffic, and urban intensity.

As a long-standing resident, I can say with certainty that these areas have long served as informal breathing space for the community. You can walk through them and hear birdsong, not engines. They represent some of the last remaining tranquil zones on this side of Medway; places where people go to decompress, walk, reflect, and connect with nature.

The proposed housing allocations across SNF1–SNF4 would see this tranquillity lost entirely. These sites would be transformed from low-impact agricultural land and semi-natural space into dense housing estates, bringing permanent noise, traffic, lighting, and visual disruption.

The Medway Local Plan makes no mention of the value of tranquillity or the role it plays in the health and wellbeing of existing residents. Yet national planning policy particularly Paragraph 185 of the National Planning Policy Framework (NPPF) explicitly states that planning decisions should:

“...identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value.”

No such identification or protection has taken place in this Plan. No tranquillity mapping has been done. No consideration has been given to how removing these spaces might impact public mental health or quality of life.

These edge-of-town green spaces are not just “leftover land” they are a valued and intentional part of the wider settlement character. Once they are built on, their qualities are lost forever. This is not a temporary trade off, it is a permanent sacrifice - and one that this Plan has not justified.

The loss of tranquillity from the SNF allocations would fundamentally change the character of Strood North, reducing its liveability and undermining the environmental and amenity balance that communities rely on. Without clear assessment or mitigation, this omission represents a failure of soundness and planning judgment under both local and national policy standards.

## **7. Loss of informal access and open space**

The open fields of Strood North particularly across SNF1, SNF2 and SNF3 are not just unallocated space. They are lived-in, used, and valued areas of informal open access. Generations of local residents, myself included, have walked through these fields for exercise, dog walking, or simple peace and quiet. They form part of the daily fabric of life in this part of Medway.

While these spaces may not be formally designated as public rights of way, they have nonetheless developed a strong sense of customary public use. Many local people assume rightly or wrongly that access is permitted because it has been unchallenged and consistent over time.

The proposed development of SNF1–SNF4 would permanently sever this informal access. The fields would be fenced, regraded, built upon, and effectively erased from local public life. What was once a freely used green space would be transformed into housing estates, with no clear proposals to provide equivalent replacement open space or community walking routes.

The Medway Local Plan (Regulation 19) makes only broad references to green infrastructure and access. It fails to:

- Map or acknowledge existing informal access routes across SNF parcels.
- Propose safeguarded or enhanced walking routes as part of the site allocation.
- Assess the amenity impact of severing access for residents who currently rely on these open fields.

This oversight undermines the Plan's claims of being sustainable and community led. It also runs contrary to the aims of the National Planning Policy Framework, which emphasises the importance of promoting healthy communities, protecting public access to open space, and ensuring development does not reduce the quality of life for existing residents.

If these allocations are to be considered at all, the Council must present:

- A clear audit of existing informal use and amenity value.
- A strategy to protect or replace local access to open space.
- And a justification for why this land, so actively used by the community, should be taken out of public reach without compensation or consultation.

At present, the loss of these fields is being treated as a land use transaction. But for residents in Strood North, it's a loss of amenity, routine, and identity: one that the current Plan neither acknowledges nor attempts to mitigate.

## 8. Infrastructure capacity

One of the most serious and practical concerns about the proposed Strood North allocations SNF1 to SNF4 is the complete lack of clarity over how local infrastructure will cope with the scale of new development.

Across Strood, we are already seeing the pressure on essential services: GP surgeries are full, dental appointments are increasingly hard to come by, schools are at or near capacity, and local public transport options are inconsistent or unreliable. Add to this the demand for water, energy, waste services and broadband infrastructure and it becomes clear that Strood's core systems are already under strain.

Yet the Medway Local Plan (Regulation 19) fails to provide any site-specific infrastructure analysis or delivery plan for these allocations. Policy STROOD5 offers no assurance on how services will be funded, phased, or expanded to accommodate several hundred new households in this tightly constrained part of Medway.

The Infrastructure Delivery Plan (IDP) includes generic projections and some borough-wide transport upgrades, but:

- It does not identify infrastructure packages or funding allocations for SNF1–NF4
- It lacks any schedule or phasing strategy for essential services tied to the timing of Strood development.
- And it contains no evidence that statutory providers (e.g. NHS Kent & Medway, Southeast Water, UK Power Networks) have confirmed deliverability of services in line with this growth.

This absence of clear infrastructure provision undermines both the soundness and deliverability of these allocations. According to the National Planning Policy Framework (NPPF), Local Plans must be positively prepared and demonstrate that development can be supported by necessary infrastructure especially in areas where existing services are already overstretched.

From a resident's perspective, these aren't abstract concerns. We see the queues outside GPs. We wait for school places. We lose time to service failures. The idea of building hundreds of new homes without a clearly funded, deliverable plan to match infrastructure to growth is not just frustrating, it's negligent.

Unless the Council can produce a Strood-specific infrastructure package that is:

- Evidence-based,
- Funded,
- And supported by statutory service providers,

...then the SNF allocations cannot be considered either sustainable or sound. Their inclusion in the Local Plan should be paused until a full infrastructure impact and delivery assessment has been completed and made available for public scrutiny.

## **9. Biodiversity and wildlife displacement**

The parcels identified as SNF1 to SNF4 in Strood North consist almost entirely of open land including grassland, hedgerows, and field margins which are used regularly by wildlife and contribute to the area's biodiversity. These areas are also contiguous with other green corridors, making them important in terms of habitat connectivity and local ecology.

As a resident who has walked these fields for decades, I can confirm their importance to local biodiversity: skylarks, rabbits, foxes, hedgehogs, and various bird species are frequently seen here. These parcels may appear undeveloped on paper, but they are very much a live part of a functioning local ecosystem that will be disrupted or destroyed by development.

Despite this, the Medway Local Plan (Regulation 19) contains no detailed ecological assessments for these sites. Policy STROOD5 makes no mention of biodiversity at all. There is:

- No species survey data presented for SNF1–SNF4.
- No identification of protected habitats or corridors.
- No ecological baseline conditions or seasonal studies.
- And no proposed mitigation, offsetting, or biodiversity net gain strategy specific to these sites.

This failure is especially concerning in light of current national policy. Under the Environment Act 2021, all new development must deliver at least a 10% biodiversity net gain, yet the Plan provides no evidence that this has been considered, modelled, or designed into the SNF allocations.

Furthermore, the Sustainability Appraisal offers only broad-brush references to biodiversity loss, with no parcel-specific evaluation of impact in Strood North.

For a Local Plan to be considered sound, it must be based on proportionate evidence and must demonstrate how environmental harm will be avoided or mitigated. These allocations do neither. They treat open, living land as if it were a blank canvas ignoring the species that already rely on it, and the residents who value it.

Unless comprehensive ecological assessments are undertaken including seasonal species surveys and biodiversity impact modelling, these allocations should not be advanced. Without that, the Plan risks breaching national policy on biodiversity and environmental protection and cannot be considered legally compliant or sound.

## **10. Duty to cooperate with Gravesham**

As Strood sits directly opposite the borough boundary with Gravesham, the proposed development of SNF1 to SNF4 has obvious and immediate cross-boundary implications. Yet the Medway Local Plan (Regulation 19) is silent on any meaningful coordination with Gravesham under the Duty to Cooperate, as required by national planning legislation.

The Duty to Cooperate is a legal test. It is not a soft aspiration or a box ticking exercise, it is designed to ensure that councils plan together on issues that cross boundaries, such as housing need, infrastructure, and environmental pressures.

Gravesham has publicly acknowledged that it cannot meet its full housing need within its own boundary and has previously requested support from neighbouring authorities, including Medway. If Medway has refused this support or failed to engage constructively, then that must be transparently recorded and justified within the evidence base of the Plan.

However, this Plan does not:

- Explain what engagement has taken place with Gravesham Borough Council.
- Set out any agreed position on shared housing need or unmet demand.
- Present any statement of common ground (required by national planning policy).
- Or show how the proposed allocations in Strood especially those closest to the borough boundary have been evaluated considering Gravesham's spatial constraints.

In failing to demonstrate how this cross-boundary relationship has been managed, Medway Council risks breaching its legal obligations under the Duty to Cooperate. This could render the entire Plan unsound or even unlawful at Examination.

More broadly, the absence of cross-border coordination also reflects poorly on the strategic planning foundations of the SNF allocations. If parcels SNF1–SNF4 were partly chosen for their “edge-of-Medway” location, yet no cooperation has taken place with Gravesham, then it raises the concern that these sites were selected in isolation without regard for the broader context in which Medway operates.

The Council must publish:

- A detailed account of engagement with Gravesham.
- Any statements of common ground, meeting minutes, or housing position papers.
- And any evidence that cross-boundary implications were considered in the site selection process.

Without these, the Plan fails to meet both the legal requirements of the Duty to Cooperate and the soundness tests of strategic justification and deliverability.

## **11. Perceived imbalance of influence**

I can't help but feel that the current Local Plan particularly the allocations at SNF1 to SNF4 reflects the priorities of developers far more than those of the local community.

The decision to focus so heavily on greenfield parcels in Strood North instead of prioritising previously developed brownfield land suggests a top-down planning process, one that has paid insufficient attention to the people who live here, understand the area, and will bear the consequences of these decisions.

While Medway Council has fulfilled its statutory consultation duties, there is little evidence that local feedback has meaningfully shaped the site selection process. Many residents have participated in previous rounds of consultation only to find their concerns largely unaddressed in this final draft. The public is being asked to accept major changes to their environment without a sense that their voices have influenced outcomes.

At the same time, developers and land promoters appear to have had disproportionate access and influence with many of the SNF sites promoted through earlier land call ins and developer representations. The Council has not adequately explained how it has balanced these interests with genuine community input.

This contributes to a growing erosion of public trust in the planning process: a problem that isn't unique to Medway, but one that must be actively countered through transparency, balanced decision making, and a clear commitment to community priorities.

The National Planning Policy Framework (NPPF) emphasises that plans should be shaped by early, proportionate, and effective engagement with communities. But in Strood North, many residents feel they've simply been presented with a *fait accompli* told what is going to happen, rather than asked what should happen.

This lack of visible responsiveness undermines the credibility of the site allocations in SNF1–SNF4. It raises valid concerns about whether this Local Plan reflects the real spatial and social priorities of Medway or whether it is overly driven by short term land availability and commercial lobbying.

A truly sound plan must do more than allocate housing sites. It must build confidence in the fairness and transparency of the process. Without that, public resistance will grow, not out of NIMBYism, but out of a sense that their communities are being reshaped without them.

## **12. Prioritisation of brownfield sites**

Medway like many parts of the Southeast contains a significant amount of underused or previously developed land. Brownfield land should form the starting point for housing delivery, both in line with national policy and in terms of protecting valuable greenfield space like that in Strood North.

However, the Medway Local Plan (Regulation 19) fails to explain why parcels SNF1 to SNF4 all of which sit on productive, undeveloped greenfield land have been prioritised over available brownfield alternatives. Despite repeated references throughout the Plan to the importance of brownfield development, there is:

- No brownfield capacity assessment included in the evidence base.
- No site selection comparison that weighs brownfield vs greenfield sustainability.
- And no demonstration that these SNF sites represent the least environmentally harmful, most infrastructure ready options.

In Strood in particular, there are smaller, disused plots, older industrial sites, and previously developed edges that could be intensified or regenerated but these do not feature in the allocations, despite being closer to existing infrastructure and employment areas.

The National Planning Policy Framework (NPPF) is clear on this matter. Paragraph 119 states: “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.” ...and goes on to prioritise: “substantial weight to the value of using suitable brownfield land within settlements for homes.”

The Plan as it stands does not reflect that principle. Instead, it seeks to convert high quality farmland and community valued green space into housing, without demonstrating that brownfield options have been exhausted or meaningfully tested.

This approach is not justified, nor is it consistent with national planning policy. It creates avoidable harm both to the environment and to public confidence and results in a Plan that cannot be considered positively prepared, justified, or effective under the Regulation 19 soundness tests.

If the Council intends to develop greenfield land, it must show clear and proportionate evidence that no viable brownfield alternatives exist, and that infrastructure, biodiversity, and community impacts have been fully assessed. No such evidence has been provided for SNF1–SNF4.

### **13. Safeguarding of existing pipelines and utilities**

As someone with longstanding knowledge of the Strood North area, I am aware as many residents are that there are known underground pipelines and service routes running through or near some of the SNF parcels identified for development. These include high pressure gas lines, water mains, and other critical utilities infrastructure.

The Medway Local Plan (Regulation 19) does not acknowledge these physical constraints. There is:

- No mention of utility safeguarding zones in the SNF1–SNF4 allocation text.
- No constraints mapping in the policies or supporting evidence.
- And no indication that statutory undertakers (e.g. SGN, Southern Water, UKPN) have been consulted regarding proximity of development to strategic buried assets.

This omission creates serious risk. Developing over or near critical buried infrastructure without due consideration could result in:

- Disruption to essential public services.
- Safety hazards during construction or future maintenance.
- Delays or cost escalations during the planning or implementation phase.
- And, potentially, the sterilisation of parts of the land, rendering them undevelopable, which calls the site's deliverability into question.

According to national guidance (including Planning Practice Guidance and NPPF Paragraph 34), Local Plans must be deliverable and informed by infrastructure capacity and constraint mapping.

The absence of any reference to physical service infrastructure in Strood North calls this deliverability into question.

In addition, utility providers typically require:

- Standoff distances,
- Easement strips,
- And unrestricted 24/7 access to strategic assets.



Without visibility on how these factors have been integrated into the site layout, phasing, and infrastructure design, the Plan is incomplete and unsound in its current form.

I request that the Council:

- Publish detailed utility constraints mapping for SNF1–SNF4.
- Confirm that relevant infrastructure operators have been consulted.
- And revise the Plan to include clear commitments to safeguarding underground services and delivery-critical assets.

Until this is done, the SNF allocations cannot be deemed safe, deliverable, or compliant with national policy.

#### **14. Local road functionality**

Strood's local road network is already under considerable pressure, and this is based on current population levels. Roads such as Watling Street, Cuxton Road, and Rede Court Road regularly experience congestion, especially during school drop-off times, shift changes, or when incidents on the A2/M2 redirect traffic through local streets.

The proposed development of parcels SNF1 to SNF4 will introduce hundreds of additional vehicles into this already fragile network but the Medway Local Plan (Regulation 19) contains no specific analysis of how this impact will be absorbed, managed, or mitigated.

In particular:

- Policy STROOD5 offers only general language about “access and movement” and does not reference any local road assessments or junction capacity testing.
- The Strategic Transport Assessment provides high level Medway wide junction commentary, but not site-specific traffic flow modelling for Strood's internal roads.
- There are no confirmed local highway upgrades, signal improvements, or traffic calming schemes tied to the SNF allocations.

From a local resident's perspective, this is deeply concerning. Strood is not just a through route it is a lived-in town with constrained road widths, tight junctions, school crossings, and pedestrian heavy areas. Adding high-density development to Strood North without preparing its roads is a recipe for:

- Longer commute and travel times.
- Increased accident risk at pinch points.
- Emergency vehicle delays.
- Greater pressure on parking, school access, and public safety.

The NPPF is clear that development should not go ahead if the residual cumulative impact on the transport network would be severe, yet no such cumulative assessment has been done here.

In the absence of:

- Local junction modelling,
- A phased traffic mitigation plan,
- And consultation with Kent Highways or National Highways about Strood specific impacts.

...the site allocations at SNF1–SNF4 are unsound. They rely on infrastructure that is not fit for purpose, and the Plan offers no credible evidence that this will change.

Until Medway Council can demonstrate that Strood’s local roads can safely and efficiently accommodate the impact of these developments, the SNF allocations must be reconsidered.

## **15. Consultation timing**

The Regulation 19 consultation period for the Medway Local Plan has fallen squarely within the peak summer holiday season, running across late July and early August a time when many families are away, schools are closed, and residents are rightly focused on personal and family matters.

While I recognise that statutory deadlines must be met, the choice to schedule one of the most consequential consultations in a generation during this time raises serious concerns about accessibility, transparency, and meaningful community engagement.

In Strood North, this issue is particularly pronounced. Many residents:

- Work long, shift based hours (especially those in logistics, aviation, and public service roles).
- Rely on school holidays for rare family time or essential respite.
- Are not comfortable navigating online portals or complex PDF-based submissions without assistance.

Yet, despite the importance of this Plan and the scale of development proposed for SNF1 to SNF4 there have been no additional in person engagement sessions, no postal questionnaires, no extended drop ins, and no targeted outreach to help local residents engage in a meaningful way during this limited window.

The National Planning Policy Framework (NPPF) states clearly that planning should be: “...genuinely plan led, with succinct and up-to-date plans providing a positive vision for the future of each area, a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

Scheduling the Regulation 19 consultation during the busiest absence period of the year does not reflect this vision. It risks making the process appear rushed, inaccessible, and procedurally hollow especially to those who care deeply about their community but cannot easily navigate the technical and timing hurdles.

I urge Medway Council to:

- Extend the consultation period.
- Provide additional engagement opportunities once the summer period ends.
- And publish a clear summary of how responses particularly from communities like Strood North will be reviewed, reported, and acted upon.

A sound Local Plan is not just about policies and parcels, it's about public confidence. Without real effort to bring people along, that confidence will continue to erode.

### **Closing Summary**

I fully appreciate the scale and complexity of preparing a Local Plan particularly in a borough as geographically constrained and socially diverse as Medway. It's clear that a great deal of work has gone into reaching this stage, and I don't underestimate the pressure the Council is under to meet government targets, plan for growth, and balance competing priorities across the area.

That said, the feeling among many in Strood North myself included is that we've been placed on the receiving end of decisions, rather than genuinely included in shaping them. The proposed development of parcels SNF1 to SNF4 raises serious questions about infrastructure, transport, environment, and the long-term wellbeing of our community. These are not abstract or reactive concerns they are grounded in lived experience and supported by the gaps we've identified in the Plan.

I do not object to the principle of growth, or to the Council trying to move Medway forward. I believe that growth must be shaped with not just for local communities. The allocations in Strood North risk altering the identity, liveability, and functioning of the area in ways that have not been fully assessed, evidenced, or explained.

I hope these comments are received in the spirit intended, not as obstruction, but as an appeal for better planning, deeper engagement, and more transparent decision making. The people of Medway especially those of us who've lived here all our lives deserve to feel that we've been heard, and that the future being built around us is one we've had a hand in shaping.

Yours Faithfully,

Kelvin Carr

**From:** [Medway Council](#)  
**To:** [policy, planning](#)  
**Subject:** Contact Form from OpusConsult  
**Date:** 05 August 2025 13:53:41

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You have received a message from the OpusConsult contact form

From: Miss Maggie Antoniou

Email: [REDACTED]

Message:

I am writing in relation to Medway Council's proposed New Local Plan 2041. I welcome the Plan as I know the importance that such a document must help set out how Medway will grow in future years.

I am also aware that each Authority must follow National Planning Policy when it comes to the building of new houses to cover any shortfall. However, at the same time such shortfall should be built on the appropriate land first NOT on Green belt land. Alternative solutions are needed first and the use of brownfield sites developments or regenerate derelict underused urban area.

It is for this reason I am writing to object to sections 4.10 Policy SA6 (Strood West) and 4.12 Green Belt of the Local Plan.

1. In the first draft of the Local Plan 2023 and in the Green Belt study this was considered an important piece of Green Belt land. With quotes from the National Planning Policy Framework (NPPF) of its importance. Also, the importance of the prevention of neighbouring towns merging into one and other.

2. In the New Local Plan sections 4.12.3 and 4.12.4 the Council states changing the designation of Green Belt land to Grey Belt. The NPPF Policy states that Green Belt boundaries should only change in exceptional circumstances. There are none in regards to Medway and none have been stated as part of why these changes have been made in the new Local Plan. No indication was made to the public of such changes until The Local Plan was put forward.

3. The term Grey Belt which Medway Council has used to change the designation of the Green Belt is not a recognised planning category. Also, it appears to be described of "low quality" even though the land has been farmed on for many years

4. Gravesham BC Local Plan Regulation 19 has still not been published and a draft still not been seen and therefore no change to their Green Belt policy has been made. Medway's Green Belt Policy should not be changed as we are informed this Policy was made in conjunction with Gravesham and therefore approving this before Gravesham's will be premature.

5. The Green Belt land is currently prime agriculture land which are still farmed yearly, which is important for economic stability and food security


6. Any Changes will have an impact on the wildlife including the, bats, and skylarks. Any new houses will have an impact on their habitat any construction and any disturbance caused through pollution light and pollution. Bats which are seen within this area are legally protected vulnerable species in Britain.

7. There is an inadequate infrastructure with the local area to accommodate the additional houses, such as doctors, roads, public transport, shops, and hospitals.

8. The air pollution from more cars in such a small area is not good for the health of the local community

9. The road network within the West Strood area is poor as it stands now with congestion on a daily bases, to add a potentially 4000 homes within the current network system with 2/3 cars is impossible and dangerous. The ingress and egress into the proposed new estates is dangerous with narrow roads and house that already have 3/4 car in a family and park on the road! However, no traffic management impact survey has been seen to be carried out.

## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Rob"/>	<input type="text"/>
Last Name	<input type="text" value="Sibley"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="ME3"/> <input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Medway Council has carried out extensive consultation. I have participated in Local Events. Staff have been helpful and knowledgeable. Medway residents have had ample opportunity for comment.

Medway needs a Local Plan and this should be progressed with all speed.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.  
**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ **No**, I do not wish to participate in hearing session(s)

☐ **Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan Regulation 19 Consultation - Representation  
**Date:** 05 August 2025 15:44:36

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Mr Stephen Dyke

[REDACTED] ME2 [REDACTED]  
[REDACTED]  
[REDACTED]

I welcome the drafting of the Local Plan and generally support its strategy and policies. I appreciate the work that has been done by Medway Council staff and others to reach this point. However, I want to make a representation about one part where I believe the draft Plan is not legally compliant or sound, and where there may have been a failure of the duty to co-operate.

My representation relates to **Section 14.7** (which includes **Policy SA6**), “Strood West”. Of concern to me is the proposal relating to those areas with a Policies Map ID of:

**SNF1** (land west of the A226 Gravesend Road and north of Brompton Farm Road); and

**SNF3** (land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road)

These areas are currently part of the Green Belt, and the proposal is to re-classify them as ‘grey belt’ to clearly permit development.

I believe this proposal is **not legally compliant** for the following reasons.

The National Planning Policy Framework (NPPF) requires Medway Council to evidence and justify “exceptional circumstances” if they want to alter Strood’s Green Belt boundaries and re-classify these areas as ‘grey belt’. I do not think the Council has done this. This is important because once Green Belt is lost it is gone forever.

When residents were invited to respond to the Regulation 18 consultation last year, one of the supporting documents was a Green Belt Review from 2018. This clearly concluded that “Parcel 2”, which includes SNF1 and SNF3 (and whose land use consisted of “a mixture of arable, horticulture and orchards”) made a “**high contribution to [the] Purpose and Aims of Green Belt**” as set out in the NPPF. This Review also identified no boundary anomalies and proposed no change to its Green Belt status.

However, things have been rewritten completely in the draft Local Plan. This follows a new “in-house” Green Belt Review by the Council this year, which changed the contribution provided by Parcel 2 to the purpose and aims of the Green Belt from “high” to “not

significant". As a result, the Council has concluded that Parcel 2 can now be called "grey belt". The Plan suggests that the necessary "exceptional circumstances" to reclassify the area have been determined, but the latest Review does not clearly state what these circumstances are. This decision by the Council also shows a lack of transparency, as this dramatic change in the view of the contribution made by Parcel 2 was not highlighted to residents likely to be affected before this latest consultation commenced. The first most residents knew of this was when the Regulation 19 consultation documents were published. This Parcel 2 remains productive agricultural land (not "previously developed land" as described in the "grey belt" definition in the Glossary to the NPPF) and still serves an important role in helping to check the unrestricted sprawl of the already built-up areas of Strood and Frindsbury. It is certainly not what I understood "grey belt" to mean when it was announced by the Prime Minister and others.

I believe it is **not sound** for the following reasons.

Paragraph 36 of the NPPF gives four tests to determine if a Plan is 'sound'. I think the draft Local Plan fails on this as respects Strood West essentially under sub-paragraphs b) and d) of paragraph 36:

*[Plans are 'sound' if they are...]*

*"b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

The NPPF describes the purpose of the planning system as "to contribute to the achievement of sustainable development". Its paragraph 8 lists three "overarching objectives" for achieving this. One of these is environmental, which includes the protection and enhancement of the natural environment and improving biodiversity.

I believe that land in the Green Belt land is safeguarded from development to protect natural habitat and support environmental sustainability. If the Council allows development to proceed in these areas without there being adequate environmental impact assessments or biodiversity compensation strategies, this will seem to be inconsistent with the national policy over the Green Belt.

It is also worth noting that in Medway Council's Regulation 18 consultation document from September 2024, the Council acknowledged that there *"is a strong presumption in national planning policy that Councils should seek to protect the Green Belt from development, and where needing to allocate land for growth, sites outside of the Green Belt should be considered in preference to Green Belt release"*. It seems to me that Medway Council has not adequately considered alternatives to the re-classification of SNF1 and SNF3.

This re-classification to permit development may also call into question **Section 4.3** of the Local Plan, and specifically **Policy S2**. I am concerned that the effect of development will impact negatively on the nearby local nature reserve of Rede Common. This reserve is of ecological importance as an important refuge and transit route for species who need to be able to move freely between surrounding green spaces for feeding, breeding and shelter. The several thousand homes that may eventually be built on these parcels of land could further fragment the existing green corridors and reduce habitat connectivity. Add to this the inevitable increased disturbance through noise, light pollution and human activity, this will put additional pressure on local wildlife populations at a time when it is recognised that biodiversity in the UK is in crisis.

I believe there may have been **a failure of the duty to co-operate** because the degree of cross-boundary co-operation with Gravesham Council over these areas is unclear (SNF1 and SNF 3 are within the areas controlled by both authorities). This process has not been transparent and there does not seem to have been any meaningful engagement with residents likely to be affected. This is a major change which will potentially increase the urban area of Strood and Frindsbury by 30%. The process by which Medway and Gravesham Council decided to seek re-classification of this area of Green Belt as “grey belt” is not clear. Medway’s draft Local Plan has been published making assumptions about what Gravesham’s Local Plan will contain before theirs was even approved and published.

To ensure legal compliance and soundness, I believe **the following modifications to the Plan are necessary**:

- 1. Remove SNF1 and SNF3 from the proposed development sites as these are part of the protected Green Belt. No “exceptional circumstances” have been adequately demonstrated to justify their release for development through the re-classification as “grey belt”.
- 2. Engage with the residents in nearby areas to SNF1 and SNF3, plus the wider Medway public and other stakeholders, before any decision on re-classification is taken. This should be supported by clear and accurate environmental data so that it will be clear to people what may be lost from an ecological viewpoint. The re-classification was not proposed at the time of the Regulation 18 consultation, the last time the public had a chance to directly influence the Local Plan. There is a perception that this decision was hidden from those likely to be directly affected until the last possible moment, creating further mistrust in the planning system.

Many thanks

Stephen Dyke

**Representation in response to  
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of Allhallows on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination. I do not wish to participate in the hearing sessions.

**The Local Plan is not legally compliant, is not legally sound and it does not comply with Duty to Co-operate for the following reasons.**

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Kind regards,

Name: Paul Skues

Address: [REDACTED] ME3 [REDACTED]

Date: 05/08/2025

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan 2041  
**Date:** 06 August 2025 23:44:29

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Sirs

The overall impression I gain from plans presented in the booklet and displayed in the Millennium Centre Rainham is a disregard for the existing residents feelings, prioritising the expansion of development to its limits.

The Lower Rainham Road concept plan suggests "potential road widening" "potential School" which is one step ahead of the Capstone Concept, as there is no such proposal for the latter. GP surgeries may well be included in the plans, but considering the critical shortage of Doctors it is uncertain whether these practices will function.

Medway Maritime Hospital is currently experiencing dangerously high waiting lists.

A planning representative at the Millennium Centre consultation informed me there are no plans for an increase in capacity at the hospital, which comes under the jurisdiction of the Department of Health.

A significant portion of the proposed development will be constructed on land at risk of flooding. Does the developer have any obligation to inform potential purchasers of this risk? Without flood plains water will naturally find its own level elsewhere.

When asked if any of the 24,500 new properties will be designated for social housing or affordable homes, the representative was unable to provide an answer stating that this decision is made by the developer. Given that 20,500 individuals are currently on Medway's social housing list this is totally unacceptable.

Referring to the summer edition of Medway Matters page 31, it is unclear whether Medway Council will continue to exist under the governments intention to reform the 14 existing Kent councils. Potentially this development will get the go ahead from one authority and another will be charged with overseeing. This scenario closely resembles the aftermath of Brexit.

Several people within my social group who upon reviewing the booklet expressed their unhappiness, stating that such radical plans will significantly change their lives.

This proposal will disrupt family groups that have lived in the area for generations, have made contributions to the local community but feel this is no longer where they want to live.

As this is a consultation and feed back is welcome, I hope the planning committee will take the concerns of the public into account.

Carol Pires  
Sent from my iPad

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Fwd: Local Plan  
**Date:** 07 August 2025 10:34:28

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Only 8500 houses are to be built on brownfield site which mean the remainder will be built on green, predominantly farmland which means we will be producing less sustainable food even though we are often told we should buy local produce. The farmland in Medway is rapidly disappearing and I doubt there will be any farms by 2041.

How are you going to guarantee the water supply for all these homes and for the sewage treatment?

Medway Council promises improved transport but that is beyond their remit. Unless they are funding the transport it cannot be guaranteed that a bus company will provide a route if it is found to be unprofitable.

The number of homes proposed means an extra 50,000 cars on our already congested roads. Public transport does not go door to door and therefore a long walk may also be need to get to a destination, not something to be undertaken in the dark. How is the Council proposing to ease congestion as the towns already on occasions becomes gridlocked.

Although additional health services are going to be provided the Council cannot guarantee there will be staff to run them.

I was disappointed to see no provision for a new hospital.

At the consultation I referred to the planned housing on Medway City Estate and asked where the businesses affected would be moved to and was told this hadn't been decided. Surely this should have been discussed with those businesses before allocating the area for housing. They would obviously need somewhere that is easily accessible and central. I doubt if housing would ease congestion from the estate as there would probably be an extra 1600 cars from the housing development.

Have the businesses currently at Chatham Docks been allocated land elsewhere?

Mrs P Sharp

[REDACTED]  
ME7 [REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Cc:** [REDACTED]  
**Subject:** Medway Local Plan  
**Date:** 07 August 2025 11:30:13

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Good morning,

I wish to comment on the Medway Local Plan.

In principle I agree a plan is vital to try and provide a cohesive and sustainable way forward to providing housing for current and future generations. I do have grave concerns about some of the aspects in the plan.

No provision for extra capacity at Medway Maritime Hospital as I recently experienced a 6 ½ hour wait in ED. Medway Hospital is not unique in a lack of capacity but to plan to build many more homes in an already over stretched Hospital is ridiculous and potentially life threatening

No clear provision for additional GP surgeries, in an area where there are already long waits for GP appointment due in part to the inability to recruit and retain GPs.

In respect to the area where I live ( adjacent to SA6) I am astounded that when in opposition the current party in agreement with local residents and the Government Inspector agreed that this site was not suitable or appropriate for development.

This area is part of the Green Belt , a natural lung for Medway and a barrier to encroachment of development from Gravesham. The area is farm land and I fail to see how this invented designation of 'Grey Belt' applies to this area.

I am concerned that if heaven forbid this area is developed that is a potential for crime increase, as prior to that construction of the A289 bypass, burglary was prevalent in Brompton Farm Road due to the ability of criminals to access the rear of the properties on the north side of the road vis Stonehorse Lane ( anecdotal evidence for current and previous residents). Cutting the lane virtually eliminated the treat, and developing the area will give easier access to the rear of my property with the possibility of increases to Home Insurance premiums.

It is well known that the existing local road network is already unable to cope with the levels of traffic particularly the A289 from the B200 junction to Four Elms roundabout, and traffic jams are regular on Brompton Farm Road as motorists try to find a 'short cut' added to the congestion during term time of minibuses and taxis delivering and collecting students to Abbey Court School parking on the pavements in Cliffe Road and Brompton Farm Road, causing chaos and potential accident on the roundabout, bringing more students to Temple Farm School makes no sense. There appears to be no provision despite protestations by the council of an Infrastructure First approach as I fail to see how any of these proposed developments will be able to access anywhere, where will the roads go?

The area is popular with all members of the community for recreation (walking) and destroying the Green Belt is against promoting wellbeing by getting back to nature, soon there will not be any left in Medway. The council should abandon any thought of developing on ANY area of Geen Belt and concentrate on Brown Field sites and other areas more suitable for residential development.

I feel I need to make my views known and that the council will at least consider the voice of



the people.  
Cliff Webb

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan  
**Date:** 10 August 2025 17:23:55

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Good afternoon

I would like to submit an objection to the proposed Medway local Plan. Whilst I broadly support the need for a Local Plan in principle, I have some serious concerns around some of the current proposals.

I live in Brompton Farm Road, adjacent to SA6.....my comments are not in any order of priority.

As a Retired Nurse, having worked at Medway Maritime Hospital for 30 years the lack of planning for any additional capacity at Medway Hospital concerns me deeply, I am fully aware historically of difficulties recruiting and retaining both Medical and Nursing staff. I recently spent 6.5 hours at Medway ED with my husband.. after queuing to get into ED.... the current lack of staff resources was clearly demonstrated.. building more homes in an area with a hospital already stretched to beyond capacity.....without additional hospital services provision is frankly irresponsible and a risk to the lives of those currently in our community

and any additional residents in the future.

There are also currently long waits for GP appointments across our area – I am told due to difficulties recruiting and retaining GPs. There does not seem to be any clear provision for any additional GP services with these additional homes...

Personal impact: The additional homes causing further strain on struggling healthcare services.....increasing difficulties getting GP appointments leading to waiting until our condition worsens and then burden ED even further....as well as longer waits for routine hospital appointments.

I am at a loss to understand this major shift in Green Belt Policy, the current party when in opposition, agreed this site was not suitable or appropriate for development... in agreement with local residents and the Government Inspector... I attended that meeting. The Green Belt review was apparently critiqued by Independent Consultants but this has not been made public...this concerns me.

This area is part of the Green Belt...supposedly preventing urban sprawl and providing a barrier to encroachment from Gravesham. I suffer with Asthma and moved to this area because of the easy access to open land. Erosion of Green Belt land is also contrary to National Planning principles.

I had never heard the term “Grey Belt” until this Local Plan was published and would refute the description of the land as “low quality” as it is currently being used as farmland. Is this a recognised category and what evidence was used for this classification?

The lack of transparency around all of this concerns me and hints at subterfuge. It

promotes a strong feeling that rather than putting residents first Medway Council is working more closely with developers.

Personal impact:

There is a potential for increase in crime with development in this area....prior to construction of the A289 there is anecdotal evidence (from current and previous residents) that the rate of burglary was much higher than currently....due to criminals being able to access the rear of the properties on the north side of the road via Stonehorse Lane... closing the lane virtually eliminated that threat. Development of that area will give easier access to the rear of my property and potentially incur increased home insurance premiums.

Infrastructure issues: The existing local road network is already unable to cope with the level of traffic. Brompton Farm Road traffic already grinds to a halt with regular traffic jams.. if there are any issues on M2, A289 and B2000 junctions to Four Elms roundabout as motorists try to find a short cut.

This can only deteriorate further with additional houses and therefore cars. The small roundabout at the junction of Brompton Farm Road and Cliffe Road is already congested with double parked mini-buses morning and evening bringing disabled children to Abbey Court School.... causing regular chaos and potential for accidents. The proposal for increasing students at Temple Mill School makes no sense.

We are advised by the Council of an Infrastructure first approach with these developments but I am having difficulty envisioning this....the houses often seem to come but the infrastructure support doesn't quite make it and we are left with even more chaos. Where will the roads go for these proposed developments?

Impact on quality of life.. the area is popular with all members of our community for walking ... erosion of Green Belt land would cause long term environmental damage with loss of wildlife habitat and is contradictory for wellbeing and getting back to nature. This is farming land and as such needs to be preserved... with conflicts abroad and difficulty with accessing some foods (in evidence in our supermarkets currently) we may need to increase our own food production again in the future... how do we do this if we have built on all this land? If these proposed plans for Medway go ahead and with planned building from the Gravesham side the only "Green Belt" left will be the A289!

The Council should abandon any plans to build on Green Belt land and focus more on brownfield sites. I attended the Residents Meeting on 7<sup>th</sup> August... it was well attended with the residents voicing many of the concerns listed above.

I wish to make my views known as a resident of Brompton Farm Road.. this plan does not seem well thought out.. there seem to be many discrepancies and unanswered questions....despite attending the Residents Meeting.

Kind Regards  
Cliff Webb

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Article 4 direction  
**Date:** 07 August 2025 13:32:18

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I would like to ask the council to include article 4 direction in the future planning policy for medway  
Regards Mervyn wood  
[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Planning Consultation  
**Date:** 07 August 2025 15:51:41

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Dear Planning Department,

**Subject: Implementing Article 4 Directions to Protect Communities from Misuse of LDC Applications**

As a resident of Medway, I am writing to urge Medway Council to implement Article 4 Directions to safeguard communities from the detrimental effects of Lawful Development Certificate (LDC) applications being used as a backdoor to bypass planning permission. The misuse of permitted development rights through LDCs is undermining the character, amenity, and well-being of our neighbourhoods, and Article 4 Directions offer a critical mechanism to protect residents.

LDC applications allow developers to exploit permitted development rights for projects like converting single-family homes (C3 use) into Houses in Multiple Occupation (HMOs, C4 use) or making external alterations without requiring full planning permission. This circumvents community input and rigorous scrutiny, leading to significant negative impacts on residents, including:

- **Erosion of Neighbourhood Character:** In areas like New Road, Rochester, or Star Hill to Sun Pier, LDC-approved changes, such as HMO conversions or unsympathetic extensions, degrade the historic and architectural integrity of conservation areas.
- **Strain on Infrastructure and Services:** HMO conversions via LDCs, common in areas like Gillingham and Chatham, increase population density, exacerbating parking shortages, waste management issues, and pressure on utilities.
- **Anti-Social Behaviour and Community Disruption:** Unregulated HMOs facilitated by LDCs can contribute to noise, litter, and anti-social behaviour, reducing residents' quality of life and neighbourhood cohesion.
- **Exclusion of Community Voice:** Unlike planning applications, LDCs require no public consultation, leaving residents powerless to address developments that affect their daily lives.

Article 4 Directions, by removing specific permitted development rights and requiring planning permission, would protect Medway's communities in the following ways:

- **Preserving Local Character:** In conservation areas, Article 4 Directions would ensure that LDC applications for alterations (e.g., external cladding or HMO

conversions) are subject to planning scrutiny, protecting the aesthetic and historic value of areas like Rochester's High Street. This aligns with existing Article 4 Directions, such as those in New Road, which already require permission for minor residential changes.

- **Mitigating Infrastructure Overload:** By requiring planning permission for HMO conversions, Article 4 Directions would allow the council to assess impacts on parking, waste, and local services, preventing the overburdening of infrastructure in densely populated areas.
- **Reducing Anti-Social Behaviour:** Mandating planning permission for HMOs via Article 4 Directions would enable the council to impose conditions or refuse applications in areas prone to anti-social behaviour, addressing resident concerns about transient populations or property neglect.
- **Empowering Communities:** Article 4 Directions would restore residents' ability to engage in the planning process by requiring public consultation for developments currently approved via LDCs, ensuring community voices are heard and considered.

To implement Article 4 Directions effectively, I recommend the following:

- **Targeted Application in Vulnerable Areas:** Expand Article 4 Directions to conservation areas and neighbourhoods with high HMO activity, such as parts of Chatham or Gillingham, to restrict LDC-approved C3-to-C4 conversions. Unlike Bexley, which uses Article 4 to control HMOs, Medway's limited use leaves communities exposed.
- **Safeguard Rural Landscapes:** Apply Article 4 Directions to rural areas, such as the Hoo Peninsula, to prevent LDC-approved developments like fences or outbuildings from harming biodiversity or visual amenity, building on precedents like the Article 4 Direction for land between Elmhaven Marina and Cemex, Halling.
- **Enhance Transparency and Enforcement:** Clarify how LDC applications are assessed and ensure Article 4 Directions are consistently enforced to close loopholes. Update the council's website with accessible guidance on Article 4 areas and their role in preventing LDC misuse.
- **Integrate with the Local Plan:** As part of the Regulation 19 consultation for the Medway Local Plan 2041, identify areas where LDC misuse undermines policies like sustainable growth or climate resilience, and embed Article 4 Directions to protect residents.
- **Engage Communities:** Conduct public consultations to pinpoint areas where LDC misuse is prevalent and prioritize Article 4 Directions accordingly. Collaborate with residents and Parish Councils to align directions with

community needs, particularly in areas affected by HMOs or anti-social behaviour.

The misuse of LDC applications to bypass planning permission is a pressing issue that Article 4 Directions can address by restoring oversight and protecting residents from uncontrolled development. By implementing these directions, Medway Council can preserve local character, reduce strain on infrastructure, mitigate anti-social behaviour, and empower communities to shape their neighbourhoods.

I appreciate the council's commitment to balancing development with community needs. Please confirm receipt of this letter and consider these recommendations in future planning decisions, including the Local Plan consultation. I am available to discuss this further or provide additional feedback.

Thank you for addressing this critical issue.

Yours Sincerely  
David Constable

[REDACTED]

[REDACTED]

[REDACTED]

ME7 [REDACTED]

**From:** [andy mugford](#)  
**To:** [policy, planning](#)  
**Subject:** Suggestion for Medway to Adopt Article 4 Requiring a HMO to go Through Planning Approval.  
**Date:** 07 August 2025 18:11:23

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Can you please consider implementing an Article 4 Direction in Medway, which would require any conversion of a residential dwelling into a House in Multiple Occupation (HMO) to be subject to the full planning permission process and formal approval.

Thank you,  
Andy Mugford

[REDACTED]  
[REDACTED]  
[REDACTED] ME7 [REDACTED]



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Suggestion for Medway to Adopt Article 4 Requiring a HMO to go Through Planning Approval.  
**Date:** 07 August 2025 18:19:56

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Can you please consider implementing an Article 4 Direction in Medway, which would require any conversion of a residential dwelling into a House in Multiple Occupation (HMO) to be subject to the full planning permission process and formal approval?

**K. Mugford**

[REDACTED]  
ME7 [REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Local plan for Medway Council consultation document.  
**Date:** 07 August 2025 18:58:38

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Dear sirs

Please see my comment in regard to the Local Plan for Medway consultation document.

Section 6 HMO's

I note that Article 4 being has not be committed to by Medway Council.

I suggest that Medway Council should commit to the Article 4 direction to ensure that the houses are protected from becoming a mass of HMO's in an already congested area.

Many thanks

Claire Burton

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Full consideration and adoption of Article 4 Direction to cover the whole of Medway  
**Date:** 07 August 2025 21:00:24

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## Re: Medway Local Plan Regukation 19 Consultation

To whomever it may concern:

This is a formal suggestion-based email relating to the above matter, in terms of what we as long-term residents consider will be good for Medway's overall population.

We are requesting that an **Article 4 Direction** is seriously considered to be adopted in the future for the **whole of Medway**, in order to prevent an unprecedented increase in the current level of Applications for Lawful Certificates of Development relating to proposed changes of use of C3 dwellings to HMOs (C4);

Having such an Article 4 Direction in place for the whole of Medway, will, we beleive, protect established family housing and Medway's residents; provide an effective means to safeguard well-established community balance; as well as undoubtedly deter/prevent unscrupulous developers from applying for LDC's, as a means to circumvent formal planning policies/procedures; as they would appear to be endeavouring to do at present; thereby causing considerable stress to large numbers of residents within quiet, long-standing residential localities

We therefore ask that you give full and serious consideration to our formal request.

Yours sincerely,

Nigel and Rosalyn Leonard

[REDACTED] ME7 [REDACTED]

(Address to be withheld from public view).



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**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Article 4 needed for Medway to restrict HMO namely 131 Hamelin  
**Date:** 07 August 2025 21:54:25

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Dear Sirs

It has been identified very recently that some or maybe most of Medway does not have an Article 4 in place as part of their planning policies.

I strongly believe that there is a need for Medway to adopt Article 4 going forward.

This Article 4 would then restrict the likes of HMO applications, as would not then be able to put LCDs in like the one we are facing with in Darland, namely 131 Hamelin.

With kind regards

Mrs Cherilea Smith  
[REDACTED]

[Sent from Sky Yahoo Mail for iPhone](#)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Article 4 direction  
**Date:** 08 August 2025 14:43:22

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Dear all

I have become aware of the comprehensive lack of Article 4 Direction in Medway.  
This only covers a few roads but needs to cover every residential street in Medway.  
There are too many HMO's being allowed in family home neighbourhoods.  
As well as quite often being a disproportionate building aesthetically, there is very often a problem with parking.  
We do not want our borough to become a HMO hot-spot.  
Please implement an Article Direction.

Yours

Caroline Crouch

[REDACTED] ME8 [REDACTED]

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** MEDWAY LOCAL PLAN 2041  
**Date:** 09 August 2025 11:45:34

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I have several concerns about the infra-structure coping with the proposed developments in the Medway area. Whilst I understand from attending a recent Consultaion Meeting that it is thought most things can be improved with the right investment, if that is forthcoming, my main concern is about the water supply.

At the consultation meeting I raised this concern with the Planning Officer, who informed me that the Water Companies supplying the Medway area had been approached and claim they are able to cope with this level of development.

I am sceptical that this is the case as this summer there are hosepipe bans in places and we are now being advised of several ways we can save water as supplies are becoming low.

We know this is because of a lack of rainfall but when there is any substantial rainfall this results in waste water including sewage being released into the sea and watercourses to prevent this backing up into properties.

This would suggest to me that the system is not even able to cope with current development.

We are all being asked to pay substantially more for our water supplies to improve infra-structure but a significant amount of this money is paid to Water Company Shareholders.

I do not think enough will be invested in the infra-structure to cope with the proposed developments as, unlike other utilities, water cannot be produced when it is needed.

I hope this matter will be considered when any final decisions are made.

Lesley Harrison

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan  
**Date:** 09 August 2025 12:38:59

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Hi

I am writing regarding concerns I have about the newly proposed Local Plan. Whilst I fully support the need for a local plan and agree with the majority of the content I do have concerns about the proposal to allow the development of green belt land in Strood.

The land I refer to are Greenbelt parcels 2 to 4 which is the location of Policy SA6, Land West of Strood. This land was originally Greenbelt protected. Green Belt Policy S7 of the proposed local plan, now reclassifies this land as the newly introduced Greybelt category. The government have clearly stated that the description of grey belt is for “poor quality and ugly areas”. It is my opinion that this land does not fall within the Greybelt category. It is currently agricultural land with footpaths and beautiful views. I frequently walk the area with Medway Ramblers. I would not do so if the area was “ugly”. It is currently the only countryside walk I can do straight from my house which does not involve getting into my car.

I don't feel that the council have taken into consideration what the governments definition of Greybelt actually means and have conveniently regraded the land in order to rush through a plan. There has been no consultation with the public and local council representatives regarding the policy change.

Why are parcels 2 to 4 the only parts of Medway's Greenbelt to be included in the plan as Greybelt?

I object to policies SA6 and S7.

Louise Hubbard

[REDACTED]  
[REDACTED]  
ME2 [REDACTED]

## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this  
representation relates:

Medway Local Plan

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)  
boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Christine"/>	<input type="text"/>
Last Name	<input type="text" value="Marsh"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="ME2 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>



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## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="/"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="/"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="/"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Not legal or sound because it represents a substantial policy shift not highlighted in prior Regulation 18 consultations, therefore undermining due democratic process and public participation and because it goes against the Government's own regulations

*From s18 consultation :Much of the undeveloped land adjacent to existing settlements in suburban and rural areas adjoins farmland of the best and most versatile quality. There are also large areas designated of international and national environmental importance. In considering potential development allocations in suburban and rural areas, the Council acknowledges the need to conserve and enhance the important habitats and landscapes, and to plan at an appropriate scale to support effective infrastructure delivery. In defining options, the Council has considered all potential locations, including land in the Metropolitan Green Belt.*

**There is no mention of reclassification.**

The decision appears to be heavily reliant Gravesham's desire to build on the land, citing the duty to cooperate. However, as it stands, the land is currently designated green belt and protected from development. Until such time as the Local Plans of both Medway and Gravesham have been approved, no such development should be considered.

Annex 2 of the National Planning Policy Framework (NPPF) defines Grey Belt Land as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to any of purposes (a), b or d

It should be noted that Gravesham has “grey belt” sites within its own boundaries such as the abandoned hospital which has been empty for many years, and the now derelict Tollgate Motel.

In contrast, none of Strood’s green belt has been previously developed and it strongly contributes to purposes a,b and c.

- .
- (a) to check the unrestricted sprawl of large built-up areas;
  - (b) to prevent neighbouring towns merging into one another;
  - (c) to assist in safeguarding the countryside from encroachment;

By the council’s own admission, this is good quality, productive farmland  
*“Much of the undeveloped land adjacent to existing settlements in suburban and rural areas adjoins farmland of the best and most versatile quality.”*

It is not “grey belt” and should be protected.. If it is reclassified, the very slim border between Gravesham and Strood will be lost forever.

There are therefore no exceptional circumstances to support reclassification.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Do not reclassify Strood’s green belt.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

## **Objection to the proposed housing development on land north of Rede Court Road, parcels 1 & 2**

We are writing to express our very strong objection to the proposed housing development in our neighbourhood on the land north of Rede Court Road currently showing access via Clinton Avenue & Beaufort Road, the increase in population density would put a strain on our already overburdened infrastructure, leading to increased traffic congestion, noise pollution, and strain on our public services, additionally, the construction of this project would result in significant environmental damage, destroying natural habitats and putting wildlife at risk, it would also drastically alter the aesthetic of our area, replacing the existing greenery and open spaces with high density housing complex.

Why does it have to be accessed through these quite residential roads, surely it would be far easier to access via the Gravesend Road as it is much wider and safer and easier to go straight onto the bypass for all the Medway town / A2 for London or the coastal directions, this would alleviate all that traffic going through what is currently quite residential roads.

Can you not use Clinton Avenue & Beaufort Road as a pedestrian / cycle access route onto the proposed new development, this would keep the traffic congestion away from Rede Court Road.

Whilst we understand the need for more housing surely it should not be built on working farmland as we need all our farmland to feed our ever-growing population.

Our Objections are :-

- These roads were not made with the intention of all the additional traffic that this would cause i.e. width of road was only made for the houses currently in the dead end roads (no through traffic) the A289 bypass was built to stop the gridlock on our local roads, by allowing this housing development to go ahead the gridlock will return.
- The land in question is valuable agricultural land, which should be kept for this purpose, we need to grow our own food, if we keep taking our agricultural land we will be reliant on other countries for our food which will be totally unacceptable.
- Medway Council should prioritize the building of new homes on brown sites until they are all exhausted before building on our agricultural land, which is not the case at present
- The proposed building on green belt is a major change away from Medways green belt policy, we are referring to page 62 of the green belt review, to date this has not been clearly flagged to the general public
- The green belt review has been recently critiqued by an independent consultants, why has this not been made public.
- We already have issues with residents not being able to get Doctors / Dentist and schooling, these are already passed breaking point, adding more houses to this area will have devastating consequences.
- With the added vehicles from this site would have grave environmental implications, higher levels of air, noise and light pollution, this should all be taken into account.
- These houses would have a big impact on commuters working out of this area in relation to the train & bus travel.
- Why does it have to be accessed through these quite residential roads, surely it would be far easier to access via the Gravesend Road as it is much wider and safer and easier to go straight onto the bypass for all the Medway town / A2 for London or the coastal directions, this would alleviate all that traffic going through what is currently quite residential roads.
- Can you not use Clinton Avenue as a pedestrian / cycle access route onto the proposed new development, this would keep the traffic congestion away from Rede Court Road.

- Whilst we understand the need for more housing surely it should not be built on working farmland as we need all our farmland to feed our ever-growing population.
- With the current view on mental health issues in our country, we need to keep the green belt around our homes for our mental wellbeing.

Mr Keith Best & Mrs Lesley Best

**F**  
ME2

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Fw: Article 4 needed for Medway to restrict HMO namely 131 Hamelin  
**Date:** 10 August 2025 09:10:51

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Dear Sirs

It has been identified very recently that some or maybe most of Medway does not have an Article 4 in place as part of their planning policies.

I strongly believe that there is a need for Medway to adopt Article 4 going forward.

This Article 4 would then restrict the likes of HMO applications, as would not then be able to put LCDs in like the one we are facing with in Darland, namely 131 Hamelin.

With kind regards

Mr Gordon Smith  
[REDACTED]

[Sent from Sky Yahoo Mail for iPhone](#)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan  
**Date:** 10 August 2025 11:26:22

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Good morning,

With reference to the above, until all infrastructure is in place to support these developments they should not happen.

The current infrastructure cannot support what is here now so in no way can it support what is planned.

This whole plan should be scrapped.

Brian Annenberg

## **Comments on Medway Local Plan 2041 Proposed Submission Draft, Regulation 19 June 2025**

### **Background**

I am making comments on my own behalf. I am aged 75 and was born in Gillingham in December 1949 and have lived for most of my life in the Medway Towns. My family moved to the current house where I live in Maidstone Road, Rainham, in 1961. Apart from when I was at University between 1969 and 1972, I have lived in the same house ever since.

I attended the recent consultation meeting in the Millennium Centre in Rainham and picked up the relevant Consultation Document. I have also downloaded the full Local Plan document from Medway Council's website, together with some other documents. I am submitting a number of comments with my views, mainly on environmental and transport matters, in which I have a particular interest. I should note that I do not own a car, so I am dependent on public transport for travel within the Medway Towns and beyond. I used to commute to London by train and still travel regularly on the services to London.

Within the Medway Towns I use the bus services on a regular basis, particularly for shopping. Once or twice a week I get the bus to and from Hempstead Valley and I also use it to travel to other destinations within the Medway Towns, including Rainham and Chatham. The bus services I use on a regular basis are the 116 (most often), the 113, 130, 132 and 783.

### **Comments on Strategic Objectives**

I agree with much of the sentiments contained in the Vision for Medway as set out in Section 2.1.

However, I am not sure about the accuracy of the references in the paragraph that begins 'Improved travel choices and infrastructure', in particular the claim that it has reduced the use of the car across Medway. Where I live in Maidstone Road, Rainham my feeling is that over recent years car traffic has increased rather than reduced. And is air quality really better? On some still days the air does seem to be polluted and I understand that there are hot spots in the Medway Towns eg in Rainham High Street (one of Medway's four Air Quality Management Areas – see Section 4.10.5) where there remain concerns about air pollution.



Also I query the reference to a better public transport offer. Where I live in Maidstone Road, Rainham the bus service is now limited to the 116, apart from a couple of journeys on the 130 in the afternoon. A few years ago the frequency of the 116 was every 20 minutes, while it is now every 30 minutes in the morning and the frequency of services in the afternoon is around every 70 minutes. Also Maidstone Road used to be served by the 700, providing a quick service to Chatham and thence to Bluewater, but this service was cut back to starting from Chatham, so we no longer benefit from this service. I also have to say that on occasions the 116 does not turn up, which can be irritating – this recently happened on two successive Mondays when I attempted to catch the service. Accordingly, I have raised this particular issue with my MP, Naushabah Khan.

Also the frequency of the 132 service was a little while ago reduced from every 12 minutes to every 15 minutes. I do use the 132 from time to time eg travelling between Rainham and Hempstead Valley or returning home from Hempstead Valley if there is no 116 scheduled.

On the other hand I do welcome a couple of relatively recent developments regarding the 132: a more frequent service in the evenings and on Sundays. In addition, I note that quite recently the 113 service from Chatham to Wigmore, which I use from time to time, has adopted a more regular timetable eg at the same time every hour, which makes it easier to remember when it is running, and I welcome this.

In general, I would ask that there should be a commitment to supporting public transport, especially buses, for travel within the Medway Towns, and encouraging its greater use. In this context I think I would like to see a commitment for the current level and frequency of bus services to be at least maintained and that there should be no further cuts in services.

I welcome the references on page 18 under the section ‘Prepared for a sustainable and green future’, including the references to securing the high-quality natural and historic environment for future generations.

On the second paragraph relating to transport I generally welcome this, including the references to improved opportunities in the Medway Towns for walking and cycling and enhanced public transport services (presumably buses) and I do hope that these result in improvements in air quality.

## **Chapter 4 Natural Environment**

I welcome the comments in the Introduction (Section 4.1). I would point out that it is important to conserve the natural environment, especially the green spaces, that exist in the Medway Towns. When we moved back to Rainham in 1961 much of what is now Parkwood was green space and that of course has virtually all been lost. I frequently visit friends in Sheffield and note that there they have a wealth of green space that can be enjoyed by the local residents. My experience is that there is much more green space there than is the case in the Medway Towns. So, any loss of green space, as for example is proposed in the Capstone Valley, is not to be welcomed.

In fact one of my main concerns about the Local Plan is that the natural environment will suffer as a result of some of the proposed developments, especially those relating to housing as in the Capstone area and the proposal for 750 homes in the Lower Rainham area.

Paragraph 4.5.2 includes a reference to ‘the orchards running across the northern bank of the estuary provide an attractive and productive belt separating Rainham from Gillingham’ and there is also a reference to the orchards east of Rainham. I strongly support the maintenance of these orchards as a particularly attractive part of the Medway environment and I hope that every effort will be made to maintain them and not to allow housing to be built on the sites of these orchards. Incidentally my garden includes several apple trees and soft fruit bushes, and I appreciate their value, as indeed do the bees and other insects.

Paragraph 4.8.9 says that Medway is ‘an area of serious water stress’. All the new homes proposed in Medway will presumably add to this stress. Are there adequate supplies of water in the country to meet this extra demand? In my view water privatisation in England has been a total disaster and there have been no new reservoirs in this country for over 30 years. Like other customers with Southern Water, I have experienced this year a huge rise in the amount I am paying for my metered water supply. I hope that Medway Council will insist that Southern Water takes steps to ensure that it is making adequate provision to meet the future needs of the Medway Towns as set out in the Local Plan.

I note Policy DM3: Air Quality and support any proposals designed to improve the air quality in the Medway Towns.

## **Chapter 6 Housing**

On the subject of older persons accommodation (see section 6.4) I agree that offering older people a better choice of accommodation to meet their changing needs can help them live independently for longer (6.4.18). In this context I think it is important that there should be a sufficient supply of bungalows as elderly people particularly appreciate living in a bungalow with the absence of stairs. For example, my mother in the last year of her life had arthritis which severely restricted her mobility and it was lucky that we lived in a bungalow – if we had lived in a house it would have been very difficult, if not impossible, for her coping with stairs. I know that very few new bungalows are being built, but I think there should be provision for at least a small number of new bungalows in the new housing being planned in Medway.

## **Chapter 8 Retail and Town Centres**

I regularly use Rainham and Hempstead Valley for shopping – in the past I also used to go to Chatham, but I now go much less frequently as several stores that I used to frequent there eg Marks and Spencer, the Co-op and Alders (more recently Debenhams) have now closed.

On section 8.11 I note that in the past there used to be two or three greengrocers in Rainham but now there are none, so the return of a greengrocer would add to the Centre's attractiveness, particularly as Hempstead Valley also does not have a dedicated greengrocer. I should add here though that an important part of the shopping facilities in Rainham are the butcher and the fishmonger (both of which I use regularly) – many similar shopping centres no longer have a butcher or a fishmonger.

On section 8.13.1 I note that Hempstead Valley will be a key retail area supporting the Lidsing housing project. In this context I would like to see from an early stage of the Lidsing development that there is a public transport (bus) link to Hempstead Valley, either a new route or a modification of an existing bus route (see also my comments in Section 9).

## **Chapter 9 Transport**

Paragraph 9.1.2 refers to the Lower Thames Crossing. I was personally disappointed that this was approved as it is only going to add to car traffic, including in the Medway Towns. Having said that, as the Government has now approved it I would expect it to bring a stimulus to local economic development and I would have thought new economic projects in the area should be concentrated around the site of the Lower Thames Crossing and its road links.

On the box 'Vision for Access and Movement in Medway' I have a number of comments to make. With reference to an improved public transport offer, I welcome this but would point out that for elderly people like myself then short journeys can be just as important as longer journeys. I have had mobility issues over the last year or so and being able to take the bus for short journeys of just a couple of stops has been helpful to me. And I note other elderly people, sometimes who have much more restricted mobility, also use the bus for short journeys.

In the next paragraph in the box there is a reference to other credible transport choices. I would strongly suggest that e-scooters should be removed from this list. Currently they are not a legal mode of transport in the Medway Towns, but I still often see e-scooters being used illegally. I don't mind too much when they are on the road, but when they are on the pavement they are often travelling at excessive speeds and are a potential danger to pedestrians. From personal experience I find it very disconcerting when one whistles by me and I am glad that I didn't move just before that – you cannot hear them coming. And only this week there was the story in the news in connection with a man in Rochester who was killed in 2023 when he went out onto the pavement and was knocked down by a man on an e-scooter.

Paragraph 9.1.7 refers to electric public transport and I assume this refers to buses rather than trains. I very much welcome the use of electric buses and have used these both in London and in Cambridge. However, as far as I am aware there are no electric buses yet in use in the Medway Towns, which I find rather disappointing. Hopefully it will not be too long before electric buses make an appearance locally, and perhaps the Council could encourage Arriva, the biggest operator of buses in the area, to bring forward plans to introduce electric buses in the area.

I have a couple of observations about bus services that I would like to make. As I mention in Section 8, I think that from an early stage there should be a bus service from the Lidsing development to the Hempstead Valley Shopping Centre. This might be a completely new service, or a modification of an existing service. I think there should also be a link from this large development to Rainham station for those likely to commute to London or elsewhere in the Medway Towns. Perhaps a service from Lidsing to Hempstead Valley and then Rainham Station might be an option.

Some of the local bus services eg the 113 and 130 are supported by Medway Council and I think Kent County Control contributes to the support for the 130. In addition, if a new bus service from Lidsing to Hempstead Valley and beyond requires financial support, at least in its early stages, then I think Kent County Council (or its successor under any local government reorganisation) should be asked to contribute towards this financial support.

I would support the suggestion in Paragraph 9.3.2 for a new riverside crossing (if economically viable) and especially a new riverside path.

Paragraph 9.3.5 refers to the Local Cycling and Walking Infrastructure Plan (LCWIP). I would just like to mention in this context that I participated in the consultation last year on the LCWIP and made a number of comments opposing Cycle Route 2 in Maidstone Road, Rainham. While there are a number of schemes under the LCWIP that are worth pursuing for the benefit of both cyclists and pedestrians, this was definitely not one of those. In the consultation 46 per cent of the responses to the LCWIP were about this particular route, and as Appendix D to the Report showed a substantial number of people strongly disagreed with various aspects of this route. Hopefully this scheme will be dropped from the LCWIP as it goes forward.

Section 9.4 refers to the Grain Branch of the railway – I hope that in the longer term it might be possible to reinstate passenger services on this branch and also that it might be possible to stimulate greater freight usage on this branch line. I note that paragraph 9.4.3 says that this is the only opportunity to significantly increase rail passenger capacity in the Medway Towns. As a regular rail user, now primarily for leisure purposes, I have to say that overall I am pretty satisfied with the rail services provided through the Medway Towns to London. One point though is that I do not see why passengers should continue to pay significantly more to use HS1 to travel to London – the only fast section is from Ebbsfleet International to St Pancras International.

Paragraph 9.9.2 says that ‘the pedestrian should be the focus of street design’. This seems an admirable comment. That is all very well but on a number of streets, including Maidstone Road, Rainham, this is not the case with poor-quality pavements and often there are cars parked on pavements, sometimes quite badly parked, which make it difficult for pedestrians and especially those on mobility scooters, to get past them. I realise that there is currently no law to prohibit parking on pavements so this is a difficult problem to address.

On paragraph 9.10.2, as I indicated in my comments earlier in this section, I recommend that the reference to e-scooters should be removed as they are a danger to pedestrians and do not contribute to shared mobility. And in the box T26 the reference to e-scooters should also be removed.

On Policy DM20, about cycle parking and storage, I would just like to support the idea of proper facilities for people to park their bicycles. I would not like the situation to arise in the Medway Towns that occurs in parts of London where bicycles on hire are occasionally left in inappropriate places on the pavement, making it much less attractive for pedestrians as they have to walk round these abandoned bicycles and present a threat to pedestrians who are visually impaired.

The final sentence of paragraph 9.12.8 refers to the impact of those parking on the pavement. In some cases they park in such a way that it is difficult to get past the vehicle. As I mentioned above, those using mobility scooters are among those affected by bad parking and I think they should be added to the list of those affected by obstructions. Where the road is sufficiently wide then perhaps parking on the pavement might actually be banned.

I would suggest deleting paragraph 9.12.17. I see no need for an e-bike and e-scooter hire system – see also my earlier comments about e-scooters.

## **Chapter 14 Site Allocations**

On the specific proposals in this chapter I recognise that there is need for more housing in the Medway Towns. However, I am concerned in particular about the extent of the proposals for houses in the Capstone Valley (Section 14.8) and Lower Rainham (14.11) and the effect this will have on the natural environment and the loss of green spaces in these areas.

On the Capstone Valley there is a reference in the Summary Booklet saying ‘A connection between North Dane Way and M2 Junction 4 will provide for an orbital bus route’. As I pointed out to one of the Council staff at the exhibition event that I attended, you cannot terminate a bus service at a motorway junction! There definitely though should be proper public transport provision for such a large development, including from the earliest stages of development, possibly based on expanding or amending the existing 113 service from Chatham to Wigmore via Hempstead Valley.

I particularly oppose the proposal for suburban development in Lower Rainham (14.11). Currently the railway line provides a natural break between Rainham and the orchards and other agricultural land to the river, and I think it would be a big loss if this were to go ahead. I note that Medway Council rejected a planning application for 1,250 new homes in this area in 2020 and I think this was the right decision, as confirmed by the inspector a year later. Even though the development now envisages fewer homes (750) this is still a substantial number and will lead to a significant environmental loss. If though the Council does go ahead with this in the Local Plan there will be a need for proper public transport links (not mentioned in the document) – Lower Rainham does not have good bus links, so there will need to be a significant improvement in the provision if this development goes ahead.

Henry Langley



10 August 2025

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Draft local plan re Rainham Parkside Village, Lower Rainham  
**Date:** 10 August 2025 13:27:43

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I believe that the above site is unsuitable for development and should be removed from the local plan. It is only a few years since this was deemed totally unsuitable on a number of grounds for development at both local council and national government level including being totally unsuitable in the area for the increase in traffic.

Whilst the new proposal is for less homes it does now include both a primary and secondary school and medical centre. It is a waste of time to build a medical centre, as my own practice, according to recent conversation I had with the practice manager, has four vacancies for GPs she cannot fill, so it does beg the question, where the GPs are going to come from for this building?

Also, whilst there is a reduction by 500 homes, given two schools in their stead with presumably a thousand plus pupils and that more and more parents take their children to school by car than in days gone by, this surely going to bring even more traffic to the area than the previous proposal that was deemed totally unsuitable. I already witness every winter at one of the two existing schools Thames view primary, the other being Rainham Mark, parents arriving up to one hour early to pick their child up and get the most advantageous parking space and then to keep warm whilst waiting to collect their child, leave their engine running whilst sitting waiting in their car for the whole hour. Repeat this with two new schools in the area and the environmental damage in addition to the increase in local traffic far in excess of the previous plan, clearly shows that this is even more unsuitable than the previous one and I hope the inspector will reject this as a totally unsuitable site for development as was already found with the previous plan, which would have produced even less traffic in the area with no infrastructure to cope with an even larger increase than was proposed before. Schools will generate more traffic than the homes that have been reduced in number. Clearly even more unsuitable than the previous rejected proposal.

Gary Teague

[REDACTED]  
[REDACTED] ME8 [REDACTED]



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Draft local plan re Rainham Parkside Village, Lower Rainham.  
**Date:** 10 August 2025 13:39:52

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I think that the above site is totally unsuitable for development and should definitely be removed from the local plan. It has already been deemed as unsuitable on a number of grounds and this was only a few years ago.

I can see that the plan is for less houses but it also includes the building of schools etc. This will definitely cause a huge increase in traffic and the local area will not be able to cope with this.

Abi Teague

[REDACTED]  
[REDACTED] ME8 [REDACTED]

Sent from [Outlook for Android](#)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Comments re: Medway Local Plan 2041  
**Date:** 10 August 2025 14:56:35

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Dear Sir/Madam

**Objections to the Medway Local Plan 2041 as follows:-**

**1. Legally Compliant - SNF1 and SNF3 - we feel that the Local Plan is not Legally Compliant as it fails to protect the Green Belt from development, explicitly the Green Belt's main purpose is to prevent Urban sprawl and keep separation between towns and also to protect some natural habitats. Both these parcels of land are currently being used for agricultural purposes.**

**2. Sound -SNF1 and SNF3 - these are protected areas of land and no exceptional circumstances have been demonstrated to release the land for housing development.**

**3. Complies with Duty to Co-operate - in our opinion it is unclear whether cross boundary co-operation between neighbouring authorities or local communities has been carried out. We feel it has not been demonstrated in the Local Plan as our neighbouring authority is not going to release their Local Plan until after it has gone out to Consultation later this year.**

Having attended two of your 'Medway Local Plan' events and having now read through the Summary Booklet we would like to make the following comments relating to the proposed house building on Green Belt Land.

The Green Belt Land that has been included in the plan for house building has now been designated as Grey Belt. We do not feel it is in keeping with Central Government's definition of Grey Belt as our understanding is that Grey Belt land was land that had previously been built on within the Green Belt. This is not the case with the land to the north of Brompton Farm Road which has previously been rejected for house building due to it being a working farm.

The government's view was that all Brown Field sites should be built on first before Green Belt land is used - the Local Plan does not demonstrate that all Brown Field sites have been considered first for development.

The Local Plan states that Medway has just under 5% of Green Belt land - surely this should be protected for the health and wellbeing of residents.

We feel the amount of house building being proposed in the Local Plan would negatively impact on all road networks within Strood. So many of the roads are gridlocked now - especially at certain times of the day. The Local Plan does not appear to show any new roads - especially the route out of Strood to the Hoo Peninsula.

The Local Plan does not show any provision for a new hospital - a 'Health Hub' in Strood is not an adequate provision unless it is in addition to a new larger hospital.

The access roads to the North of Brompton Farm Road are proposed to be onto the A226 and

another one at the junction of Cliffe Road, Brompton Farm Road and Stonehorse Lane. This is already a very busy junction especially at certain times of the day and close to a school and also a bus stop where the school buses pick up and drop off.

We understand all the Utility Companies have said they have no objection to the extra housing as they can supply the extra capacity. This we find surprising as Southern Water objected to a previous application in 2018 saying they could not meet the demand for sewage and there was a risk of flooding in the north-west corner of the previous application. The water companies are unable to cope with the amount of sewage now. Already raw sewage is being discharged into our waterways and only recently Steve Reed, the Environment Secretary, has stated that the water companies must reduce their sewage discharges by 50% by 2030. As we only have one sewage treatment works in Strood the extra capacity that will be needed for all the extra housing being proposed in the Local Plan needs to be built before the houses.

Yours faithfully

Mr John Leigh and Mrs Shirley Leigh

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Potential Development on land north of Watling Street, Rede Court Road, and Brompton Farm Road.  
**Date:** 10 August 2025 16:10:46

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Firstly, I broadly support the Local Plan in principle, however I wish to oppose certain parts, particularly Policy SA6 (affecting Strood West) due to the following concerns:

The land, which was originally designated as Green Belt, has now become Grey Belt. How was this allowed to happen? Apparently there were independent consultants looking at this issue, but there are no minutes to indicate how the judgement was reached. If the land has been re-categorised as inferior now, you may be interested to know that the farmer has just cut down his field (of wheat this year), which has grown well. Changes in the designation of Green Belt should apparently (according to the National Planning Policy Framework) only happen in "exceptional circumstances". Does this proposed development constitute exceptional circumstances?

The infrastructure is struggling now to support those of us who live in the area - particularly with reference to flood defence, sewage blockage, GP surgeries, hospitals, school places, etc. How can we accommodate all these new residents? Also, the local roads that have been proposed as an access road for one of the developments are struggling already. I live on Fountain Road, and if all the traffic to the new development will be directed through Carisbrooke Road and Beaufort Road, the roads will not be able to cope, and it will be extra hazardous for those of us who live here.

Having the extra residents in this area will lead to long term environmental damage and poor air quality, There will be a detrimental impact on the quality of life of those of us residents who live next to the construction area as the works are in progress.

There is a pipeline running under the field north of Rede Court Road and beyond. It does not seem as though this has been taken into consideration at all regarding the proposed development which will result in strain due to the excess weight during construction and with the extra traffic resulting from the development being put on to it. How safe can that be?

If Gravesham cannot commit to its share of extra housing, why does Medway have to come to its aid? It seems very unfair on us residents.

In conclusion, it seems to me that the needs of the residents of Medway are not being considered, and that those of the developers are being put uppermost, and considered to be of more importance.

I look forward to your response

Yours faithfully

Marilyn Hawkes (Ms)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Public Comments on the Medway draft local plan 2041  
**Date:** 10 August 2025 16:29:04

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Kindly forward my submission to the Planning Inspectorate.

Regulation 19 Consultation Submission.

Contributor: Mr J W Brewood, [REDACTED].

Date: 09th August 2025.

Submission pertains to: Draft Medway Local Plan 2041 (Regulation 19 July 2025) Section 9.7 Aviation. Policy T23: Aviation.

Rochester Airport will provide an enhanced aviation facility for business, public service, training, heritage and leisure uses and support the development of a strategic gateway and an economic hub.

To The Government Inspectorate.

Policy T:23 should be withdrawn from the Draft Medway Local Plan 2041. There is no trusted evidence or identified need for an economic hub that stands unfinished, idle and redundant. This folly to date has cost the taxpayer £40 million, which the council cannot recover.

No consultation is undertaken on safeguarding non-essential aviation. This will impose on the unwitting ratepayer heavy financial responsibilities and further losses we know nothing about, and conflict with environmental law for no economic or community benefit.

The plan provides no solution to reduce carbon deposition or to utilise publicly owned property to meet environmental regulations and provide a sound new Local Plan that benefits this community and improves public safety.

Rochester Airfield could not be more perilously and inappropriately located by design. The 110-hectare site is dangerously located next to large residential and national retail outlets. The airfield is surrounded by 17 schools perilously located within a one-mile radius of the site.

All flights in and out of the airport dangerously run perpendicular to the M2 eight-lane motorway and overfly the nearby schools and the North Downs Area of Outstanding Natural Beauty.

Due to the negligence of the landowner, the Medway Council has never carried out any risk assessments for public safety or the environment since the airport opened in 1933, despite significant demographic shifts.

No noise reports comply with the National Planning Policy Framework.

This is intended to establish. SOAELs and LOEALs. The council removed the bund that they had promoted would reduce noise levels.

NPPF Section 9 par 109(a);(c);(f) with specific weight towards not avoiding and mitigating adverse effects or supporting environmental gains.

In collusion with Tonbridge and Malling Borough Council and the airport operator, the leasee is Rochester Airport Limited. Major land works and land use changes were proposed and granted planning permission based on lies and misinformation given to residents and SELEP.

Namely, subject to successful planning permission, all flights in and out will be capped. The councils, without any unbiased, dependable evidence, promised that the planning condition would reduce noise to lower levels than now and improve public safety.

The airport is forced to operate dangerously with a single 02/20 grassed runway. Due to land grab, three of the airport's runways have been decommissioned. This included 16/34 crosswind runway, which accommodated many of the unsophisticated home-based aircraft that are susceptible to strong winds.

The submission from Mr W Mcclenan, dated August 1<sup>st</sup>, 2025, provides a more informative and detailed presentation. However, should further clarification or supportive evidence be needed, my contact details are above.

Kind Regards

James Brewood

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Regulation19 Consultation  
**Date:** 10 August 2025 17:53:36

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Medway Local Plan 2041.

I made representations to what was to be the Local Plan up to 2035 on :-

February 26<sup>th</sup> 2016 Issues & Options

March 28<sup>th</sup> 2017 Development Options Reg 18

June 25<sup>th</sup> 2018 Development Strategy and

September 30<sup>th</sup> 2019 on Local Plan Documents had the Plan progressed.

Because my views remained the same on most issues I did not respond to the current Plan. I do however wish to add a few comments on the latest Draft Local Plan.

1.2 Medway area.

1.2.2 States:- The Council want's Medway to be a Healthy place to live, with clean air and green spaces.

How can this be achieved with all the extra Homes Medway is expected to accommodate?

Air quality in the Frindsbury and Wainscott area is not good now.

Water quality is also questionable.

Roads are congested.

And have lost many green spaces when the Wainscott By Pass was built, also footpaths and Manor Farm

Conservation land .

Green Belt.

I strongly object to Land Parcel's 3 and 4 in the Green Belt west of Stonehorse Lane being classed as Grey Belt. It is grade 1 and 2 Land. The outer route of the Wainscott By Pass was chosen so as to PROTECT the land in question LONG TERM from speculative development.

Para.142 of NPPF. States:- The Government attaches great importance to Green Belt. The fundamental aim of Green

Belt Policy is to prevent urban sprawl by keeping land PERMANENTLY OPEN which is the essential

characteristics, OPENNESS and PERMANENCE.

Para.143 Green Belt Policies Criteria serves 5 Purposes ABCDE .

All 5 should be upheld I feel as this area has already taken it's fair share of development.

NPPF Also sets out that Green and Blue Infrastructure Planning should include delivery of measures to address

local health and wellbeing and air quality issues.

The Local Plan may be considered legally compliant but I question it being sound.

Appears more Homes than Employment in the Plan.

Please don't forget Policy BNE2 Amenity Protection.

Kind Regards

Judith Masey.



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection to Medway Local Plan Regulation 19 consultation - SA6  
**Date:** 10 August 2025 19:06:32

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Hello, I'm Jessica Glover and I'm emailing about my concerns regarding the Medway Local Plan Regulation 19 because of the following reasons:

I agree there is a need for such housing but disagree with the part of the Policy SA6 - relating to Strood West- as I have major concerns regarding the people of Strood and surrounding areas.

To my knowledge, the Green belt area should not be used as housing areas as in Strood currently the green areas where people can walk and see nature and wildlife is reducing fast. As well as the fact that once it is built upon, there will be no return to its original state. Combining that with the fact that the National Planning Policy Framework includes within that Green belt boundaries should not be altered nor changed unless under exceptional circumstances. Under this same framework, the supposed Strood Grey Belt is incorrectly named so as it is used as Farmland and is used as a separating make between towns.

Furthering that idea, it is unclear why Brownfields and similar areas were not prioritised first over Strood's Green belt as they are surrounded with more extensive green areas than Strood is. Strood's wildlife variety is already depleting and in the current rate of climate change, the permission wants to strip more wildlife habitats and subsequently create an even hotter climate as you will be removing green spaces which counteract the impacts of emissions and CO2. The area you are planning to build upon is a few hundred hectares roughly, how is that fair to the people of Strood.

Moving on from the environmental damage it will cause, is the fact that Strood is already underfunded within the council and county. The infrastructure is inadequate to its current residents and the increased commuters on the roads will worsen this. Combining that with the fact that public transport is unreliable and frankly faulty as best, how is it fair to current residents and additional residents to worsen transport and infrastructure further. The strain it is under is already severe, why worsen it when funding is not guaranteed nor promised.

Additionally, talking more for the infrastructure of Strood and Medway in general, schools are at capacity with many having waiting lists for years. Same issue with hospitals, the waiting lists is longer than some people have to live and that frankly has to be addressed before more houses and people are added to such lists. I know many people who have had to turn to private health care and frankly that's unacceptable. Ignore the hospital wait lists, look at the GP's, the dentists and other health care professionals are all under the exact same stress due to the wait lists and the fact that they cannot serve people quicker than they are currently doing. How is that fair or just for them to be working stressful overtime hours to attempt to keep up with the ever growing rate of health care issues. The effect on their mental healths and their patients mental healths will be horrific worsening the issue of the wait times. Their wellbeing and mental health is not fair to risk further, especially with the current mental health crisis within the healthcare industry.

Another issue is that the Live Oil Fuel Pipeline which feeds Gatwick Airports aviation fuel. There is a major health and safety concern as any damage to this pipeline would have major consequences such as fire hazards, environmental contamination or even worse case scenario an explosion. The negative impact of increased building works and housing on said pipe is likely due to the age and location of the pipe. Why risk the livelihoods of surrounding residents to build houses which will clearly have an overarching negative effect?

Moving forward, there are some questions I personally have that have been left unanswered by the consultation and through the meetings to help Strood residents understand. A few of these are:

With regards to the meetings between Medway and Gravesham councils, why were the public not made aware prior to the meeting and why are the notes from the meeting not available to the public so they can see and understand what was discussed? This process has not had public approval and has been hidden in a way that is appalling to many residents, including myself.

Had a full traffic survey and impact analysis been completed and fairly assessed? As again the public have no knowledge of such processes happening.

My final thoughts on the matter are as such:

Medway Council is working far closer to developers rather its residents it serves, and the voices of residents are not being acknowledged whilst one of Medway's most important green spaces is being destroyed forever.

I strongly object to Policy SA6 - referring to Strood West.

Regards

Jessica Glover

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Cc:** [REDACTED]  
**Subject:** Medway Plan: Response to Consultation  
**Date:** 10 August 2025 19:35:06

---

I submit comments in response to the Council's Medway Plan consultation.

I have read the Medway Plan documentation and maps. I have discussed the Plan with a planning officer at a consultation event.

I appreciate the need for new housing. I broadly support the Plan. I recognise the challenges of drawing up the Plan against conflicting priorities and interests. I applaud the detail and extensive consideration of evidence and argument that has gone into the Plan and commend the authors for their diligence and expertise.

I do have two issues.

In the previous consultation papers there was mention of a possible cross-border very large housing development, with Tonbridge and Malling (TMBC), stretching across the west of Snodland up to the line of the western North Downs and into Medway, and beyond St Andrews Park, Halling along the A228. The current Medway Plan draft is silent on this proposal and I was told that the Council has no plan for such development along the A228. However I was told that TMBC is also developing its Plan and that it was not known if TMBC would still include such a proposal. Whilst I am relieved that Medway is not including such a proposal in its Plan, I would be very concerned if TMBC still did so.

The A228 running north and south along the Medway Valley is a road under severe stress and promises to be even more so if the Lower Thames Crossing proceeds, even forecast to do so in the Highways Agency's own projections. Any roadworks or accidents along the A228 between Snodland and the M2 can snarl up the A228 for long distances and Halling becomes blocked by vehicles attempting to take a short cut round the congestion. I live in Halling High Street, at the extreme south end, and regularly suffer such congestion, even taking sometimes up to fifteen minutes to progress a half a mile south to my house because of the narrowness of the High Street into a single vehicle width at two places and meeting a constant stream of traffic short-cutting coming south. Any large housing development anywhere along the A228 Medway Valley would place yet more stress on the A228 and Halling village.

This is notwithstanding that such intensive development would permanently change the wonderful heritage landscape of the western North Downs and western side of the Medway Valley, and would be abhorrent loss of such heritage landscape.

Whilst the Medway Plan is silent on this proposal and I was told Medway did not support it, I urge the Council to include a statement in its own Plan that it does not support such a proposal and would rigorously object to such if included in the TMBC Plan.

My second issue concerns developers renegeing on promises in their planning applications. The Medway Plan will be a series of aspirations. It will require developers to come forward to translate those aspirations into planning applications. Too often developers make promises in their applications and then renege. I should like to see mention in the Plan that Medway will hold developers to commitments made in planning applications and will enforce them where possible, to the cost of the developer.

I cite two actual examples as evidence of developers reneging. In Medway itself, the St Andrews Park, Halling, Redrow planning application originally promised a playing field and doctors' surgery. The development is completed and neither has come about. I accept a surgery requires agreement of the health authorities and this has not been forthcoming, relying on the existing Halling surgery to cope, but why was Redrow allowed to include it in attempting to attract buyers for the development?. The playing field however has been lost to the developer maximising its profit from using all the land for houses. The developer should have been penalised for this omission. My second example is from across the border in Peters Village, a large development of over a thousand houses and apartments. Again a doctors' surgery was promised and also an improved bus service to that previously existing as an hourly service between Chatham and Maidstone. In fact that bus service has been lost all together, leaving local elderly residents in Wouldham, Burham and Peters Village with no public transport. The land for a doctors' surgery is still there, labeled as such, and it was for the stretched small surgery in Burham to relocate there, centrally for Wouldham, Peters Village and Burham. However, the developer, Trenport, demands such a high rent for a proposed surgery that the doctors at Burham cannot afford to move to Peters Village. The developer should have been required to charge a reasonable rent to enable the move. I accept these are examples from a TMBC development, and not Medway, but they are classic as examples of a developer not fulfilling the promises made in its application. I should like to see the Medway Plan include an assertion that developers will be obliged to deliver on their application promises or the Council will take enforcement action.

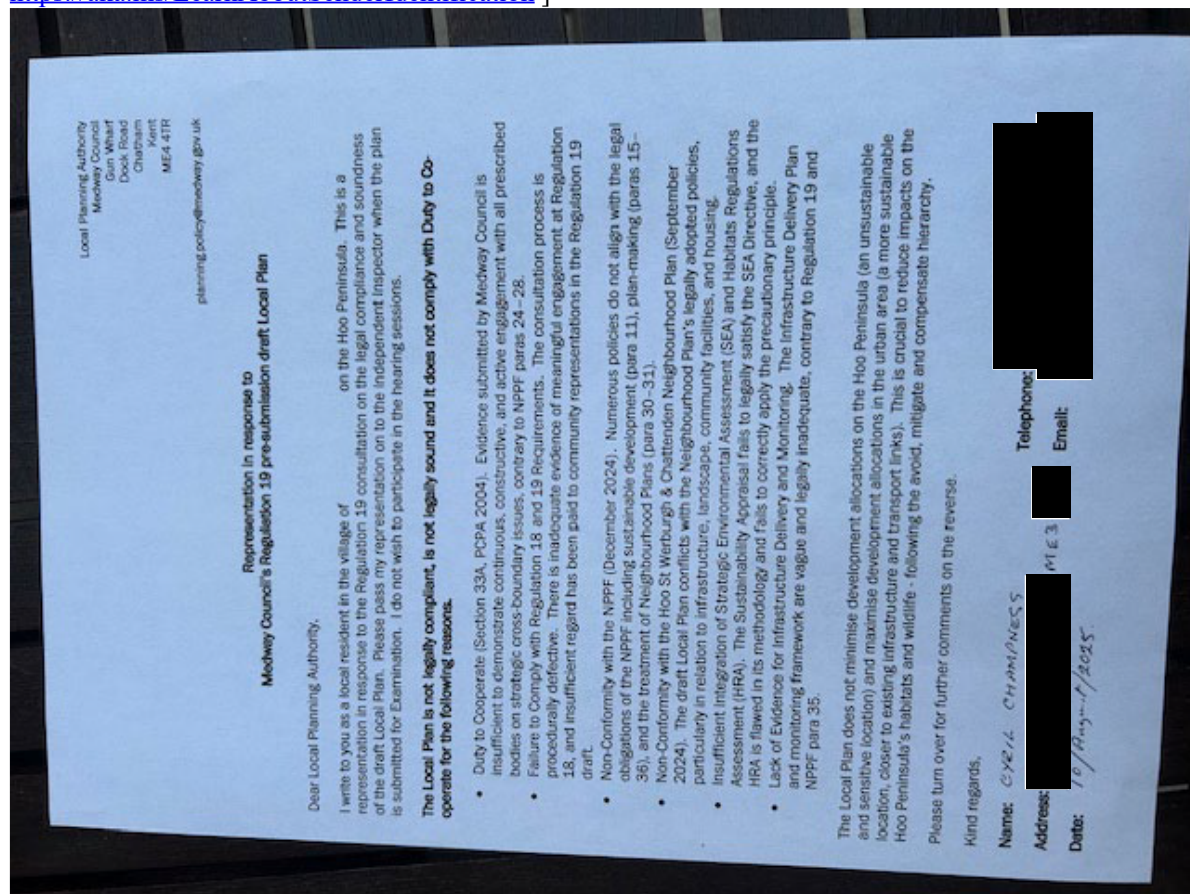
***Philip Badman***

**[Redacted]**

ME2 **[Redacted]**

**From:** [Cyril Champness](#)  
**To:** [policy, planning](#)  
**Subject:** Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan  
**Date:** 10 August 2025 20:36:31

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Sent from my iPhone

Local Planning Authority  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR  
planning.policy@medway.gov.uk

Representation in response to  
Medway Council's Regulation 19 pre-submission draft Local Plan

Dear Local Planning Authority,

I write to you as a local resident in the village of Hoo St. Lawrence on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination. I do not wish to participate in the hearing sessions.

**The Local Plan is not legally compliant, is not legally sound and it does not comply with Duty to Co-operate for the following reasons.**

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24-28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15-36), and the treatment of Neighbourhood Plans (para 30-31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: TUS HAZEL CHAMPNESS

Address: [REDACTED]

Date: 10th August, 2025

Telephone: [REDACTED]

Email: [REDACTED]

Tab 1



Kevin Price

[REDACTED]

[REDACTED]

ME2 [REDACTED]

10/8/2025\_

Dear Sir/ Madam

I am writing to formally object to the land north of Beaufort Rd and west of Rede Court Road Strood crossing over the border to Gravesham .

This land is as written in the Medway and Gravesham Greenbelt review from 2018 and forms a small divide between

Gravesham / Strood, it provides grade 1 farming land and is also essential for habitats for various species .

### Core Reason for Objection:

Since it's been announced that Green belt can be used and downgraded to grey belt councils, developers are abusing this without any consultations taking place .

In 2018 Medway Green belt review stated that it was serving its purpose .

The downgrade to grey belt is contrary to NPPF guidelines .

The Greenbelt policy change—impacting Strood—was not made publicly available until the Council's agenda papers were released on 26 June 2025. This is a substantial policy shift not highlighted in prior Regulation 18 consultations, and therefore undermines due democratic process and public participation.

Premature and Uncoordinated Policy Change:



Medway Council pushed forward with its plan before Gravesham Borough Council had finalized its own Local Plan and Greenbelt

*In the king's speech 2024 Starmer stated:*•

*Grey belt development: Creating a new category called "grey belt", which would prioritise development in "grey and ugly areas of the green belt".*

*Labour stated that "wastelands and old car parks located on the green belt" should not receive "the same protections in national policy as rolling hills and nature spots in the green belt".*

*This is only one of many policy's documents the Labour Party have mentioned grey belt and its description. Paragraph 153 of the new NPPF also says inappropriate development is by definition harmful to Green belt and should not be approved except in very special circumstances.*

Therefore, just as before, LPAs need to weigh the potential harm to the Green Belt when making planning decisions and very special circumstances will not exist 'unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations!'

The parcels of land are grade 1 farming land . It is not as described above classed as grey belt .

2.2 Greenbelt national policy mentions,

Prevention of urban sprawl,

Prevention of towns merging . It also mentions the movement of boundaries to happen only in

exceptional circumstances .

I ask why these recommendations in many of the council's policies and documents are possibly being ignored ?

The impact on local residents will be huge , additionally it raises concerns for strain on infrastructure and the increase in traffic congestion. I doubt it can withhold any more pressure and will be irresponsible to think it can . The roads in and out of Medway and into Gravesham are often clogged and many lives have already been lost . This plan is not a sound plan .  
?

### **Opaque Evidence:**

**Section 14.10.5 refers to a joint “high-level masterplan” with Gravesham, yet this document is missing from the evidence base. Without access to such foundational planning material, public and inspectorate evaluation is compromised.**

**Gravesham regulation 19 is planned around December .**

The influx of new residents will overwhelm our Schools which are already full and our health care facilities cannot offer the service they should because they are so oversubscribed.

A plan of a medical hub in the Chatham Pentagon is not a solution to the demand for pmedical services in fact placed on a second floor in a town center with daily crime is not sufficient or suitable .

Ultimately this plan will diminish the quality of life for many residents whom of many are elderly in this area .

The extra traffic will in effect cause more emissions and pollution in an already over polluted area .

My recent house searches referred to a surface flooding risk . This could impact mine and others properties in the future should more housing be placed near . This with the damage to the wildlife is irresponsible and irreversible .

The updated national planning policy framework (NPPF) commits to a “brownfield first” strategy, with disused sites that have already been developed in the past prioritised for new building.

Again I mention the parcels SNF1/2 are prime farming land as again identified in the Medway green belt review 2018 .

I urge you to reconsider this proposal and engage with the community to explore alternative solutions so as to preserve our green belt for future generations

.

I declare that this reflects my genuine objections to the plan .

I look forward to your response

Tab 2

---

Kevin Price

[REDACTED]

Me2 [REDACTED]

[REDACTED]

9/8/2025

Planning Department

Medway Council

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Subject: Formal Objection – Proposed Reclassification and Jurisdiction Transfer of Land North of Beaufort Road and West of Rede Court Road, Strood

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Dear Sir/Madam,

I am writing to register a formal objection to the proposed reclassification and transfer of the land north of Beaufort Road and west of Rede Court Road, Strood, into Gravesham's jurisdiction and its potential downgrading from Green Belt to "Grey Belt."

This objection is submitted in accordance with the Town and Country Planning Act 1990 and the National Planning Policy Framework (NPPF).

---

## **1. Designation and Importance of the Site**

According to the Medway and Gravesham Green Belt Review (2018), this land:

- Forms a critical strategic gap between Gravesham and Strood, preventing urban sprawl.

- Is classified as Grade 1 agricultural land, denoting the highest quality farmland in England.
- Provides essential habitats for multiple wildlife species, supporting biodiversity and ecological resilience.

The 2018 review concluded that the site was fulfilling its Green Belt purpose under paragraph 134 of the NPPF (now paragraph 145).

---

## **2. Procedural Deficiencies**

The proposed policy change was not disclosed to the public until the Council's agenda papers were published on 26 June 2025. This constitutes a substantial policy shift that:

- Was not included in prior Regulation 18 consultations.
- Undermines the requirements for transparency, democratic process, and meaningful public engagement set out in the NPPF and the Localism Act 2011.

Medway Council has advanced this policy before Gravesham Borough Council has finalised its own Local Plan and Green Belt review, resulting in premature, uncoordinated, and inconsistent spatial planning.

---

## **3. Policy Conflict – “Grey Belt” Classification**

The introduction of the “Grey Belt” category, referenced in the 2024 King's Speech and Labour Party statements, is intended for previously developed land within the Green Belt that is of low environmental or visual value (e.g., wastelands, derelict sites, or old car parks).

The site in question does not meet this definition. It is:

- Open, undeveloped, and visually integral to the Green Belt.
- Actively used for agriculture and classified as Grade 1 land.

- Rich in biodiversity and local heritage value.

Reclassifying it as “Grey Belt” would be contrary to the spirit and intent of the policy as described by both the Government and the NPPF.

---

## **4. NPPF Compliance**

Paragraph 153 of the NPPF states:

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

Further, paragraph 148 requires that:

“...substantial weight is given to any harm to the Green Belt... Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

No such very special circumstances have been demonstrated in this case. On the contrary:

- The harm to the Green Belt is significant and permanent.
  - The site’s environmental and agricultural value is high.
  - The reclassification would set a dangerous precedent for unjustified Green Belt loss.
- 

## **5. Conclusion**

This proposal is procedurally flawed, contrary to national policy, and unsupported by evidence that would meet the threshold of “very special circumstances.”

I therefore respectfully request that the proposal be withdrawn or refused in its entirety.

---

Yours faithfully,

Kevin Price



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** New plan  
**Date:** 13 August 2025 14:13:32

---

Good Afternoon  
I believe this is for you.  
Kind regards  
Joanne

-----Original Message-----

From: [REDACTED]  
Sent: 11 August 2025 11:41  
To: representations, planning <[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)>  
Subject: Objection

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Kevin Price

[REDACTED]  
Me2 [REDACTED]  
[REDACTED]

9/8/2025  
Planning Department  
Medway Council

Subject: Formal Objection – Proposed Reclassification and Jurisdiction Transfer of Land North of Beaufort Road and West of Rede Court Road, Strood

Dear Sir/Madam,

I am writing to register a formal objection to the proposed reclassification and transfer of the land north of Beaufort Road and west of Rede Court Road, Strood, into Gravesham's jurisdiction and its potential downgrading from Green Belt to "Grey Belt."

This objection is submitted in accordance with the Town and Country Planning Act 1990 and the National Planning Policy Framework (NPPF).

1. Designation and Importance of the Site According to the Medway and Gravesham Green Belt Review (2018), this land:

Forms a critical strategic gap between Gravesham and Strood, preventing urban sprawl.

Is classified as Grade 1 agricultural land, denoting the highest quality farmland in England.

Provides essential habitats for multiple wildlife species, supporting biodiversity and ecological resilience.

The 2018 review concluded that the site was fulfilling its Green Belt purpose under paragraph 134 of the NPPF (now paragraph 145).

2. Procedural Deficiencies

The proposed policy change was not disclosed to the public until the Council's agenda papers were published on 26 June 2025. This constitutes a substantial policy shift that:

Was not included in prior Regulation 18 consultations.

Undermines the requirements for transparency, democratic process, and meaningful public engagement set out

in the NPPF and the Localism Act 2011.

Medway Council has advanced this policy before Gravesham Borough Council has finalised its own Local Plan and Green Belt review, resulting in premature, uncoordinated, and inconsistent spatial planning.

3. Policy Conflict – “Grey Belt” Classification The introduction of the “Grey Belt” category, referenced in the 2024 King’s Speech and Labour Party statements, is intended for previously developed land within the Green Belt that is of low environmental or visual value (e.g., wastelands, derelict sites, or old car parks).

The site in question does not meet this definition. It is:

Open, undeveloped, and visually integral to the Green Belt.

Actively used for agriculture and classified as Grade 1 land.

Rich in biodiversity and local heritage value.

Reclassifying it as “Grey Belt” would be contrary to the spirit and intent of the policy as described by both the Government and the NPPF.

#### 4. NPPF Compliance

Paragraph 153 of the NPPF states:

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”

Further, paragraph 148 requires that:

“...substantial weight is given to any harm to the Green Belt... Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

No such very special circumstances have been demonstrated in this case. On the contrary:

The harm to the Green Belt is significant and permanent.

The site’s environmental and agricultural value is high.

The reclassification would set a dangerous precedent for unjustified Green Belt loss.

#### 5. Conclusion

This proposal is procedurally flawed, contrary to national policy, and unsupported by evidence that would meet the threshold of “very special circumstances.”

I therefore respectfully request that the proposal be withdrawn or refused in its entirety.

Yours faithfully,

Kevin Price

Sent from my iPhone

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection  
**Date:** 10 August 2025 21:27:19

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You don't often get email from [REDACTED] [Learn why this is important](#)

Kevin Price

[REDACTED]

Me2 [REDACTED]

[REDACTED]

9/8/2025

Planning Department

Medway Council

Subject: Formal Objection – Proposed Reclassification and Jurisdiction Transfer of Land North of Beaufort Road and West of Rede Court Road, Strood

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- Was not included in prior Regulation 18 consultations.
- Undermines the requirements for transparency, democratic process, and meaningful public engagement set out in the NPPF and the Localism Act 2011.

Medway Council has advanced this policy before Gravesham Borough Council has finalised its own Local Plan and Green Belt review, resulting in premature, uncoordinated, and inconsistent spatial planning.

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The site in question does not meet this definition. It is:

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- Rich in biodiversity and local heritage value.

Reclassifying it as “Grey Belt” would be contrary to the spirit and intent of the policy as described by both the Government and the NPPF.

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- The harm to the Green Belt is significant and permanent.

- The site's environmental and agricultural value is high.
- The reclassification would set a dangerous precedent for unjustified Green Belt loss.

## **5. Conclusion**

This proposal is procedurally flawed, contrary to national policy, and unsupported by evidence that would meet the threshold of "very special circumstances."

I therefore respectfully request that the proposal be withdrawn or refused in its entirety.

Yours faithfully,

Kevin Price

Sent from my iPhone

**From:** [representations, planning](#)  
**To:** [policy, planning](#)  
**Subject:** FW: Regulation 19 local plan 2041 - objection  
**Date:** 04 August 2025 06:21:28

---

Hi  
Local plan representation from Cllr Sands  
Many Thanks

**[REDACTED] /Medway Council**  
**Gun Wharf Dock Road Chatham Kent ME4 4TR 01634 333333**



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**From:** Councillor Ron Sands [REDACTED]  
**Sent:** 03 August 2025 09:28  
**To:** representations, planning <[planning.representations@medway.gov.uk](mailto:planning.representations@medway.gov.uk)>  
**Subject:** Regulation 19 local plan 2041 - objection

Objection to Medway Council Local Plan 2041

we object to the Medway Local Plan 2041 on the grounds that it promotes unsustainable development—particularly in Hoo St Werburgh and the Hoo Peninsula—that threatens both the environment and the integrity of local communities.

The plan fails to:

- Respect environmental constraints, proposing housing in or near protected habitats (SSSIs, SPAs, Ramsar sites), which risks irreversible ecological damage.
- Ensure infrastructure is in place first, with housing outpacing the delivery of roads, schools, healthcare, and sustainable transport.
- Prevent car-dependent sprawl, increasing emissions, congestion, and pollution while undermining national and local climate targets.
- Safeguard community identity, allowing piecemeal growth that fragments settlements and weakens social cohesion.

The plan is inconsistent with the principles of sustainable development outlined in the National Planning Policy Framework (NPPF), and should be revised to prioritize brownfield regeneration, robust environmental protection, and truly sustainable infrastructure-led growth.

Regards

Ron Sands and Dawn Waller

[REDACTED]

[REDACTED]

ME3 [REDACTED]

Sent from [Outlook for iOS](#)



**From:** [Helen Hammond](#)  
**To:** [policy, planning](#)  
**Subject:** Planning in Medway  
**Date:** 10 August 2025 21:38:14

---

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

You had asked for feed back on planning. I feel there has been too much house building in this area. The pressure for more development seems never ending. We need to look after our green spaces.

H Hammond

Sent from my iPhone

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway local plan  
**Date:** 11 August 2025 09:33:02

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Dear Team

I consider the Medway Local Plan is an ill thought out waste of time , considering the enormous amounts of brownfield sites that will go unused destroying high productive agriculture land destroying Chatham Docks which you said you would not do you can not be trusted far too many broken promises and lies . I have no confidence in anything you say Jarretts lot were abysmal but you even surpass them .

Yours

D Bennett

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection to the Medway Local Plan  
**Date:** 11 August 2025 12:38:47

---

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Dear Sir or Madam

Please accept this is my personal representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation to the Independent Planning Inspector when the plan is submitted for examination.

The Local Plan is not legally compliant for the following reasons:

- The Local Plan fails the Duty to Cooperate (section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to National Planning Policy Framework (NPPF) paragraphs 24-28.
- In their consultation, Medway Council has failed to comply with Regulation 18 and 19 requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at the Regulation 18 consultation stages and insufficient regard has been paid to community representations in the Regulation 19 draft Plan.
- Medway Council is actively preparing and revising evidence and planning documents which support the Regulation 19 version of the draft plan but have refused to extend the consultation period. Residents and other interested parties are therefore unable to comments on this evidence and these documents. This is procedurally defective.
- If the plan is considered to be non-legally compliant, the plan therefore fails and/or the Council may be asked to withdraw it from examination by the Inspector. No amount of further work at this late stage can rectify it's non-compliance. However, should that not be the case, I have written my objections to the plan below as it is not sound.

The Local Plan is not sound

Should the draft Plan be considered to have conformed to all of the legal requirements, the Plan is unsound for the following reasons:-

- The Local Plan does not conform with the NPPF (December 2024). Numerous policies do not align with legal obligations of the NPPF including sustainable development (paragraph 11), plan-making (paragraphs 15-36), and the treatment of Neighbourhood Plans (paragraphs 30-31). The draft Plan ignores many brownfield sites and favours greenfield development – this is against Government policy on sustainability. The number of homes proposed in the Plan for the Hoo Peninsula is unsustainable. The impacts of these homes on transport, education, health, drainage, water and infrastructure are all unmitigated and therefore the plan fails to adhere to national policy.

- There is insufficient integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle. The number of homes proposed in the Plan for the Hoo Peninsula is unsustainable. The impacts of these homes on the environment will be devastating and contrary to Government policy. There is no evidence in the Plan of the 400 metre buffer zones being applied to development in areas that border protected sites such as Special Protection Areas, SSSIs and the RAMSAR site.
- There is lack of evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF paragraph 35.
- The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and environmentally sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife – following the avoid, mitigate and compensate hierarchy.

Regards

Lousie Putnam (Mrs)

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Re: Objection to building  
**Date:** 11 August 2025 13:55:42  
**Attachments:** [image001.png](#)

---

Hi.

Please find our comments as follows:

“Objection to proposed building on fields behind Brompton Farm Road

We understand this site has now been designated ‘grey belt’ which marks a change in Medway’s Green Belt policy. We do not understand how or why this is justified as in the 10 years we have lived here the fields have been farmed every year.

We understand there are plans to build 850 houses including a school which will impact greatly on the already increasing traffic, noise and pollution. Linda is awaiting results for cardiorespiratory ailments following a heart attack and feels these symptoms will only be exacerbated with more dust and pollution from building works, let alone disturbance from extra traffic and noise.

We would like to know if there are plans for increased infrastructure to support these homes, seeing as every GP surgery in the area is already over prescribed, you can’t get a doctor’s appointment for three weeks and there are plans to close the GP practice in Higham, which would probably be the nearest to this area. This is just ridiculous.

There are fuel pipes running under the fields and residents living nearby receive annual letters reminding them not to erect sheds or fences etc, and yet it suddenly seems viable to build 850 houses - this makes no sense whatsoever.

Finally, we have seen birds of prey such as buzzards, red kite, bats and other wildlife in the fields which will all lose their natural habitat. It’s a lovely area to walk, with or without a dog. Losing these fields would have a negative on everyone who lives near them and who purchased properties in order not to be overlooked by housing.

We hope you will take these points into consideration.

Yours faithfully

Linda & Antonio Riordan

[REDACTED] ME2 [REDACTED]

Sent from Linda Riordan's mobile

On Mon, 11 Aug 2025 at 13:52, policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)> wrote:

|

Hi Linda,

Yes, please do so.

Kind regards

**Planning.Policy** | Planning Service | Medway Council

**1629** | Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

You can [register to receive updates](#) about our work on the Medway Local Plan.



---

**From:** Linda Riordan [REDACTED]  
**Sent:** 11 August 2025 13:12  
**To:** policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)>  
**Subject:** Re: Objection to building

 You don't often get email from [REDACTED] [Learn why this is important](#)  
Good afternoon

Would it be easier for me to cut and paste please?

Kind regards.

Linda Riordan

Sent from Linda Riordan's mobile

On Mon, 11 Aug 2025 at 12:09, policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)> wrote:

Dear Linda,

Your attachments are not viewable. Please can you resend.

Kind regards

**Planning.Policy** | Planning Service | Medway Council

**1629** | Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

You can [register to receive updates](#) about our work on the Medway Local Plan.



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**From:** Linda Riordan [REDACTED]

**Sent:** 10 August 2025 16:13

**To:** policy, planning <[planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)>

**Subject:** Objection to building

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Please see the attached.

The content Objection to building.pages of type application/x-iwork-pages-sffpages has been blocked.

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**From:** mark batchelor

**Sent:** 29 August 2025 08:05

**To:** policy, planning

**Subject:** Re: Medway Local Plan 2041 consultation Regulation 19 June 2025

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Dear Medway Council.

I have not received a confirmation of acceptance email for my submission on 10th August 2025 concerning Medway Local Plan reg 19 consultation.

Please can you confirm it has been received and logged.

Yours faithfully

Mark Batchelor

On 10 Aug 2025, at 22:54, mark batchelor [REDACTED] wrote:

Dear Planning Services at Medway Council.

Please find below my comments on  
Medway Local Plan 2041, Proposed submission draft,  
Regulation 19. June  
2025

**Object** to the plan

It is not legally compliant

It is not sound

It does not comply with the duty to cooperate

Policy 4.12 Green Belt.

Policy 4.12.1 and 4.12.2 clearly states the importance of the Metropolitan Green Belt and especially the strategic gap between Strood and Gravesham.

Policy 4.12.3 and 4.12.4 states that the release of sites SNF1, SNF3 and SR5 can be justified when coupled with the adjoining sites within Gravesham Borough Council (Policy SA6 and Spatial development policy at 2.3)

Fact.

1. In the NPPF paragraph 134 it states greenbelt should 1. Check Urban Sprawl. 2. prevent neighbouring towns from merging. 3. To assist in safeguarding the countryside from encroachment.
2. In the NPPF paragraph 110, there should be a sustainable choice of transport modes.
3. In the NPPF paragraph 155, development should not be inappropriate and should be in a sustainable location.

The above policies are not being followed.

In the Greenbelt review Medway Council has classed SNF1, SNF3 and SR5 as 'Moderate' with some classifications as 'Weak'.

This is clearly not the case given the Greenbelt in Medway consists of only 4.98% of the borough.

There has also been no release of information about the meeting between Medway and Gravesham. Has there really been cooperation?

Nor has Gravesham release their Regulation 19 consultation. Without which there is no evidence to justify the realise of the Greenbelt.

In the Sustainability Appraisal of the Medway Local Plan (2025-2041) regulation 18 June 2024

SNF1, SNF3 and SR5 were REJECTED for - Loss of BNV agricultural land. Greenbelt. Development coalescence between settlements and being beyond walking distance from local public transport. Nothing has changed since this statement so NPPF paragraph 110 and 155 have not been satisfied.

At no time have the public been consulted on the release of Greenbelt until the publication of the Regulation 19 consultation. This shows an attempt to lever its release by unlawful.

The Greenbelt reviews by Medway should have taken the land supposedly allocation by Gravesham into its review. Should this have happened it shows a clear unrestricted urban sprawl, a clear merging with the periphery of Higham village and clear encroachment into the countryside. Therefore breaking NPPF paragraph 134.

Conclusion.

The Greenbelt review is flawed, unsound, illegal and presents no evidence of the supposed cooperation.

Sites SNF1, SNF3 and SR5 should therefore be rejected from adoption and alternatives found.

Policy 9 Transport.

There is acknowledgement that the dependency on car will be hard to reduce. However the increase housing numbers on the Hoo Peninsula without the improved infrastructure that was once promised in the Housing Infrastructure Fund will now not happen.

Why Policy DM17 has been included for the Grain Branch is questionable. Perhaps this is a 'smokescreen' to try and pass the local plan when there is no real chance of this ever becoming a reality.

Please pass these comments onto the planning inspector.

Yours faithfully

Mark Batchelor MRICS FAAV

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ME3 [REDACTED]

ME2

Dear Sirs

**Medway Local Plan 2041**

I have read what I consider to be all relevant parts of the above document together with the Green Belt Review document, attended the exhibition at St. Nicholas church (wrong address and post code given on your web site) and had a brief discussion with Dave Harris about the "Land west of Strood" development in particular, and attended the recent public meeting at St. Francis church.

I have also consulted the NPPF with regard to the designation of Green Belt land and in particular 13 "Protecting Green Belt Land".

In these documents reference is made to grey belt land, but the definition of which is somewhat vague, referring to "Previously developed land" and giving various "Golden rules" before development is permitted on what is designated Green Belt.

With regard to the "Land west of Strood", parcels 1 to 6 in the Green Belt Review, parcel 1 is an existing sports field with the usual amenities associated with same. Parcels 2 to 6 are all Grade 1 agricultural land and cannot therefore be described as "Previously developed land".

Much play is made of defining "Boundaries" as being a significant physical feature: in these modern times of GPS, Digital Mapping and other technological wizardry this seems to be slightly *Déjà vu*.

It would appear that much consideration is being given to the Gravesham Local Plan which has yet to be made public. The developments proposed along the current boundary would be more associated with Medway regarding the provision of roads, schools, medical facilities etc. These existing facilities in the Medway area are currently overloaded.

These proposals regarding "Land west of Strood" will result in closing the, already small, gap along the Strood-Higham-Chalk-Gravesend axis, removing much needed agricultural land permanently, increased air pollution from vehicles, additional demands for water services/waste removal etc.

Perhaps I can also mention the current planning application MC/25/0006 for 800 houses north of the A289/B2000 junction as being another example of the expansion of Strood devouring farmland and its "Open aspect".

The whole of the above document appears to have been constructed in haste, with arbitrary classification given to parcels of land to fit in with preconceived notion that "These houses have got to be put somewhere so let's take this approach and co-ordinate with the next door Authority".

Not good. If there is so much pressure for additional housing in this area, why have various, cleared, brownfield sites remained vacant for so long: the ex Civic Centre in Strood springs to mind.

In conclusion, please be reminded that once development has occurred on this land it is irreversible. GONE FOREVER.

Yours faithfully,

James O'Brien

Planning Service  
Medway Council  
Gun Wharf  
Chatham  
ME4 4TR.

Planning Service  
Medway Council  
Gun Wharf  
Chatham  
ME4 4TR.

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Regulation 19 consultation  
**Date:** 11 August 2025 15:14:16  
**Attachments:** [image797071.png](#)  
[image859509.png](#)

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I don't believe the plan is legally compliant and sound.

Specifically, building on what remains of the green space between Hempstead, and Maidstone Borough Council's boundary seems crazy. There is insufficient evidence to say that it's the proper place to build, and given the pollution from the M2 and Hoath Way, a green lung is surely what is needed for the health of our residents given Maidstone's already considerable plans to build over Lidsing? There appears to be a failure to consider the environmental (and as a result, health) impacts of those local to this proposed element.

Given the development already in the offing from the neighbouring council, and the fact that this location is nowhere near the rail network if we are looking to encourage the use of public transport, it's not the right place to build (and I would question if it's even needed for the residents of Medway itself). If it's to accommodate London's population, why not build on some of the vast green spaces in London itself, or at least ensure that there are proper (and fully thought out) public spaces within the scheme designs here... Dare I say that a minor injuries facility should also be part of any plans on the outskirts of Hempstead if you insist on building here? Potentially avoiding people having to travel through town to what is already an overstretched Medway hospital!

Robin Watkins

**\*\*Please do not publish my address \*\***

[REDACTED], ME7 [REDACTED]

**Robin Watkins**  
Principal Consultant



W: [www.broadstone.co.uk](http://www.broadstone.co.uk)

Broadstone Financial Solutions Limited  
100 Wood Street, London, EC2V 7AN, United Kingdom





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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] ME2 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

11<sup>th</sup> August 2025

Dear Sirs,

**Medway Local Plan 2**

Re the above, we wish to register our objections to the proposal plan on the following grounds:-

1. The proposed development of parcels of land namely 2-6 will encroach on Protected Green Belt land and the Green Belt land in this location still performs the functions for which it was originally designated in order to prevent Urban Sprawl. The proposal to build houses on these parcels of land (if granted) would result in losing valuable and prime agricultural land which is currently farmed and cannot be identified as "previously developed land". Loss of this land would be an impact on our food supply and inevitably increase in food imports to this country, especially when we are encouraged to "buy British". Removal of this agricultural land when dug over will be lost forever and not recoverable.
2. Any development of this land will bring about an increase in road traffic (more homes means more cars), which is crowded at peak times of the day i.e. School runs, commuter traffic etc. The roads that are proposed to be opened up to allow access, Clinton Avenue, Carrisbroke Road and Beaufort Road are far too narrow to accommodate extra vehicles and were never designed for any increase in traffic and this will have a detrimental effect on noise and air pollution, not forgetting access for emergency vehicles if needed. Some years ago it was recognised that heavy traffic around Rede Court Road was identified as being undesirable and significant funds were made available to create bypasses.
3. Development on this land for housing will inevitably place an increase in burden for already stretched resources resulting in extra demands for utility services gas, electricity, water and waste services, an increase in demand for schools, hospitals, doctors and dentist surgeries all of which are woefully inadequate for existing local residents and would be even more stretched with an influx of new residents. This would overwhelm residents especially with an aging population but also with the advent of new residents. With this in mind, newer residents would eventually have an increase in child population and would cause pressure on local schools, colleges etc resulting in overcrowding or widespread bussing to schools further afield with current bus services not able to cope.

4. In the "Strategic Land Available Assessment 2018" it identifies this land as not suitable for housing. What has changed? The proposal for development of this land does not seem to have been thought out with the local population in mind. To develop Green Belt land and in particular "Protected Green Belt Land" seems to forget that a local plan should examine Brown Field sites before any attempt to develop Green Belt land. Some such sites immediately come to mind with underdeveloped land on the old Civic Centre site which has laid dormant since 1998. Why has this not been considered? Also, the land near Rochester train station at junction of Corporation Street and Rochester High Street which was formerly a car showroom which has laid to waste for some 8-10 years! The land proposed for development in parcels 2-6 is part of the London Green Belt Land which has Natural protection for its importance and anything that impacts on the openness of the Green Belt is inappropriate and must be considered inappropriate. Any change of use of the proposed development would therefore be contradictory to the principles behind these plans. The N.P.P.F. argue that any changes to Green Belt boundaries only happen in "exceptional circumstances" so what are these as it has not been made clear and therefore this proposal for development must be objected on the grounds stated above.

Yours Faithfully

Bruce Arthur Cagneux

**From:** [REDACTED]  
**To:** [futuremedway](#)  
**Subject:** Draft Local Plan  
**Date:** 02 August 2025 14:10:18

---

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I appreciate the opportunity to comment on the proposed local plan. While I understand the need for strategic planning to support Medways growth, I have serious concerns about several aspects of the draft.

#### Chatham Docks Redevelopment

The proposal to repurpose this vital industrial site for housing risks significant job losses and erodes Medways maritime and industrial identity. Also most of the tenants of the new housing will be from outside Medway so the job requirements will be even more of a problem.

I urge the Council to reconsider this and explore alternatives that preserve employment and heritage.

#### Green Belt Encroachment

The suggested changes to the green belt to the green belt north of Strood are deeply troubling as it seems Kents green belt is being slowly eroded at the cost of reducing essential environment and agriculture land apart from impacting community wellbeing and biodiversity.

#### Infrastructure Readiness

The scale of housing development is out of control as the roads, schools and healthcare can not keep up with the existing population let the expansion that is required for the Plan.

Sincerely

Richard Gransden

**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Objection to houses Chapter Farm plan 2041  
**Date:** 11 August 2025 15:37:55

---

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I Object the Local Planning on chapter farm as I believe green belt was ment to be Kept for farming not housing plus the pipeline (Oxolum), traffic pollution,wild life being non existent if there habitat I'd destroyed. Photo below should also be taken in account as well,SO PLEASE REFUSE PERMISSION TO BUILD ANYTHING ON THIS LAND.  
YOURS sincerely E Butcher [REDACTED] ME2 [REDACTED]

#### Medway Local Plan 2041

I have read what I consider to be all relevant parts of the above document together with the Green Belt Review document, attended the exhibition at St. Nicholas church (wrong address and post code given on your web site) and had a brief discussion with Dave Harris about the "Land west of Strood" development in particular, and attended the recent public meeting at St. Francis church.

I have also consulted the NPPF with regard to the designation of Green Belt land and in particular 13 "Protecting Green Belt Land".

In these documents reference is made to grey belt land, but the definition of which is somewhat vague, referring to "Previously developed land" and giving various "Golden rules" before development is permitted on what is designated Green Belt.

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It would appear that much consideration is being given to the Gravesham Local Plan which has yet to be made public. The developments proposed along the current boundary would be more associated with Medway regarding the provision of roads, schools, medical facilities etc. These existing facilities in the Medway area are currently overloaded.

These proposals regarding "Land west of Strood" will result in closing the, already small, gap along the Strood-Higham-Chalk-Gravesend axis, removing much needed agricultural land permanently, increased air pollution from vehicles, additional demands for water services/waste removal etc.

Perhaps I can also mention the current planning application MC/25/0006 for 800 houses north of the A289/B2000 junction as being another example of the expansion of Strood devouring farmland and its "Open aspect".

The whole of the above document appears to have been constructed in haste, with arbitrary classification given to parcels of land to fit in with preconceived notion that "These houses have got to be put somewhere so let's take this approach and co-ordinate with the next door Authority".

Not good. If there is so much pressure for additional housing in this area, why have various, cleared, brownfield sites remained vacant for so long: the ex Civic Centre in Strood springs to mind.

In conclusion, please be reminded that once development has occurred on this land it is irreversible.

## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this  
representation relates:

Medway Local Plan

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)  
boxes below but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Alex"/>	<input type="text"/>
Last Name	<input type="text" value="Cameron"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="ME1 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

---

## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

NA

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NA

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>



# Consultation Response to the Medway Draft Local Plan (Regulation 19)

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*Submitted by: Alex Cameron Date: 11 August 2025*

## Introduction

I am a resident of Medway, and am interested in ensuring the Medway Draft Local Plan is a sound and legally compliant framework that truly meets the needs of Medway for at least the next 20 years. A truly sound plan must balance the need for sustainable economic and population growth alongside the new housing needed to fuel that growth with the long-term protection of our social, economic, and natural environment. I feel the plan does strive to achieve that and the council team are to be complimented in the quality of the work done in compiling the plan.

However, flowing out of my review of the plan I have a number of observations and comments on the detailed content of the plan which are summarised below. The plan includes a very large volume of data so it has not been possible to read every page of every document and it may be that some of my comments are addressed within the detailed reports and other evidence.

I have found this consultation process valuable and applaud the council in its commitment to seeking the views of the people of Medway. As part of the ongoing consultation and community engagement process I urge the council to permit residents to attend the 'Examination in Public' to ensure community voices are fully considered at all stages in this process.

## Part 1: Key Observations and Recommendations

This section outlines specific recommendations to improve the plan's legal compliance and soundness.

### Meeting National Planning and Sustainability Goals

Medway's unique topography, history, and resources require a dedicated planning approach. To improve the **legal compliance and soundness** of the Draft Local Plan, I recommend a more thorough consideration of the following points, which are grounded in the principles of the National Planning Policy Framework (NPPF) and the United Nations Sustainable Development Goals.

The NPPF and the UN Goals for Sustainable Development emphasize creating strong, vibrant, and healthy communities while protecting the environment and fostering a competitive economy. The Draft Local Plan's vision and strategic objectives align with these goals, but the policies need to be strengthened to ensure they are fully met.

- **Social Objective:** The plan should ensure a sufficient number and range of homes for present and future generations, including a dedicated strategy to address homelessness and affordable housing.
- **Economic Objective:** The plan needs to guarantee that the right land is available in the right places and at the right time to support growth and infrastructure.
- **Environmental Objective:** Policies must be in place to protect and enhance our natural, built, and historic environment, improve biodiversity, use resources prudently, and adapt to climate change.

## Improving Social and Economic Outcomes

The Draft Local Plan should be strengthened in the following areas to better serve Medway's residents and economy.

- **Homelessness and Affordable Housing:** The Local Plan must explicitly address homelessness. I urge Medway Council to include the strategies currently being pursued to alleviate and eliminate homelessness within the plan period, as this is a core requirement of national policy.
- **Community Allotments and Gardens:** The plan should ensure adequate provision of allotments and community gardens to meet the evident community need, given the long waiting lists.
- **Local Economy and Small-Scale Development:** The plan's objectives to provide for custom and self-build housing are commendable. To further support the local economy, the plan should include policies that encourage small-scale, community-led developments, which can be achieved through conditions written into agreements and design codes.
- **Neighbourhood Plans:** I support the plan's acknowledgment that it will be used alongside any relevant neighbourhood plans. The council should actively encourage and support communities in creating their own Neighbourhood Plans to achieve a more finely tuned local plan at the ward level.
- **Infrastructure Provision:** The plan correctly emphasizes that "Infrastructure provision will require collaborative working" with stakeholders. To ensure timely delivery of essential infrastructure, the plan should formalize this with a specific policy that uses pre-commencement conditions (such as 'Grampian Conditions') to ensure infrastructure is in place before development proceeds. This would guarantee infrastructure is provided concurrently with development.

## Protecting and Enhancing Medway's Environment

Medway has globally significant environmental assets that must be protected, especially in the face of climate change.

- **Sea Level Rise:** The plan correctly identifies that Medway is "particularly vulnerable to rising sea levels". The plan should include a detailed study and a map of areas at risk from the projected 300mm rise by 2100. This proactive approach, learning from countries like the Netherlands, is essential to protect marshlands, farmland, and built-up areas.
- **Internationally Important Environmental Assets:** The plan rightly recognizes the "international importance" of Medway's environmental assets, including Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSI). I urge the council to explicitly include policies that support the proposed UNESCO World Heritage Site's adoption, which would provide enhanced protection for these assets.
- **Agricultural Land:** While the plan considers "large and strategic scale development allocations" in rural areas, I believe a stronger policy is needed. The plan should implement a clear policy that strictly prohibits development on the best and most versatile agricultural land. With extreme weather conditions from global warming, such land will become even more precious and vital for food security.
- **Brownfield Sites:** I support the council's 'brownfield first' approach and the target to deliver 40% of housing needs on these sites. However, I believe the plan should be more ambitious, targeting at least 85% of development on previously developed land to protect Medway's rural areas and support the construction of carbon-neutral buildings in existing urban areas. The council should also ensure its Brownfield Site Register is kept up to date.

- **Sustainable Transport:** The plan's objective to reduce reliance on cars is a positive step. However, a holistic approach is needed, with the primary objective being to reduce the need to travel altogether, rather than simply relying on increased public transport, which may worsen road congestion.
- **Rural Development:** The plan acknowledges the need to direct development to "less sensitive greenfield areas on the edges of towns and villages". I disagree with this approach and urge the council to follow the NPPF's policy of not permitting development on undeveloped rural land, except in exceptional circumstances.
- **Future Homes Standard:** The plan's commitment to "high sustainable buildings standards" is a good foundation. The plan should explicitly state its intention to adhere to the upcoming Future Homes Standard to ensure all new housing developments are designed to be low-carbon and environmentally friendly.
- **Innovative Housing:** I support the plan's inclusion of houseboats as a potential housing solution. The plan should continue to review many and varied ways to provide sustainable accommodation for its residents, such as residential marinas in non-sensitive areas, without jeopardizing the environment.

## Financial Viability

The plan does not explicitly demonstrate its financial viability in a dedicated section which I feel is an omission. However, it does address the topic in the separate Viability Assessment Document and indirectly by referencing the funding of infrastructure and development.

- **Infrastructure Delivery Plan (IDP):** The document mentions that the plan's policies and strategic allocations are supported by an **Infrastructure Delivery Plan (IDP)**. The IDP outlines the infrastructure required to support the plan's growth and, crucially, identifies how this infrastructure will be funded. This is the primary mechanism for demonstrating viability.
- **Funding Mechanisms:** The plan refers to a number of funding sources for infrastructure, including:
  - Community Infrastructure Levy (CIL): A charge on new developments used to fund infrastructure projects.
  - Section 106 Agreements: Legal agreements between developers and the council to mitigate the impact of development.
  - Third-party funding: This includes grants, private investment, and contributions from other organizations.
- **Viability Assessments:** The plan states that the "Council will carry out viability assessments" for new developments to ensure they are deliverable. These assessments consider land values, construction costs, and policy requirements to determine if a development is financially viable.

I suggest a section entitled "Financial Viability," be added to pull together the strategy outlined in the associated Infrastructure Delivery Plan (IDP) and the commitment to conducting viability assessments on new developments to ensure its policies are financially sound and deliverable.

## Part 2: Strengths of the Plan

### Key Provisions for Energy Infrastructure

I am pleased that the plan provisions for future energy infrastructure, with a clear focus on transitioning to a net-zero carbon economy. The document includes a dedicated chapter on Energy (Chapter 13) that outlines the council's approach which provides an excellent foundation to build this strategy on.

- **Net-Zero Transition:** The plan's vision is to achieve a "significant reduction in carbon emissions" by 2041 and be "well on its pathway to net zero by 2050". This is a "fundamental principle" of the plan and is reflected in its policies and spatial strategy.
- **Strategic Energy Locations:** The document identifies **Kingsnorth** and the **Isle of Grain** as "suitable locations for renewable and low carbon energy development". These sites have historical significance for energy infrastructure and are being transitioned away from fossil fuels. The plan supports proposals for such developments in these areas, provided that any negative impacts are acceptable.
- **Local and Community Energy:** The plan encourages community-led initiatives for renewable and low-carbon energy. It states that "communities are harnessing the results of their direct involvement in decision making on community owned, local energy infrastructure". The document also notes that neighbourhood plans can be used to plan for community energy developments.
- **Heat Networks:** The plan explicitly mentions **heat networks** as a potential opportunity to transition away from carbon-rich gas heat sources. The use of surplus heat from energy-from-waste (EfW) plants is highlighted as a way to support this shift.
- **Carbon Capture:** The plan acknowledges the need for associated carbon capture and storage technology at the Kingsnorth and Isle of Grain sites. The document notes the "long-term research and development opportunities associated with carbon capture technology".
- **Wider Infrastructure:** The plan supports large-scale Net Zero Carbon Energy generating uses and port-related facilities, directing them towards the Hoo Peninsula. This is part of the strategy to capitalize on the area's unique opportunities to support new and developing economic sectors.

### Sustainable Reuse of Heritage

The plan also does well to cover the sustainable reuse of heritage sites and buildings, making it a core component of its strategy for the built environment.

- **Dedicated Chapter:** The plan includes a dedicated chapter, "Built Environment" (Chapter 5), with specific sections on "Historic environment" and "Heritage assets".
- **Vision and Strategic Objectives:** The plan's vision explicitly aims to strengthen the area by "displaying its rich heritage" and shaping growth by "understanding the area's important historic environment, respecting identity and strengthening distinctiveness". It also includes an objective to "conserve and enhance the natural, built and historic environment".
- **Encouraging Reuse:** The plan is committed to the "conservation, enhancement and enjoyment of the historic environment". A key policy, Policy S8, specifically encourages development that "makes sensitive reuse of heritage assets consistent with their conservation, particularly where they are vacant or redundant, and especially if they are considered to be 'at risk' on national and local registers".

- **Embodied Carbon:** The plan highlights the environmental benefits of reusing existing buildings. It states that "Maintaining, repairing, reusing and adapting existing buildings to enable their continued use is one of the most effective ways to reduce carbon emissions and unnecessary waste". This is supported by specific guidance for developers to "explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions".
- **Site-Specific Policies:** The document includes specific site allocations that are "Heritage-led". For example, Site SM16 is identified as an "opportunity for heritage led regeneration that draws on the sites history" and where a thorough understanding of the site's heritage would "de-risk future development". It also notes that sites within the Chatham Rail Station area have an "opportunity to reveal much about the history of Chatham through sensitive design". \*
- **Supporting Guidance:** The plan also references and is supported by a number of additional documents, including the **Medway Heritage Strategy** and the **Star Hill to Sun Pier Development Framework**, a Heritage Action Zone (HAZ) designation. The plan requires development to adhere to advice from **Historic England** on adapting historic buildings for climate change.
- **Demolition and Loss:** To protect heritage assets, the plan states that the "demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons" and that all possible methods of preserving the asset have been exhausted.

## A Thriving Creative Sector

The plan does well to address the growth of a sustainable creative sector, viewing it as a key economic driver and a central component of its strategy for regeneration and community well-being.

### Key Provisions and Policies

- **Strategic Vision:** The plan's overall vision is to "strengthen Medway's position in the economy and culture of the region". It states that Medway is a place "known for its innovation and creativity" and that "culture and creativity" are a key part of its strategy for regeneration and economic development.
- **Dedicated Policies:** The plan includes a specific section on "Culture and creative uses" within the "Economic Development" chapter. This section outlines the vision for Medway to be "internationally recognised for its creativity and culture".
- **Creative Clusters:** The plan supports the growth of "strategic clusters of cultural attractions" and identifies several key locations for this, including **Rochester District Centre, Chatham Town Centre, Gillingham District Centre, Chatham Dockyard**, and the **Star Hill to Sun Pier** area.
- **Star Hill to Sun Pier Heritage Action Zone (HAZ):** The document specifically highlights the Star Hill to Sun Pier area as a "unique offer to Medway" and an "ideal location for embracing the creative sector". It notes that this area has a Heritage Action Zone (HAZ) designation and that the council has adopted a Supplementary Planning Document (SPD) to guide its development as a "social, cultural and retail destination".
- **Supporting Infrastructure:** The plan recognizes that creative and cultural industries can emerge in a "spontaneous manner" and that they can be supported by "flexible and cheap accommodation" and "studio workspaces". It aims to meet the cultural needs of both existing and new communities by developing "cultural venues, facilities, uses and creative workspaces" and by retaining and enhancing existing ones.

- **Economic Strategy Integration:** The plan's economic strategy acknowledges the need to support cultural and creative industries, and it explicitly directs new office and related activities towards town centers and regeneration areas where they can foster a "critical clustering of economic activity". This aligns with the wider strategic priorities of the council, including the Creative **Medway Cultural Strategy (2020 – 2030)** and the **Creative Estuary Initiative**.
- **Sustainability:** The plan's vision includes the idea of achieving sustainable growth that is supported by a strong cultural economy. The document links a vibrant cultural offer to the viability of town centers and the well-being of communities. It also mentions that the Cultural Strategy's vision is based on "environmentally sustainable actions".

## Part 3: Areas for Improvement

### Local Plan in A Changing World

Whilst the plan does include some flexibility to adapt to changing circumstances, its provisions are not explicitly designed for major economic or unforeseen issues which is a concern.

#### Local Government Changes

**Medway Council** as the single local planning authority for the area. It outlines the council's role in preparing the plan, consulting with neighbouring authorities, and making decisions based on the plan. The plan's vision and policies are aligned with the "One Medway Council Plan 2024".

The focus of the document is on the plan's legal compliance, soundness, and strategic cooperation with neighbouring authorities like Maidstone Borough Council and Gravesham Borough Council on cross-border matters. This is done under the '**Duty to Cooperate**'.

However, the document does not discuss any structural changes to Medway's local government which is a major omission and should be addressed.

#### Adapting to Change

The Key Adaptability Mechanisms defined include

- **Review and Monitoring:** The plan states that it will be monitored and reviewed to ensure that its policies remain relevant and effective. This is a standard part of the planning process, allowing the council to assess the plan's performance and make updates as needed. This process would allow for adjustments if a new economic or social issue arose.
- **Contingency for Housing Delivery:** The plan includes a "contingency for housing delivery" in its strategy. It states that if specific housing allocations do not come forward as planned, the council will have a mechanism to release other sites to meet its housing targets. This provides a degree of flexibility in meeting a core objective of the plan.
- **"Duty to Cooperate":** The plan's adherence to the "**Duty to Cooperate**" with neighbouring authorities is another adaptive mechanism. This ensures that Medway works with other councils on cross-border issues, which would be essential in responding to a regional economic shock or other unforeseen event.
- **Site Allocations:** The plan's allocation of sites, particularly those for employment and housing, is designed to be as specific as possible while still allowing for some flexibility. For example, some employment sites are designated for "general employment" rather than a specific industry, which could allow them to be used for different types of businesses if economic conditions change.

While these mechanisms provide some adaptability, the plan is a static document by nature. It sets out a long-term vision and policies based on current information and assumptions and does not model the impact of high probability changes. A major, unforeseen economic crisis, a pandemic, or a new piece of national legislation could require a significant review or even a complete replacement of the plan, which is a lengthy process. The plan is therefore not a dynamic document designed for rapid, real-time adaptation. I strongly suggest some work is done to address this gap.

## Risk and Risk Management

Risk management is addressed in a detailed but thematic way rather than as a single, overarching strategy. It is particularly well-covered in areas related to environmental and infrastructure risks but less so in other areas.

### Key Areas of Risk Management

- **Climate Change and Environmental Risks:** The plan explicitly addresses Medway's vulnerability to climate change, including rising sea levels, flooding, and overheating. It outlines a clear strategy to build a "resilient future" by implementing policies to mitigate the effects of climate change on communities and the environment. It requires new development to contribute to this effort by reducing carbon emissions and adopting high sustainable building standards. It also addresses the risk of contaminated land with a policy (DM2) that requires all such land to be remediated prior to development.
- **Flood and Water Management:** Risk management in this area is a central theme, as the plan notes Medway is at "significant risk of surface water flooding". The document covers this extensively by detailing the roles of various flood risk management authorities. It uses a Strategic Flood Risk Assessment (SFRA) to inform site selection and avoid development in areas with a high risk of flooding where possible and states that development must not increase flood risk elsewhere and must include measures to manage any residual risks.
- **Infrastructure and Housing Delivery:** The plan includes measures to manage risks related to development and infrastructure provision. It has a "contingency for housing delivery" to ensure that housing targets are still met if allocated sites do not come forward as planned. It also includes policies to safeguard critical infrastructure, such as mineral supply wharves and waste management facilities, from new development that could interfere with their operation. The plan references a "Medway-wide Monitor and Management Mitigation Strategy" to deal with future uncertainties in travel patterns and manage risks associated with transport infrastructure.

### Coverage and Limitations

The plan therefore provides a strong framework for managing specific, foreseeable risks, particularly those related to the environment and the direct impacts of development. It relies on a process of monitoring and review to ensure the plan remains relevant and can adapt to changing circumstances.

However, the plan does not contain a single, comprehensive risk management strategy for all potential issues. Its approach is to embed risk mitigation into individual policies and assessments, rather than having a standalone section on general risk. This means it is less explicit about how it would adapt to major, unforeseen risks such as a new economic crisis or a pandemic.

I suggest work is done on a strategic risk management strategy with a well defined and costed risk mitigation and risk retirement plan.



## Model Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which this  
representation relates:

Medway Local Plan

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

#### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Paul"/>	<input type="text"/>
Last Name	<input type="text" value="Barden"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="ME2 REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>



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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="✓"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	No	<input type="text"/>

Please tick as appropriate

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The Labour Council were elected based on keeping Chatham Docks as vibrant working docks maintaining existing employment, the plan does not reflect this explicit commitment the council leader and others made as part of their election.

Even if it was to go ahead the policy does not include the necessary road/transport improvements

(Continue on a separate sheet /expand box if necessary)

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The docks are a major employer and of historical importance to Medway. This plan (and this policy) does not balance correctly employment and housing. Vibrant businesses like the ones here should be encouraged in the local plan, not forcibly closed like planned in this policy.

Notwithstanding that the policy is flawed: Trams are called out as one of the solutions (in the policy itself) but no mention is made anywhere else in the document, that would need to be an integrated transport solution across Medway

so surely it is missing from section 9 and needs to be added. To add that number of properties would require substantial road improvements. Medway Tunnel through to Four Elms roundabout and beyond do not have the capacity. Until suitable improvements are designed and made no new housing can be built. If businesses are forcibly close under this policy is no plan to move them elsewhere (at the councils cost), this needs to be included.

(Continue on a separate sheet /expand box if necessary)

3. To which part of the Local Plan does this representation relate?

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Infrastructure cannot cope now, Medway council asked for money previously (the £170m) as they said in the application that the Hoo peninsula cannot cope with any more houses without transport improvements. Yet then continued to authorise building without the promised road improvements that have never been progressed. Plans to upgrade key bottlenecks like Four Elms have been in play for 15 years+ but Medway have spent millions and delivered nothing. Some S106 funding already exists for this but nothing being progressed. As has been proved a few times recently accidents can gridlock the single access road into the peninsula (A289, Four Elms Roundabout, A228 Four Elms Hill.

Building 30% of the new housing here is wrong given the amount of environmental protected sites (SSSI etc.) here, this is the reasons there is little housing.

(Continue on a separate sheet /expand box if necessary)

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No further development on Hoo peninsular until the right road (and rail) infrastructure has been upgraded to cope with current traffic levels. Then further houses can only be allowed when road etc infrastructure is upgraded to cope with current and future needs, this must be done prior to any further building and covered by policy. The current approach where Medway agree 10 houses here under 1 application, 10 houses under another separate application etc. cannot continue as the cumulative effect is a lot of extra cars on the road.

The rail station should be a key part of this, it was only cancelled as Medway ran out of funding not because of a lack of need. This should also include a station at Grain to ensure viability and the chord towards Gravesend, the plan should reflect this. The necessity of this should be stated in the plan, a must not a loose maybe. People will only switch off cars should there be a viable alternative in place, 4 buses a day to a village (e.g. Upnor) is not viable for anyone working so cannot be claimed as mitigation.

30% target for the peninsular is wrong, this needs to be reduced and rebalanced towards less environmentally protected parts of Medway. For example sites like Capstone Valley could accommodate more to stop this, they are less protected and have large populations already easily expanded. Medway councillors continued opposition to building in areas of Chatham like Capstone etc. does not make sense at face value and needs to be explored further by the planning inspector in my opinion as the logic does not hold up. Current and past administrations push the majority of building in Hoo but most of us cannot see the logic.

(Continue on a separate sheet /expand box if necessary)

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Getting rid of existing businesses is wrong, these are people's jobs and some will clearly shut. Making people unemployed to clear a site for housing, shutting business to build houses, is just wrong. The local plan must balance employment with housing need and does not.

(Continue on a separate sheet /expand box if necessary)

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One that does not cause business costs, closures and redundancies. There is no justification for closing (or limiting) this as a business zone. Sites like Capstone Valley could accommodate more housing to stop this.

Infrastructure is insufficient here, the plan should be addressing that. It is impossible to get off the site in rush hour already, this must be resolved as part of the plan. If housing is progressed, then appropriate road (and rail) infrastructure must be in place before the first property is built. And any costs to business because of a forcible move must be borne by the council

(Continue on a separate sheet /expand box if necessary)

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☒

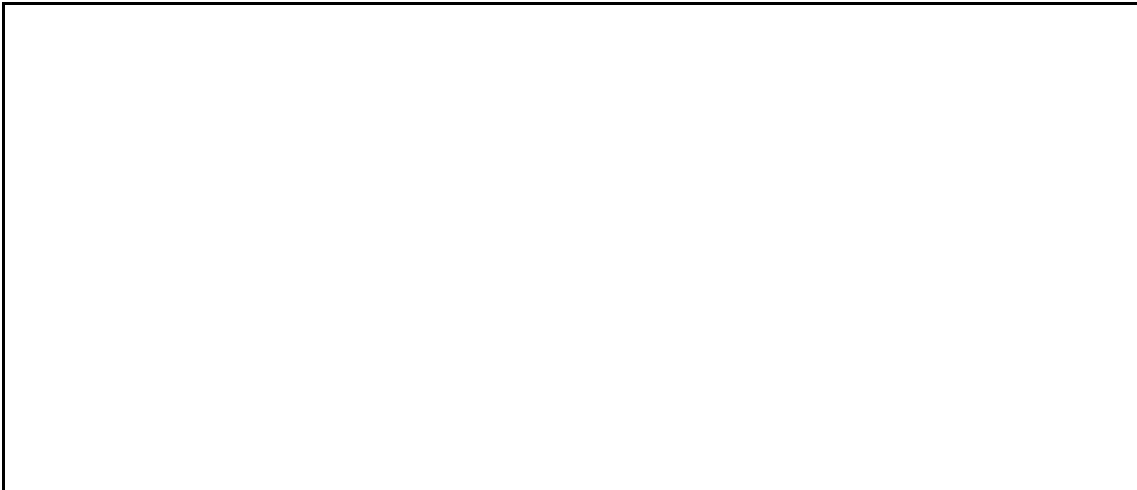
**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

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***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**For details of our data privacy policy please see:**

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>