

From Mrs J.P. Eastham

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ME3

17 August 2025

I object to the 'Street North Development', And in particular Development SNF3 behind Brompton Farm Road and Dillywood Lane - for the reasons listed below. Thank you!

- A) I live at Dillywood Corner, the property (corner plot) faces Dillywood Lane, the Side Gravesend Road - Under Gravesend Council, and I believe the proposed site comes at it crosses over borders with Gravesend Council's residents? Gravesend Council on board with this plan, as they have not notified
- B) I understand one at the entrance to the Development/Building site road be Dillywood Lane. This is a very narrow lane to which the surface is not suitable for heavy traffic. Additionally 2 cars in the opposite direction cannot pass each other - one has to reverse. It is an Unlit Lane. The houses in the No Main Drains - we all have cess pit drainage.

Question 2)

Are you going to magic - Main drainage and street lighting.
If so! I can only imagine the "Horrific" disruption and time.
If at all possible?

- C) The proposal not only affects residents, who have worked hard, paid mortgages, but affects farm hand - to which we need food and additional "Green Belt" land.
- The notion of Green Belt has existed since before the 1940's, at which point to create a 'Buffer' around built up areas to prevent "Urban Sprawl". Safeguard the countryside and preserve the character of historic towns - Rochester is historic. For local planners to authorise building over agricultural and Green Belt Land is not to meet exceptional circumstances, in this instance!
- But a blatant choice, by civil servant, and people elected to serve. Not destroy.

Please reconsider!

C) Continued

You may try to justify as much needed housing 'who for'.

We do know that we are being swamped by immigration - both illegal and legal, but there are enough 'grey belt' - 'Brown Belt' land. to build on - without concrete over Farm land - Food Supply - & Green Belt plus Local People don't often get housed in these developments -

Question 3)

How many people are going to reside in these proposed dwellings?

1, 2, 3 or 4 or more to each dwelling - we need to know.

Question 4)

Do you have a priority list for Social Housing - as they do in many areas and Category A priority is; 'Asylum Seekers'.

Homeless which is factual that many failed Asylum Seekers are presented as homeless and if they have children have to be housed vulnerable; includes people from prison.

Question 5)

How many hard working local people, who are on the list for Social Housing and Not Under Category A - will be given one? And / or are they just going on the open market at an extremely high price.

D) many people living in properties whose gardens back onto this proposed development - will no doubt - more or less be unable to tolerate the Building Noise / Dust / Dirt, affect their living / Health and by doing so may see their property devalued, by the 'big estate'.

Question 6)

Are you going to compensate us?

D)

Given the Adults / children being housed in these dwellings. How many do you propose?

Numbers affect school applications - where are they going to be educated. NHS services -- 3 weeks to see a Dr - to find a NHS Rental in Naeon. Impossible

Work - whose is the work?

Question 7). How many people will reside in your proposed Dwellings, and how are they going to be educated and access health care etc.

E)

We are supposed to protect our Environment and wildlife too.

Have you all forgotten Croydon memories (if Home?) about Covid, and the detrimental affect it had on people. All confined to their homes. But once certain restrictions were killed many could venture outside, walking along the block at Dillywood Lane, Brompton Farm Road, Rode Common. Open spaces and Footpaths through the farm lane etc. Protected a 'good level' and great for mental health - breathing in fresh air.

Question 8)

Are you happy to Concrete over Farm land - Green Belt which changes our Culture, and part of the 'Garden of England' deny people fresh air and open space and hinders Food production.

Question 9)

Is it actually legal as planners not to notify residents, people affected, by Hard printed post - place Donk in usual me by saying your saving paper - because what you are doing by 'Everyone has to be digital' View email or facebook etc is actually disregarding senior citizens of this Niesh borough, who are not 'up to scratch' with digital 'age' - But paid their taxes and had no knowledge of your plans.

Except for the kind Nieshbor who told us.

F)

As public servants is it legal not to notify an affected?

Q)

Wild Life -

Question 10) Are you aware that whilst we as Humans are supposed to protect our Environment by Councils, over the proposed Land for Development - you will be responsible for the fleeing, & Trauma, disturbance to the following Wildlife, which have frequented this property regularly for over 25 years we have hawks, and our garden backs into your proposal. We named them

Billy the BAT - Come from the Field/Barns

Harry the Hedgehog and his family

Harry the Hawk

Henry the Heron

Foxy the Fox

Jimmy the Grouse

Stanley the Squirrel

Woody the Woodpecker

Robert the Robin

Filly the pheasant

Bertie the Buzzard

Kenny the Kestrel

Ronnie the Rabbit (and his family) & the black

we also have, butterflies, magpies, Blue tits, Fringes, 2 Jays, ladybirds, Bees, wasps, spiders, to name But a few -

Are you happy to destroy them all and or terrouse them by building

Question 11) is it actually legal, to destroy wildlife?

Please excuse - hand written but I do not have a Computer.

Penny - Mrs. J. P. Eastlake - The above is my objections

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

As a Linwood Avenue resident, I am writing to strongly object to the proposed conversion of Strood's Greenbelt to Greybelt and the related Medway Local Plan's housing development Policy SA6 "Land West of Strood".

I have lived in Strood all my life and quite frankly I am appalled by the proposals to build on this Greenbelt land.

The Medway Local Plan relating to the downgrading of this area of Greenbelt Land to Greybelt is not "sound" based on National Planning Policy Framework.

National Planning Policy Framework

This greenbelt area is now the only surviving greenbelt in this part of Strood and it is a precious part of our area that should be protected as such. The NPPF places great importance on Greenbelt Land, and it clearly states,

"Greenbelt boundaries should only be altered where exceptional circumstances are fully evidenced and justified".

What exactly are the exceptional circumstances relating to this proposed change from Greenbelt to Greybelt?

At no point has any "exceptional circumstance" been identified in the Medway Local Plan or explained in person by any member of Medway Council at Local Plan meetings.

This is highly concerning as there are significant other alternatives within Medway where housing developments could be built. There are sufficient brownfield areas and areas of under-utilised land that have simply been ignored by Medway Council.

According to the NPPF, the strategy should,

"make as much use as possible of suitable brownfield sites and underutilised land"

Why does the Medway Local Plan not include any of these alternatives?

There is so much guidance regarding Greenbelt, and its importance in the NPPF and it has been completely ignored and disregarded by Medway's Local Plan.

Medway's proposal of reclassifying this Greenbelt land as Greybelt is outrageous.

It is very important agricultural land which needs to remain so.

When I attended a Local Plan meeting recently, I asked one of the planning officers how this assessment of the land had been made. She explained it was visited by a group from Medway Council. This should not have been the case and needs further investigation.

Any such assessment should be carried out by independent officers.

This land change is simply an easy option for Medway Council with complete disregard for the beauty, importance of the Greenbelt land and complete disregard for the residents who live in this area.

There is a vast amount of wildlife on this Greenbelt land and there have been insufficient assessments and studies carried out by Medway Council. Local residents and local protection societies have gathered lots of evidence supporting this.

There is a considerable amount of guidance in the NPPF regarding habitats and biodiversity.

The NPPF point 193, states that,

“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), then planning permission should be refused”.

The studies carried out (in the accompanying documents to the Medway Local Plan) are poor and inadequate and there are suitable alternative brownfield sites available in Medway with nowhere near this level of biodiversity.

This whole area already suffers significantly with regular traffic problems.

In addition to this, any accidents on major nearby roads, such as the A2, M2 and Bypass mean that all vehicles are diverted onto Rede Court Road, Brompton Farm Road and Gravesend Road. A simple five minute journey recently took me 46 minutes when the local roads were gridlocked.

The proposed housing development would massively worsen this situation, meaning thousands more cars would be using these roads. Our roads cannot cope as it is.

Our local GP surgeries will simply not be able to cope with the increase in patient numbers.

One of the housing development catchment surgeries, Highparks in Higham is going to be closing very soon. In another of the catchment surgeries, one GP has more than 16,000 patients. Some of our residents in and around Rede Court Road have family members within their house who have to use different GP surgeries.

How will our local GP surgeries manage thousands more patients?

Our local schools have insufficient places for potentially thousands more school-aged children. Most of our local Primary Schools have year groups already full to capacity, and there are high levels of SEND children in all of our local Primary schools. There quite simply are not enough school places for children of all these new residents.

Building houses on this area of Greenbelt land would create devastating environmental problems for existing residents.

There would be a significant issue with light pollution as the proposed area is a “dark sky area”. Areas that are dark sky areas are protected as such.

Air pollution would be a significant factor as the regular heavy traffic adversely affects air quality. This will considerably worsen if the building development goes ahead.


Where is the evidence of a full Air Quality test?

As an Authority, you have a duty to your residents and there are significant safeguarding issues that will be caused by this proposed building development going ahead for all who live in this area.

I hope my strongly felt objections will be carefully considered by an Independent Planning Inspector.

Natalie Hale

Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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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 11th August 2025

Email: 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="Justine"/>	<input type="text"/>
Last Name	<input type="text" value="Percy"/>	<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"/>

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

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.

Both my husband and I have lived in Strood since birth and have sadly witnessed the gradual reduction of our Green Belt landscape over the decades. This increase in yet 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 A289 roads. The assumption that residents in the future will opt for public transport over their own private vehicles is also inaccurate and building this many more houses will lead to extensive traffic regardless of how many more buses you propose – people want their independence and convenience of their own cars.

Also 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 assumption that residents will opt for public transport over their own private vehicles is also inaccurate and building this many more houses will lead to extensive traffic regardless of how many more buses you propose – people like their independence and convenience of their own cars.

If housing is needed in Medway, for the Medway community what guarantees do the local community have that they will be for local people and not bought up by those currently living in London? This should especially be enforced for the Social Housing percentage of the new builds, that they specifically go to Medway people and not allowed to be taken up by other boroughs.

Local healthcare is already at capacity, with access to GP appointments very limited and High Parks Medical Practice already closing one of its four surgeries in Higham will put additional pressure on the remaining 3 surgeries. Medway hospital is the only major hospital in the area and is beyond capacity now with many patients waiting in corridors for 15+ hours which only adds to their suffering and dignity.

I personally enjoy using the public footpaths through the farmland behind Brompton Farm Road, watching the varied wildlife which is recognised by Kent Wildlife Trust – all of which will disappear as a result of these housing developments.

The added noise, air and light pollution does not seem to have been adequately addressed. Rede Court and Brompton Farm Road are already much busier now due to the increase in local traffic so access to these new developments is going to make these roads gridlocked. The air pollution is already going to be severely compromised by the LTC when that is being built let alone when the predicted 13m cars a day pass through Medway.

I cannot clearly see what rules developers will need to abide by when building these houses and what they will actually be building. Schools, doctors, dentist, parks etc. Can you ensure they build the necessary amenities first, before they build the houses and before they run out of money (which they often do). Flooding is not uncommon in the farm fields so ensuring adequate water table provisions also.

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.

Personally, both my husband and I plan to retire next year having spent the past 10 years renovating our property and garden. Our retirement plans were to stay in our home and enjoy the walks, nature and open spaces on our doorstep. However, these development plans are deeply upsetting and may completely change where we planned to retire. We both have elderly parents locally (along with siblings, family and friends) and had envisaged we would be around the corner to help them more, however the mental anxiety of losing the open spaces and farmland to new housing estates, increased traffic and noise pollution is really making us consider moving away from Medway. However, it angers me that this is our birthplace and why should we have to move to seek what we have already elsewhere, when we are the ones that have invested our hard-earned money and lives in this area and community.

(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.

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.

(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)?

X

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>

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Part A

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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	Mrs	
First Name	elaine	
Last Name	cutting	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code	Me3	
Telephone Number		
E-mail Address (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 Policies Map

4. Do you consider the Local Plan is :

					x
4.(1) Legally compliant	Yes		No		
4.(2) Sound	Yes		No		x
4 (3) Complies with the Duty to co-operate	Yes		No		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.

Development before infrastructure is unsound. The Peninsula already is overdeveloped without new infrastructure. Doctors Services are over subscribed and are not serving the communities. Public Transport is Poor. Educational establishment cannot keep up with the development and the needs of the children. The plan fails to take into account the adopted Hoo St Werburgh & Chattenden Neighbourhood Plan. In fact it mostly ignores it and disregards adopted policies. Reliant on section 106 money that will not cover the costs for new infrastructure. This will in no way cover the costs of a major new road network.

(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.

All housing development be paused until road infrastructure in place. Any development to align with the needs of the villages.

(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.*

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☐

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:

To ensure our voice is heard against an unworkable document that has failed to address residents issues now , in the future and in the past.. Our voices are being ignored

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.

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From: [REDACTED]
To: [policy, planning](#)
Subject: Medway Local Plan response
Date: 11 August 2025 18:23:06

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

Dear Sirs,

We wish to vociferously object to the following reference the Local Plan:

We object most strongly to the scale of possible development on the Hoo Peninsula, particularly Chattenden, Hoo and High Halstow.

The quantity of housing proposed at these sites are far from a simple percentage growth other areas are allocated with. These have been effectively dumped on us as an easy target.

Shame on the council! The Hoo Peninsular is an asset for ALL of Medway, and Medway Council should use it's planning tools to enhance the area, not dump an overbearing quantity of housing here.

Further you seemingly have no qualms about allowing development on productive farmland! Do you have no concerns about food security? Who knows how the world will develop in the future. You are after all seemingly taking 'climate change' into account.

Perhaps you ought to consider taking steps to make the Hoo Peninsular a national park; the nearest to London?

I hope you take our comments seriously, and not just brush them aside.

Your sincerely,

Peter and Val Richardson

[REDACTED], ME3 [REDACTED]

From: [REDACTED]
To: [policy, planning](#)
Cc: [REDACTED]
Subject: Medway Plan Consultation
Date: 12 August 2025 02:37:45

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

Medway Plan

We are appalled that Medway Council is considering concreting over the entire Capstone Valley for future housing development.

As local residents, we have fought this notion for the past 40 years giving all the reasons why we should be conserving our farmland for the nations food; caring for the wildlife habitats & biodiversity of this unique rural area; not to mention the prevention of coalescence of neighbourhoods & maintenance of a place of peace & harmony for the wellbeing of Medway's residents with its current beautiful vistas across to the Kent North Downs. The Capstone Valley is currently designated as a place of rural importance, providing access to the Kent North Downs Area of Outstanding Beauty and its other Special Areas of Scientific Value.

No thought has been given to the provision of the infrastructure in this area including water, waste water & drainage in a valley already susceptible to severe flooding; roads, where country lanes & tracks currently exist; education & health, both of which are currently struggling with the recent influx of people from London.

The roads are far too narrow in the area to accommodate any additional traffic attempting to access the Motorway system or wishing to drive through the Medway towns, on narrow Victorian roads with traditional on-street housing, to access the railway stations. The current traffic flows are already at a standstill, especially at peak times, and the buses are very unreliable, which further encourages car usage. The valley will become heavily polluted in terms of aggravated light, noise & air pollution, which will be the death-knell to the current abundance of wildlife: bats; owls; geese; a variety of birds & pollinators; hedgehogs; foxes; flora.

We totally disagree with the statement @ 14.8.4 "Much of the land around Capstone Farm Country Park is agricultural, which has limited biodiversity value and public access."

The agricultural land currently supports wheat & vegetable crops. There is tremendous biodiversity within the Capstone Valley. There is good public access via existing footpaths & bridle ways.

Development in these areas would not improve the rural biodiversity and properties would be high-end and unaffordable for the existing local populace.

This is an ill-thought out plan and in our opinion is not compliant & sound. Medway Planning should be ashamed of itself, as should the government for forcing this type of development onto local councils.

Mr RM Gollay



ME5



Sent from my iPhone

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Local Plan Publication Stage Representation Form

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

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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	MR	
First Name	PAUL	
Last Name	BUTCHER	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code	ME2	
Telephone Number		
E-mail Address (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

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

☒

4.(2) Sound

Yes

No

☒

4 (3) Complies with the
Duty to co-operate

Yes

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.

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Duty to Cooperate Compliance - Challenge

The area of concern is Strood North, aka West, which borders with Gravesham BC.

In Local Plan (Section 14.7) they are given references in the Policies Map 2025 of SNF1 & SNF3 and in the Duty to Cooperate Statement (Section 4 Green Belt) and in the Green Belt Review Land Parcels 1,2,3,4,5 & 6 (sections 3.1 - 3.6). However other maps show these neighbouring plots as SNF1-6 so difficult to give correct assignments and may have mislead other's comments.

Land Parcel 2 = SNF1.

Land Parcel 3 = SNF3.

Land Parcel 4 = SRF5.

I believe that DtC is incomplete and therefore unsound. My reasons are as follow;

Medway have published as per their reports referring to Gravesham plans but Gravesham are still in Section 18 and have not published Section 19 so cannot confirm those plans.

Two plans given by Medway show different plans for the same plot of Gravesham land listed. One with houses and another with schools and infrastructure. I am unable to locate any current Gravesham plans. The last Gravesham plan was dated 2014.

It has been reported recently that the Gravesham MP has suggested a different proposal.

I believe any DtC should present the agreed plans from both parties duly confirmed/signed by both Councils to both Local Plans like any agreed contract.

With regard to Water I believe their long term (up to 2070) plans do not coincide with Medway's for this area and do not hold another meeting until 25/11/25.

Local Plan Sound Challenge

The area of concern is Strood North, aka West, which borders with Gravesham BC.

In Local Plan (Section 14.7) they are given references in the Policies Map 2025 of SNF1 & SNF3 and in the Duty to Cooperate Statement (Section 4 Green Belt) and in the Green Belt Review Land Parcels 1,2,3,4,5 & 6 (sections 3.1 - 3.6). However other, earlier, maps show these neighbouring plots as SNF1-6 so difficult to give correct assignments and may have mislead other's comments.

Land Parcel 2 = SNF1.

Land Parcel 3 = SNF3.

Land Parcel 4 = SRF5.

I believe that LP is wrong, incomplete and therefore unsound. My reasons are as follow;

The area in question has made assumptions based upon Gravesham Plan (still in Section 18) under the remit of the Duty to Cooperate. However I challenge that DtC soundness and therefore I believe such plans are premature.

Several of the plots of land (SNF1,3 & SR5 – Land Parcels 2,3,4) are Green Belt. Based upon what Gravesham are believed to plan then Medway have reported (Medway Green Belt Review) that the NPPF key purposes of

B. To prevent neighbouring towns merging into one another; is WEAK

However I feel the green land coupled with the A289 makes these STRONG.

For Plot SNF1 Land Plot 2 I believe should also be STRONG because it is implied by Medway that the Gravesham Plan with have new road traversing their adjacent Gravesham plot. Thus adding a new physical boundary to green belt.

For Land Parcel 1 (also part of 2) the border runs in part along the back fences of Medway residents. I believe that Gravesham should not be allowed to infringe the Green Belt here or at least present some form of green corridor.

Much of Medway planning in this area is based upon the premise that they must regrade the land as Grey and release it for development because Gravesham will do likewise. And if they do not then Gravesham will apply for the same land to be downgraded and released. However I think Gravesham should adhere to the same NPPF rules and keep a green corridor.

A recent development application for SNF1 was refused in 2020 for many reasons. The arguments for such objections have not changed and are still valid.

One such point is the Airplane fuel pipeline that runs through of SNF2 at the back of the Medway houses. It continues in both directions under the plots of land on either side plus the adjacent Gravesham land. It forbids any construction within a certain distance.

Medway councillors speak of the need for people to step outside of the homes and take a walk into the green areas for health. These tracts of land provide that respite in the area. The development will remove it completely. The option would be drive to some other area. The wild life would be lost when we are trying to encourage its growth and wellbeing. Prime agriculture land will be lost at the same time as country we are trying to be food sustainable.

Currently this area has poor Air Quality. As traffic grows with other housing developments in both Gravesham and Medway coupled with the Lower Thames Crossing and increase traffic on the M2/A2 from easterly developments this likely to increase significantly. At present this is mitigated by Green Lungs the Green Belt plots provide. Once lost nothing will stop the pollution spread.

The Environment Agency cites some areas this Green Belt as Protected Fresh Water (North Kent Medway Chalk & Aquifers).

That has been largely been ignored and the issue passed to the Water Companies. However the water companies in their plans to capture more water with proposed 'Catchment' areas in order to relieve the expected water shortage through climate change. Not sure both development and catchment plans can coexist. Introducing buildings will exacerbate this shortage and may harm the aquifers that provide this area with large portion of its fresh water.

I believe both councils should not include lands around A289 until there is a better understanding on the North Kent Unitary Reform, Water and Sewage, Infrastructure plans plus to review these lands and house numbers in 2-3 years and inform the government accordingly.

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

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Contained within previous section 5. In conclusion it will be prudent to wait for Gravesham to reading for their Section Drafts and review what is planned and re-challenge Medway Green Belt areas.

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

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

☐

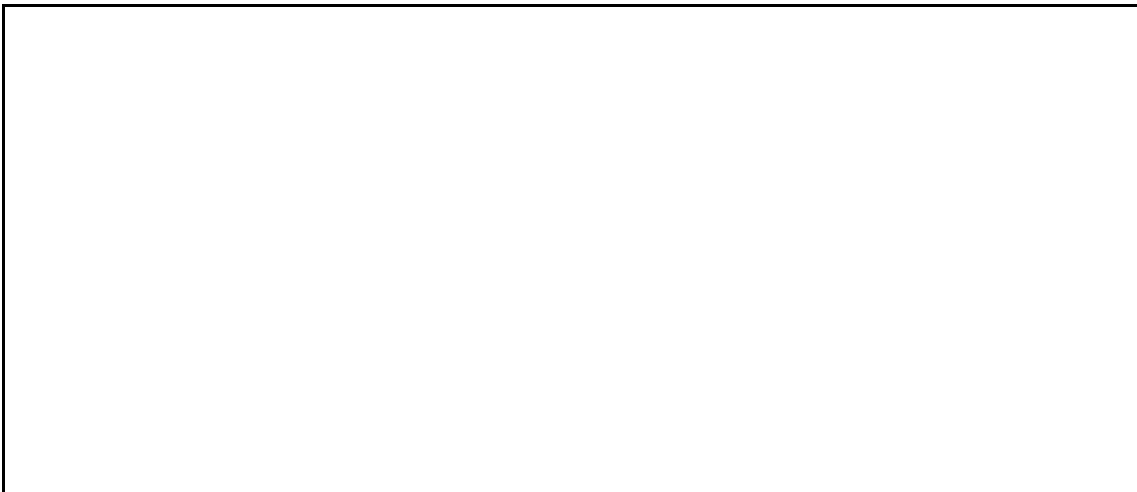
No, I do not wish to participate in hearing session(s)

☐

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

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

From: [REDACTED]
To: [policy, planning](#)
Subject: RE: Medway Local Plan - Section 19 Publication Stage Representation Form
Date: 11 August 2025 18:58:48
Attachments: [Medway Local Plan - P Butcher's Representation Form.docx](#)

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

Sorry forgot to add NO to hearing Session.

Thank You please confirm receipt

From: Paul Butcher [mailto:[REDACTED]]
Sent: 11 August 2025 18:44
To: 'planning.policy@medway.gov.uk' <planning.policy@medway.gov.uk>
Subject: Medway Local Plan - Section 19 Publication Stage Representation Form

Thank You please confirm receipt

Model Representation Form for Local Plans



Local Plan Publication Stage Representation Form

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

Part A

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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="Nicholas"/>	<input type="text"/>
Last Name	<input type="text" value="Dowling"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Architect"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<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" value="y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>

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

In order to plan effectively for improving the life expectancy of people within Medway Council (MC) and improve their healthy life expectancy the local plan needs to proactively address masterplan principles which incorporate active transport modes as part of their inherent design intentions. There are a number of alternative models which specifically centre new development on public transport hubs focusing dense urban development within 15 minutes' walk these hubs. Thereby encouraging the use of sustainable public transport modes of travel in combination with active modes of transport. Whilst it is noted that the Regulation 19 local plan aspires to encouraging active transport modes of travel within the general populace it is very unclear on how this is achieved. Scholars of Sustainable urban master planning including Moreno (Moreno et al., 2021) and Carlton (Carlton & Org, 2009) offer models which through the proximity and interaction between residents and infrastructure actively encourage the take up of active transport. The reason this is important specifically to the issue of improving the health of the residents of Medway is explained and summarised by Lloyd Alter in a number of articles on the health benefits of active transport in both older and younger generations. (Alter. L, 2025b) (Alter. L, 2025a)

Bibliography

- Alter. L. (2025a, July 23). *Bikes are a miracle pill for older adults, but they won't take it unless they feel safe*. <https://lloydalter.substack.com/p/bikes-are-a-miracle-pill-for-older>
- Alter. L. (2025b, July 30). *Cycling is a magic pill for dementia - by Lloyd Alter*. <https://lloydalter.substack.com/p/cycling-is-a-magic-pill-for-dementia>
- Carlton, I., & Ong, E. (2009). *UC Berkeley IURD Working Paper Series Title Histories of Transit-Oriented Development: Perspectives on the Development of the TOD Concept Publication Date*.
- Moreno, C., Allam, Z., Chabaud, D., Gall, C., & Pratlong, F. (2021). *Introducing the "15-Minute City": Sustainability, Resilience and Place Identity in Future Post-Pandemic Cities*. <https://doi.org/10.3390/smartcities>

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In order to resolve the pressing potential health crisis in the UK in addition to the predicted catastrophic impacts of Climate Change if we as a society do not achieve nett zero by 2050 Medway Council need to adopt sustainable master planning models. The principles and tools included within these models should be used to guide policy and inform site allocations in order to achieve the most sustainable outcome for Medway in the 2041 Local Plan.

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

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☐ Y

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Name or Organisation:

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Medway's current stated position on their 5YHLS as of the 30 March 2024 stands at 3.41 years. Therefore, government standard assessment and NPPF requires that A 20% buffer is applied to the proposed housing projection to ensure flexibility of housing supply over the plan period.

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Medway should adjust their housing projections to take into account national policy.

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Part A

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Last Name	<input type="text" value="Dowling"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Architect"/>	<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" value="y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="y"/>	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.

Whilst it is accepted in principle that there has been cross boundary working between Medway City Council and Gravesham Borough Council, the evidence as to what form of discussions were had, what was discussed and what agreements were reached during these discussions remains opaque. One could take the view that this is of little weight within the evidence base of the local plan. However, the following points indicate that this evidence is vital in order to accurately assess the soundness of the Medway Local Plan.

1. The Medway Local Plan is being promoted upon the basis West of Strood forming a sizable allocation of development for housing in conjunction with Gravesham Borough Council on the adjacent Chapter Farm. The allocation for this key part of the local plan is predicated upon the assumption that GBC will allocate Chapter Farm in their regulation 19 submission.
2. Given that the planning process is a democratic one, GBC council will need to vote upon the proposed local plan prior to submitting their regulation 19 submission to PINS. As this vote is not predicted to take place until September 2025 two questions arise as follows
 - a. If GBC have confirmed that they will allocate Chapter Farm in their regulation submission prior to the democratic adoption of the plan there is a procedural short cut of the planning process as well as a disturbing democratic deficit.
 - b. If GBC have not confirmed that they will allocate Chapter Farm in the regulation 19 submission (because they have not voted to do so

as yet) then Medway are proposing an allocation which on its own lack's justification in a procedural and planning level.

Either way there is a procedural deficit in one or both of the plans unless Medway and GBC can prove otherwise.

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.

Medway and GBC should make full disclosure of the basis on which the cross boarder consultation has been undertaken and developed.

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

☐ Y

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Name or Organisation:

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2.2 Policy Policies Map

4. Do you consider the Local Plan is :

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4.(2) Sound Yes No

4 (3) Complies with the
Duty to co-operate Yes No

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With reference to the five purposes of green belt I refer to my response 1.2.6

With reference to the validity of basing the Medway plan upon allocation of a site in adjacent Local Plan area which has yet to be adopted and the difficulty that this poses in procedural terms as well as democratic deficit I refer to my response in 1.4.3

With reference to Medway's statement that this allocation represents a more sustainable location we note there is no evidence to back up this claim in terms of

- Sustainable master planning principles
- Comparison with other sites in terms of
 - CO2 emissions
 - Active travel
 - Use of existing public transport
 - Biodiversity and ecology
 - Impact on air quality
 - Mixed use walkable districts
 - Direct cycle and footpaths to Strood and Rochester town centre
 - Provision of a dedicated and identified fast track bus link road to the centres of Strood and Rochester

In our opinion the current position lacks credibility and viability due to

- Poorly researched options for alternative sites in the Green Belt
- Assumptions based upon unevidenced discussions with GBC

- Reliance on an unpublished plan (GBC) and evidence base
- A lack of holistic green belt assessment across the GBC/Medway green belt taking into account the effects of urbanisation west of Strood and the closing of the gap between Strood and Higham from 1.2 Km by 2/3rds to a distance of .44 Km (less than 2 minutes travel time by car)

Our position is that currently Medway Borough Council have not submitted adequate evidence to prove that the proposed site west of Strood complies with green belt policy and grey belt planning guidance to prove that other sites are more or less viable than other sites in this key gap in the metropolitan green belt.

I would refer the inspector to the following findings in the Tonbridge Wells Local plan process where the inspector faced a similar lack of evidence for a proposed allocation within the green belt

Finally, we attach below an extract of google maps showing proposed development areas within the Medway local plan in order to visually represent the impact on the green belt of the proposed regulation 19 plan. As outlined above.

Image 1: Before proposed joint allocation

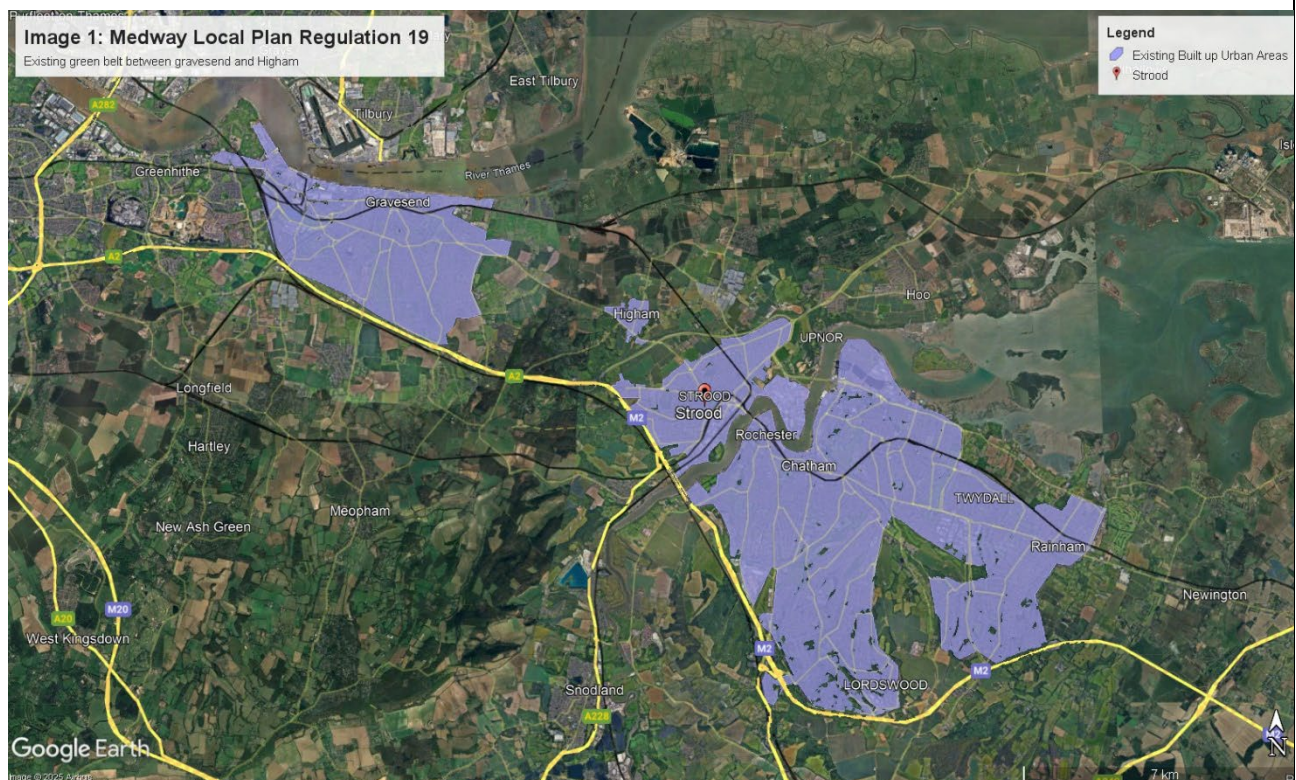
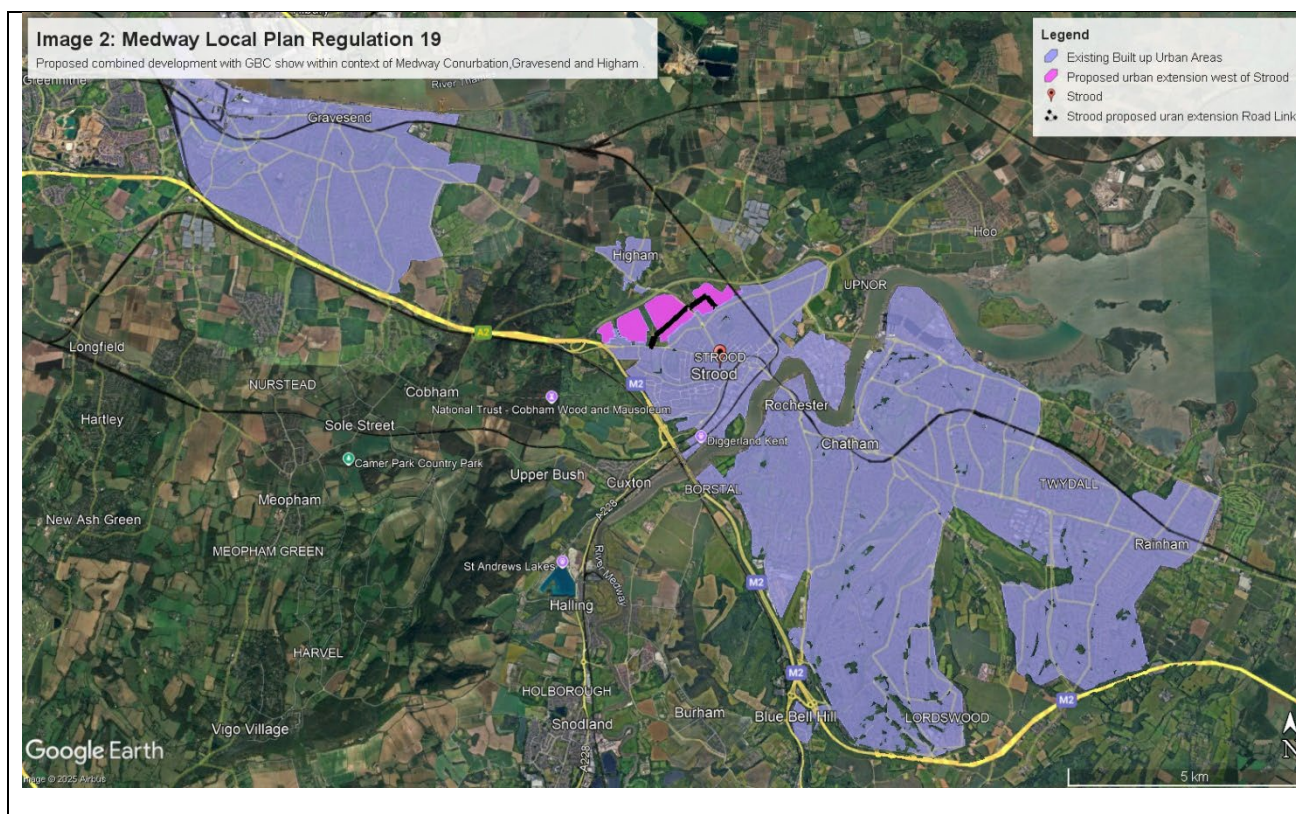


Image 2: after proposed joint allocation



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Prior to continuing with the proposed allocation of the sites west of Strood there is a large amount of research and evidence gathering which needs to be undertaken in order to make the local plan sound. The method by which the planning inspector for the Tonbridge and Malling Local Plan offers viable way in which this can be achieved without delaying the local plan as a whole.

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☐ Y

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Currently as the regulation 19 evidence base stands this policy cannot be implemented as the required air quality assessments on which this policy is based have not been completed. This is a major failure in the provision of key evidence.

Currently site allocations have been made across Medway without the necessary evidence base as to the impact of these allocations on the air quality management zones. For example, the proposed allocation of upto 4,000 homes west of Strood will directly impact the central Medway AQMA as well as the Gravesham A2 AQMA.

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The aspiration for a new rail link to Hoo is noted. The principles on which this is predicated are sound, i.e. reduction of single car use and congestion, reduction of pollution and improvement of air quality, increase in active travel via dedicated walkways and cycle paths and linking of active travel to public transport and a sustainable mode of transport i.e. railway.

However, it is noted that all previous attempts to achieve this have failed due to mismanagement of grant applications and or lack of funding.

It is also noted that the sound principles of locating development in rural areas adjacent to railway stations are not replicated in the cross border conversations west of Strood.

The inability of the Medway plan to comprehensively and to apply sustainable transport and development allocation policies across the plan act to undermine the very foundation on which the plan is promoted.

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the local plan should look to enhance development opportunities adjacent to existing railway stations rather than hope that one day they will be able to fund a new rail line.

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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="DA12 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?

2.2

S1

 Policy

Spatial development strategy

 Policies Map

--

4. Do you consider the Local Plan is :

4.(1) Legally compliant Yes

Y

 No

--

4.(2) Sound Yes

--

 No

N

4 (3) Complies with the
Duty to co-operate Yes

Y

 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.

The Omission of any reference to sustainable master planning models of development which actively promote and are designed to

- Centre development on existing public transport hubs
- Increase active travel (thereby supporting policy T27)
- Reduce CO2 emissions due to use of the private car
- Encourage mixed use development thereby reducing the need to commute
- Social / infrastructure resilience

Medway could have chosen to explore any number of sustainable planning models to help inform and sculpt their allocations policy, including any of the following

- 15 minute city model
- Transit city model
- Smart city model
- Nature centred master planning

Given the time pressure to achieve net zero by 2050 this omission is a fundamental flaw in the current drafting of the Local Plan.

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.

Prior to continuing with the allocation of the sites west of Strood there is a large amount of research and evidence gathering which needs to be undertaken in order to make the local plan sound.

)

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.

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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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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 11th August 2025

Email: planning.policy@medway.gov.uk or post to:

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

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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="Nicholas"/>	<input type="text"/>
Last Name	<input type="text" value="Dowling"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Architect"/>	<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="DA12 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?

2.2 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4 (3) Complies with the
Duty to co-operate Yes 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.

Green Belt policy:

The current wording of the green belt policy has not been consulted upon. The regulation 18 consultation (2023) was based on the principle of protection of the green belt within the Medway local Plan. The basis of this argument was that the small section of metropolitan green belt which fell within the Medway local plan area fulfilled purposes A B C and E of Green belt policy and was therefore important at a local, regional and national level. This position found widespread support within the local community.

Since then, there has been NO further consultation on green belt policy. Therefore, the current wording of the green belt policy is procedurally unsound as it has not been consulted upon by the public as required by the NPPF.

Regulation 19 is not a local Authority consultation process and therefore Medway will not consider any evidence submitted on the current wording. This lack of procedural rigour which we have commented upon throughout our representations gives us the impression that the current Regulation 19 submission has been rushed in order not to fall foul of the government requirement to submit local plans within a set and determined period. Whilst this is understandable the lack of a solid evidence bases which should accompany the regulation 19 submission is in our view detrimental to the case being made by Medway both in terms of specific allocations, especially within the green belt, and the plan as a whole.

Medway it would seem have recognised that procedural deficit and have tried to fill it with the 2025 green belt site assesement document, undertaken by them and reviewed by a third party.

An initial assessment of the 2025 green belt assessment shows that:

- The assessment of sites on a plot by plot basis is taken as sufficient evidence of the impact that development would have upon the green belt as a whole. This position understates the impact of the potential development of the plot by limiting the assessment to a singular plot ignoring the overall impact of the development plot within a larger and broader development scenario. i.e. the impact that plot 3 developed on its own will have on the green belt is a very different matter if it is to be developed in conjunction with plots 4, 5. Therefore the assessment made for each of the plots individually do not hold true if they are developed together especially in terms of the first purpose of green belt preventing urban sprawl. Refer to attached detail plan.
- The assessment of plots 1,2,3,4 and 5 seem to be looked on more favourably in terms of the assessment criteria when compared to plots 10,11,14 and 15 which have very similar characteristics yet very different conclusions.
- The implication of closing the gap between Strood and Higham has been ignored despite the clear fact that development of sites 2,3,4 and 5 significantly reduces the gap between Strood and Higham leading to contiguous development of the Medway Urban conurbation to the western boundary of Higham, creating, in addition potential developable gaps to the north and south of the Gravesend Road (A226) between the A289 and the Gads Hill School.
- The Medway green belt assessment ignores alternative green belt sites outside the Medway local plan. Whilst this may be procedurally correct in respect of Medway alone, it cannot be procedurally correct in the context of Medway's joint proposal to develop Strood West in conjunction with Chapter Farm which lays within Gravesham Borough council local plan area. Given the cross boarder nature of the proposal and the importance of the green belt in this sensitive location it is vital that a wider assessment across the Medway and Gravesham borders is made in order to be assess other sites in the green belt for their compliance with grey belt criteria and the sustainability of their location. For example, are other site within the green belt in Higham parish also grey belt and are they more sustainably located i.e. adjacent to existing public transport hubs? Refer to NPPF para 110 and 115
- Currently the evidence submitted does not give adequate information to form a view on this key question "which is the most sustainable grey belt site west of Strood able to provide upto 4,000 new homes"

Grey Belt definition PPG 27 February 2025

Medway have attempted to use the green belt assessment as a filter by which they define and allocate grey belt land for development. the points made above bring into doubt the assessment process on a plot by plot basis. However, on further examination there are other areas where the process used becomes problematic. The overall scope of the guidance on assessing grey belt gives clarity as to the nature of grey belt land in respect of the 5 purposes of green belt, guidance on if the release of grey belt land would fundamentally undermine the purposes of green belt, guidance on identifying sustainable locations within green belt land. With respect to land west of strood the two key assessment criteria are as follows

- A) to check the unrestricted sprawl of large built up areas
- B) To prevent the merging of towns

Both of these assessment criteria exclude villages from the assessment process. The Government reasoning behind this is that the expansion and merging of villages within grey belt is acceptable when provision of much needed housing is achieved. However, the PPG leaves open to interpretation what is the position if the expansion of towns incorporates existing villages in the green belt. Our view on this point is that where the expansion of existing towns leads to contiguous development from town to village then the village becomes part of the town via the process of sprawl i.e. as in the historic examples of the village of

Borstal becoming part Rochester and then part of the Medway conurbation. Other examples such as Rainham and Frindsbury Hill also serve to make the point. The key point we are making here is that as villages are incorporated into towns they become an integral part of the town of which they now form a constituent part.

Taking each of the key assessment criteria in turn.

- A) defines a strong contribution to the green belt as site characterised by a site that is adjacent to existing built up areas (Strood), if developed would result in an incongruous pattern of development (such as an extended finger of development into the green belt) refer to attached Image 3. The ppg also states that a site that contributes strongly to the green belt if lack development or features in reasonable proximity which could serve to restrict and contain development. Medway are arguing that the A289 serves this purpose. This is a false premise evidenced in the first place by the development either side of the A2 which feeds into Strood and Rochester, and in the second place by the fact that Higham by sitting on the west side of the A289 creates a number of natural infill plots, which overtime will come under pressure for development, as did plots 2 3 and 4 in the green belt assesment.
- B) to prevent the merging of towns. By incorporating Higham within the contiguous development of Medway urban conurbation the smallest gap in the metropolitan green belt is reduced by approximately 45% significantly altering the character an openness of the green belt at this critical point in the metropolitan green belt.

It is therefore our position that the current local plan regulation 19 allocation for development west of strood is

- Not grey belt
- Does not conform with national green belt policy or grey belt guidance
- Fundamentally undermines the purposes of green belt for the remaining green belt

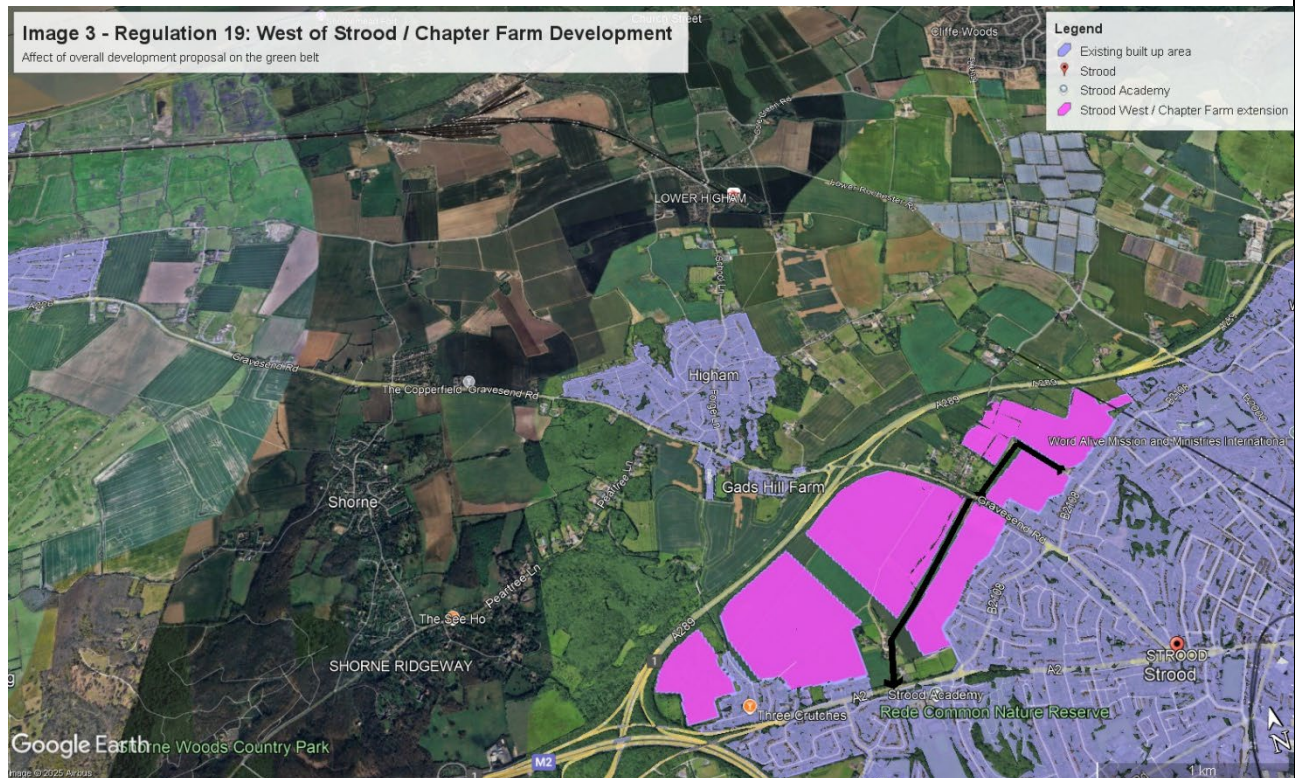
Notwithstanding our position, if the inspector was to disagree with our view and asses that the land west of Strood is grey belt a further level of examination needs to be assessed in terms of its sustainability.

The PPG clearly states that just because land has been identified as grey belt this does not mean that it should be allocated for development. the land under consideration should conform the requirements for appropriate development outlined in NPPF paragraph 155, 110 and 115 which in brief require that land is

- be sustainably located (para 110 115)
- conform to the Golden Rules
- located where genuine choice of transport mode can be offered (Public transport)
- reduce congestion air pollution and improve public health (i.e. active transport combined with public transport)
- all of the above are achievable and viable

it is therefore our position that unless a site can be shown to conform to these principles it should not be allocated for development. It is noted that Medway are proposing a fast track bus system which is currently not a plan commitment or a funded option. In our view utilising the existing public transport system i.e. the railway that links Gravesend, Higham, Strood Rochester and Chatham is a much more viable and sustainable solution. This would require land to be allocated around these stations in order to fully comply with the NPPF guidance on sustainable development.

Image 3: detail of effects of development at west Strood.



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The current allocation of land at strood, lacks evidence, is unsound and unsustainable and undermines the fundamental principles of the green belt between Gravesend and the Medway urban conurbation. Our view is that it should be removed from the local plan and that more sustainable green belt locations for development should be identified centred on the existing public transport system (rail line serving Gravesend, Higham, Strood, Rochester, Chatham)

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.

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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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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="Nicholas"/>	<input type="text"/>
Last Name	<input type="text" value="Dowling"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Architect"/>	<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"/>
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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?

2.2 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4 (3) Complies with the
Duty to co-operate Yes No

Please tick as appropriate

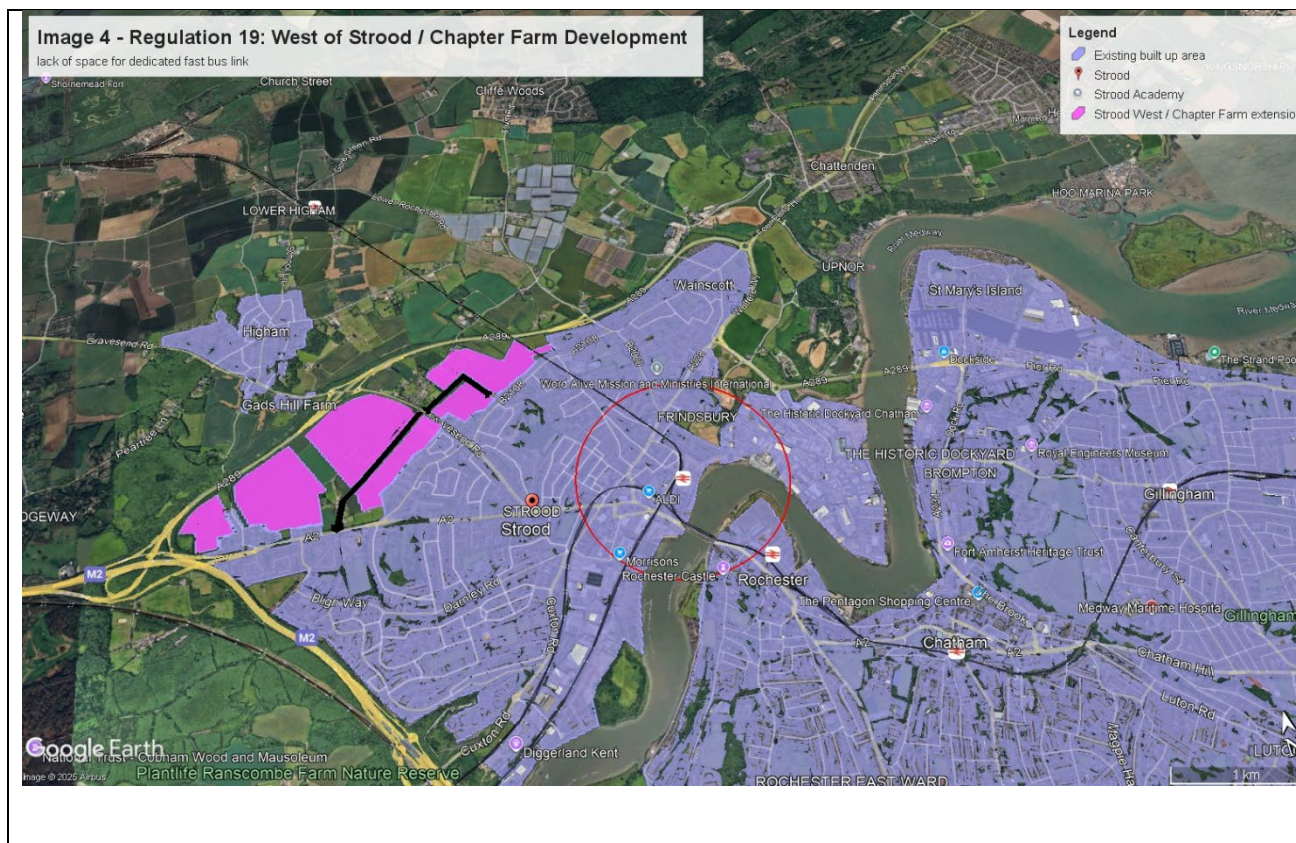
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Refer to our detailed comments on policy S7 and the land west of Strood

- The proposed fast track bus system has no clear route into the centre of Strood and Rochester. The existing pinch points along the A2, A226 and the Rochester Bridge preclude any such solution.
- The proposed fast bus link is not a plan policy commitment and is unfunded
- GBC in their draft regulation 18 and design code are basing their local plan on a 15 minute city approach. The land west of strood and chapter farm combined proposal do not fulfil this policy aspiration, laying as it does outside 800m from the nearest railway station (circle in red on image 4) whilst this is not strictly a Medway matter this point does highlight the lack of shared vision on a key policy component of the Medway Local Plan.

Image 4: Regulation lack of space for dedicated fast track bus route



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Land west of strood should be removed form the local plan and alternative sustainable sites in the green belt adjacent to railway stations be found to provide 4000 homes

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.

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From: [REDACTED]
To: [policy, planning](#)
Subject: Concerns
Date: 11 August 2025 19:32:36

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

Hi,

My concerns are thus;

There is no forward planning to support our already crushed hospital which we all know is much needed. Our medical services are already underfunded, understaffed and out of space. Adding to the population isn't going to ease but compound the issue. Is there a solution for this?

Also there is a statement about easing pressure for Gravesham but there are already many Medway residents that are in great need of social housing. How much of this allocation will be social housing? If there is what will be a priority for Medway residence?

We all know that affordable housing isn't affordable to most Medway local residents, how will this be managed? There has been a significant increase in our area of London landlords buying property to rent out at inflated prices to locals, what will be done to prevent this?

Easing pressure from London and Gravesham boroughs is only crushing the services we already have so what will be done by these councils to help extend our medical and social services? What will be done by our council to ease these burdens?

Kind regards
Lianne Brockwell
Sent from my iPhone

From: [REDACTED]
To: [policy, planning](#)
Subject: Rede Court Housing Proposal
Date: 11 August 2025 20:16:06

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

I would like to express my sincere concern about the proposed Rede Court Housing Development.

Like many other residents, I'm very worried about the lack of reassurance from our councillors that sufficient infrastructure will be put in place. The roads proposed for access are not really wide enough to cope at the moment. Cars are parked badly on the corners of Rede Court Road and it feels like there's an accident waiting to happen.

As a man in his late 70s, who is on the register of Higham Surgery, I am extremely concerned about the threat of its closure. Driving to any of the other surgeries is hardly ideal as my wife and I get older. It is an 8 mile round trip to Cliffe. This situation will only get worse with so many more householders living in the area.

Another major issue is the aviation fuel pipe that runs through the farms. We have always understood that it is too dangerous to build on top of the pipe, or indeed construct a road over it. I am told that the consequences of this could be fatal!

It is also very disappointing that the intention is to change the Green Belt designation to Grey. Strood would indeed become an urban sprawl and Medway would merge with Gravesham, making it a far less desirable place to live.

What a shame that would be.!

Regards
John Connelly

[REDACTED]

Sent from [Outlook for iOS](#)

From: [REDACTED]
To: [policy, planning](#)
Subject: Medway local plan
Date: 11 August 2025 20:16:17

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

Having reviewed the plan I am horrified to see so much construction planned for viable farmland. The destruction of green and farm land is not only a disaster for our fast disappearing rural landscape but also a step towards self sufficiency suicide for the country.

To have land such as that on the Hoo peninsula be obliterated for the profit of construction companies and possibly, the lining of some council pockets, is disgusting. Also the people who live there have no wish to live in urban sprawl!

Not only that the infrastructure there is woefully lacking and the onus to improve it is not on the construction companies but the local taxpayers.

Please take this a strong opposition to this plan

Rob Gilbert

[Sent from the all-new AOL app for iOS](#)

From: [Laura Blair](#)
To: [policy, planning](#)
Subject: Medway Local Plan Regulation 19 consultation response
Date: 11 August 2025 21:21:59

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

To whom it may concern,

I'm writing in response to the Regulation 19 consultation of the recently published Medway Local Plan. While I am broadly supportive of the Local Plan, I have concerns and objections to the decisions and evidence within the plan, particularly relating to Policy SA6 (relating to Strood West), specifically the redesignation of green belt land on north of Watling Street, Rede Court Road and Brompton Farm Road.

This proposal raises serious concerns in terms of the plan's legal compliance, transparency and compliance with national policy:

1. The proposals within the Local Plan and the Green Belt policy review is a major shift from the previous administration's stance and has not been previously proposed or consulted on in any previous stages of the local plan development. This has resulted in a lack of transparency and consultation with local residents, especially given the change in policy relating to the redesignation of green belt land was not publicly flagged until the publication of the local plan.
2. The National Planning Policy Framework (NPPF) makes clear that Green Belt boundaries should only be altered in exceptional circumstances. No such clear or evidenced justification has been provided. The classification of this land as "low quality" ("Grey Belt") is not in line with the suggested policy intent of a definition of 'grey belt'. 'Grey belt' proposals suggested it would be for 'poor quality scrubland, mothballed on the outskirts of town'. The Prime Minister described grey belt land as being 'disused car parks'. This is entirely inconsistent with the land's current use as productive farmland.
3. National planning guidance emphasises a "brownfield-first" approach to protect undeveloped land. This proposal is contrary to these principles, targeting high-quality agricultural land, despite the availability of brownfield options elsewhere in the boundary of Medway Council. In addition, Medway Council's own green belt review says that existing green belt makes up only 4.98% of Medway land. This makes the green belt land we do have even more precious and suggests a high % of brownfield sites which could be alternatively available for development.
4. The infrastructure plan which accompanies the local plan talks on page 15 justifies decisions to row back on development in Hoo and Chattenden due to the need to distinguish between these two places due to different features to ensure distinct identities. However Medway Council are prepared, through the local plan to merge Strood and Gravesend in totally different authorities. This is a total contradiction in

justification.

5. Transparency and Fairness Concerns

- o The Green Belt Review was reportedly subject to independent critique, but the findings have not been made public.
- o There is a lack of published minutes from key meetings between Medway and Gravesham Councils.
- o The prioritisation of Parcels 1–4 (covering Strood North/West) over other less sensitive parcels, such as near Halling, raises questions about fairness and the decision-making process.

6. Medway Council's Green Belt review document argues that development of green belt on the Gravesend side of this parcel renders the Medway green belt ineffective. Green belt land is not a zero sum game. Should Gravesend develop its green belt, this would mean that green belt on the Medway side of the boundary is even more important to provide a buffer, ensure a distinction between Strood and Gravesend which are very different towns with different identities and stop urban sprawl.
7. In addition, the green belt review repeatedly suggests that the development of these parcels of land, together with development of Gravesend green belt, would not result in the merging of Strood and Gravesend. Together these proposals equate to around 4000 new homes which would absolutely lead to the merging of Gravesend and Strood. Currently the green belt land in these proposals acts as the buffer between the two towns.
8. Medway Council have not spent circa £20m of existing Section 106 contributions from previous developments. How can residents have any faith or confidence that the infrastructure improvements promised with this development will be delivered?
9. Throughout the Green Belt review of these parcels Medway Council deploy a weak/moderate/severe categorisation to justify the decision making to designate as 'grey belt'. There is a lack of clarity and transparency over how these classifications are made, what analytical framework sits underneath the definition of 'weak/moderate/severe' and what evidence is deployed to make the assessment.
9. On a personal note as a local resident, the proposed scale of development will significantly worsen existing infrastructure pressures:
- o Transport: Increased traffic congestion, particularly on already busy local roads, with knock-on effects for air quality and journey times.
 - o Healthcare: The Infrastructure Plan recognises there is a shortfall in Dr/Patient ratio (Medway is in the bottom 6% in the country) and that Medway hospital will be insufficient to cope with population increases but the plan provides no concrete plans to rectify this important issue. Current GP services are already

oversubscribed; the development will exacerbate this without clear provision for additional capacity.


- o Education: Local schools are already near capacity, raising concerns about school places for existing and future residents.

10. I have experienced first hand the beauty of this land. It is agricultural, productive land with public footpaths all around. It provides a welcome relief from the busy town, traffic and pollution of Strood. It is a haven for wildlife; birds of prey, rabbits, bats, field mice have all been spotted recently in this land. Large-scale building on this site risks long-term environmental damage, loss of biodiversity, and potential flood risk issues given local topography and climate change impacts.

Kind Regards

Laura

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Please return to Medway Council Planning Service by 11th August 2025

Email: 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="Sean"/>	<input type="text"/>
Last Name	<input type="text" value="Varnham"/>	<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"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: Sean Varnham

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

Paragraph	<input type="text"/>	Policy	SA6: Land West of Strood	Policies Map	SNF1 SNF3 SR5
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4. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

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.

The representations I'd like to make relate to Policy SA6, which is reference to the re-designation of Green Belt Policy SA6 is unsound because it is not justified, not effective, and not consistent with national policy. It also raises concerns over legal compliance and the Duty to Co-operate. As a result, I object to the proposed Local Plan (Policy SA6).

Speculative Planning

The Council has not demonstrated the exceptional circumstances required by NPPF paragraphs 147–151 to justify altering Green Belt boundaries. The principal justification given is that Gravesham Borough Council intends to allocate adjacent land at Chapter Farm. Medway argues that once that land is developed, the adjoining Green Belt "would not be performing the Green Belt function" (SA6 para 14.10.1).

This is circular reasoning: Gravesham's plan is not yet adopted, and its proposals are untested. Medway is pre-emptively using a speculative neighbouring allocation to justify its own release, rather than demonstrating exceptional circumstances through its own plan-making process.

The sequence of events points to a reactive, developer-led decision rather than a robust, plan-led assessment.

Following the loss of £170m Housing Infrastructure Fund support for the Hoo Peninsula, Gravesham formally asked Medway to accommodate up to 2,000 of its unmet homes — a legitimate part of the Duty to Co-operate, but one that directly preceded the Council's sudden pivot to the Green Belt west of Strood. Almost immediately, a development company registered at Persimmon Homes' head office began promoting large tracts of this very land, directly adjoining the Gravesham boundary. Land Registry records (Title number TT93460) confirm ownership by The Orchard Brompton Farm (Strood) Residents Management Company Limited, of Persimmon House, Fulford, York YO19 4FE.

The timing and alignment of these events raise serious questions about whether the site selection process was genuinely objective, or whether the allocation is a reactive, cross-boundary fix shaped by expediency and the commercial interests of a major housebuilder, rather than the outcome of a balanced and evidence-led assessment.

Neglect for the brownfield first approach

The Council has not shown that it has exhausted all reasonable alternatives before turning to the Green Belt. There is no published viability testing of brownfield capacity, no comprehensive urban densification strategy, and no transparent comparative assessment of alternative greenfield sites outside the Green Belt.

Viable alternatives, such as land near Wainscott with superior dual-carriageway access, have been dismissed without clear explanation. This approach is inconsistent with the national "brownfield first" direction set out in the July 2024 ministerial statement by the Deputy Prime Minister, which strengthens the presumption in favour of brownfield development and density uplifts before Green Belt release.

Green Belt Review

The Council's own 2025 Green Belt Review undermines the case for release. It confirms that Parcels 3, 4 and 5 – which form a substantial part of SA6 – are Grade 1 agricultural land and lie within the Dillywood Lane Area of Local Landscape Importance (ALLI). The Review states, for example, in relation to Parcel 3: "This parcel is situated to the south of the A289 within grade 1 agricultural land and the Dillywood Lane Area of Local Landscape Importance (ALLI)."

Parcel 5 is described in identical terms. These are precisely the qualities that Policy BNE34 of the adopted Local Plan, and the 2023 Local Nature Recovery Strategy, commit to protecting. The NPPF (para 180) and Policy BNE48 also require that poorer quality land be used in preference to best and most versatile (BMV) agricultural land. No such sequential preference has been demonstrated here.

Prior Planning Decision

The 2018 refusal of planning permission on part of this land (MC/17/2956) found that development would cause material harm to the landscape character, result in the permanent loss of BMV farmland, and conflict with Green Belt purposes. That decision was recent, detailed, and based on multiple harms — and no new evidence has been presented to justify a complete reversal. On the contrary, the 2025 Review now concedes that “the historic river valley setting of Strood and Rochester could be affected” — a significant new admission of harm absent from the 2018 assessment.

The NPPF’s Purpose B – preventing neighbouring towns from merging – is particularly relevant. The 2025 Review acknowledges that Strood and Gravesend are both “towns/large built-up areas” and that the gap between them is “particularly narrow” in the context of the Metropolitan Green Belt. Allocating SA6 will directly erode this gap, undermining a primary Green Belt purpose. The Review also notes that releasing these parcels could weaken the contribution of adjoining Green Belt in Gravesham.

This is entirely consistent with paragraph 4.12.10 of the Regulation 19 Draft Local Plan itself, which states: “Medway’s Green Belt provides a well-established buffer between settlements, making a significant contribution to the aims and purposes of the Green Belt as set out by the NPPF.” The proposed allocation of SA6 would remove a substantial part of that buffer in one of the most sensitive and narrow locations, directly undermining the Council’s own stated recognition of the Green Belt’s strategic importance.

The Council has sought to downplay this by classifying much of the land as “grey belt” – a term not recognised in national policy. The methodology and scoring behind this classification have not been published, despite it being central to the release justification. Other than the lone Medway Green Belt Review June 2025, which is itself contradictory, there is no separate report that re-classified this land. Who produced it, what was its methodology, and why has it not been made public? The independent critique of the Green Belt Review, referred to in public meetings, has not been made available, nor have full minutes of cross-boundary meetings with Gravesham. This lack of transparency prevents proper public scrutiny and undermines confidence in the process.

Even the policy’s own stated objectives are internally incoherent. SA6 Objective 1 claims the development will “maintain the identity of the rural settlement of Three Crutches”. In reality, building 4,000 homes immediately adjacent to a small rural settlement will absorb and obliterate it, turning it into a suburban cul-de-sac of a vastly expanded Strood. This is not a credible or justified objective.

Water and sewerage

The allocation is also not effective in relation to foul and surface water management. Southern Water's consultation response to the 2018 application on this land confirmed that the existing public sewerage network cannot accommodate the additional flows without increasing the risk of flooding in and around the existing area, contrary to national policy.

The Environment Agency and the Council's own records identify that the site's clay soils make infiltration drainage unlikely to be feasible, meaning greater reliance on an already-pressured sewerage network. No funded, deliverable strategy is identified in the plan to resolve these constraints. Without such a strategy, development on this site risks causing flooding to existing properties, including my own, and environmental harm, contrary to NPPF paragraphs 159–169 and the plan's own environmental objectives.

From personal experience, my property on Brompton Farm Road floods during heavy storms because the sewerage system cannot cope with current flows. The Council has attended to this matter, but due to the sloping nature of the land the drains are consistently overburdened, and there has been no attempt to provide additional drainage infrastructure to cope with even existing demand.

Ecological and public amenity value

These parcels also possess ecological and public amenity value that the Council has chosen to downplay. The land has long been used informally by the local community for recreation and as a green space, and it supports a range of wildlife including red kites, hedgehogs, bats, shrews, and several mouse species. Although the landowner has blocked access from Strodes Close, this does not erase its historic use or its ecological importance. A public access route still runs through the site and is used daily by the local community, many of whom I know use the site for relaxation and management of their own mental health.

In this context, the Council's portrayal of the land as "low quality" or "grey belt" is factually misleading and fails to reflect its real environmental and community value.

The proposed allocation is already having a damaging effect on the rural economy and community life. Little Hermitage, a long-established countryside wedding and events venue located near the SA6 parcels, has recently been put up for sale by its owners, who have cited the proposed development as a key reason for their decision. This venue has historically contributed to the local economy through hospitality, employment, and by attracting visitors to the area, all of which depend on the quality and distinctiveness of its rural setting.

The fact that a viable rural business is being marketed for sale due to the threat of large-scale urbanisation demonstrates the inconsistency between

the plan's stated objectives of supporting rural economies and protecting distinctive landscapes, and the reality of its impact on this location.

Pollution

The Council's own evidence also highlights serious air quality concerns that the SA6 allocation would exacerbate. The Sustainability Appraisal (2023) confirms that the annual average objective for NO₂ has already been exceeded within adjoining road transport areas, including the A2 Air Quality Management Area (AQMA). Locating hundreds or thousands of new homes between the A2 AQMA and Strood will inevitably worsen this position.

The Local Plan & Strategy Review (page 41) acknowledges "there is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development." It also endorses the Local Plan 2003 aim of protecting attractive countryside and maintaining a viable rural economy — aims that are directly contradicted by removing the last remaining Green Belt west of Strood, which currently acts as a buffer to pollution from the A2, M2, and A289.

The LPSR fails to consider the cumulative air quality impact of both Medway's and Gravesham's proposed developments, and the loss of arable land here will remove a natural buffer that helps to absorb pollutants. This is inconsistent with the Council's own Air Quality Action Plan, which identifies the A289 as a high-pollution corridor and Medway as the most polluted area in Kent.

Infrastructure & Public Services

Even if the principle of release were accepted, the allocation is not effective because the infrastructure it depends on is not secured. SA6 promises two new primary schools, a secondary school, sports facilities, a mobility hub, and significant road improvements, but there is no identified, committed funding source. The reference to "exploration of Fast Track" bus services is aspirational rather than a deliverable plan. The Transport Assessment has not robustly modelled the severe cumulative impacts of the Lower Thames Crossing, despite the A226 being identified as a primary diversion route during construction. Local residents already experience severe congestion when there are incidents on the M2; the plan does not explain how the network will cope with the prolonged and predictable disruption from LTC works.

The plan also fails to address the impact on health infrastructure. The recent closure of the GP surgery in Higham has reduced primary care capacity in the immediate area, forcing residents to travel further, often to already congested surgeries, for basic healthcare. NHS Medway Hospital, which serves the wider North Kent population, is already under significant pressure, with long waiting times and capacity constraints. Furthermore, page 265 of the Regulation 19 Draft Local Plan (Policies Map ID SNF20)

earmarks the Medical Centre north of Gun Lane, Strood — one of the town's key medical practices and a late-night pharmacy — for redevelopment of circa 15 homes.

Without adequate replacement provision, this would remove another vital healthcare facility from Strood at the same time as the SA6 allocation and Gravesham's Chapter Farm proposal are set to add thousands of new residents. Introducing this scale of growth while simultaneously reducing local GP and pharmacy provision, and without secured, funded expansion of health services, will exacerbate existing problems and reduce service quality for both new and existing patients.

Nor has the plan accounted for the combined effects of this allocation and Gravesham's proposals on local roads, schools, health services, and other infrastructure. By progressing ahead of Gravesham's plan, Medway prevents the Inspector from assessing the true combined impact — making the decision in an evidence vacuum and failing the "positively prepared" test.

Summary

In summary, SA6 conflicts with the Council's own adopted and emerging policies, its recent planning decisions, and the evidence in its 2025 Green Belt Review. It fails to demonstrate exceptional circumstances, ignores reasonable alternatives, undermines key Green Belt purposes, risks flooding existing properties, worsens air quality, damages the rural economy, and relies on undeliverable infrastructure. The process has lacked transparency, and the decision is premature in the context of unresolved cross-boundary impacts.

(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.

To make the Local Plan legally compliant, sound, and consistent with national policy, Policy SA6 should be deleted in its entirety and the land retained within the Metropolitan Green Belt. The Council should only consider Green Belt release if it can first demonstrate, through a transparent and robust process, that exceptional circumstances exist in accordance with NPPF paragraphs 147–151, and that all reasonable alternatives have been fully assessed and exhausted.

The following specific modifications are required:

1. Re-test Housing Distribution and Apply “Brownfield First”

Undertake a full brownfield capacity review, supported by up-to-date viability testing, and an urban densification strategy to optimise development within existing settlements. Publish and consult on this before any Green Belt release is proposed, in line with the July 2024 ministerial statement and NPPF paragraph 148. This must include transparent reasons for rejecting or accepting each alternative site, including those outside the Green Belt.

2. Transparent Comparative Site Assessment

Publish a clear, evidence-based comparison of all reasonable alternative sites, including Wainscott and other non-Green Belt options, explaining why each is accepted or rejected. Apply a sequential preference for poorer quality agricultural land over best and most versatile (BMV) land, as required by NPPF paragraph 180 and Policy BNE48.

3. Full Disclosure of Green Belt Evidence

Publish the complete methodology, scoring, and rationale for the “grey belt” classification, including the report that re-classified the land, the identity of its authors, and the methodology used. Release the independent critique of the 2025 Green Belt Review and all Duty to Co-operate meeting records with Gravesham, including minutes, agendas, and correspondence.

4. Re-evaluate in Light of Council’s Own Evidence and Policies

Explain, with evidence, why the Council’s own 2025 Green Belt Review statements — that Parcels 3 and 5 are Grade 1 agricultural land within the Dillywood Lane ALLI — and the 2018 refusal decision (MC/17/2956) no longer apply. Demonstrate how removing this land from the Green Belt is consistent with paragraph 4.12.10 of the Regulation 19 Draft Local Plan, which recognises the Green Belt as a “well-established buffer” making a “significant contribution” to NPPF purposes. If no substantive change in circumstances can be demonstrated, the allocation should be removed.

5. Address Policy Objective Incoherence

Amend or remove SA6 Objective 1 (“maintain the identity of the rural settlement of Three Crutches”) unless it can be evidenced how a 4,000-home development will achieve this without absorbing the settlement into the urban area.

6. Historic Setting Impact Assessment

Provide a robust Heritage Impact Assessment addressing the 2025 GBR’s admission that the historic river valley setting of Strood and Rochester could be harmed, with mitigation or removal of the allocation if harm cannot be mitigated.

7. Drainage and Flood Risk Strategy

Require, as a pre-condition of allocation, a detailed foul and surface water drainage strategy agreed with Southern Water and the Environment Agency, demonstrating that the development will not increase flood risk on- or off-site. Include committed funding for any necessary sewer network upgrades and binding phasing so that no dwellings are occupied until the required works are complete.

8. Protect and Enhance Ecological and Public Amenity Value

Undertake an up-to-date ecological survey of the SA6 parcels, recognising their role as informal public open space and habitat for species including red kites, hedgehogs, bats, shrews, and mice. Incorporate measures to retain and enhance biodiversity and maintain public access routes where possible.

9. Safeguard Rural Economy Assets

Recognise and protect the contribution of rural businesses such as Little Hermitage to the local economy and community. Avoid allocations that would undermine their viability through loss of rural setting or increased urbanisation.

10. Air Quality Mitigation and Cumulative Impact Assessment

Undertake a full cumulative air quality assessment covering both Medway's and Gravesham's proposed developments, in line with the Council's Air Quality Action Plan. Identify mitigation measures to ensure compliance with NO₂ objectives in the A2 AQMA and to retain significant green buffers that help absorb pollutants.

11. Health Infrastructure Safeguards

Before allocating SA6, secure and fund the expansion of local primary care and hospital capacity to meet the needs of the increased population. This must include:

- Enhanced replacement provision for the now closed Higham GP surgery.
- Replacement or retention of the Medical Centre north of Gun Lane, Strood (Policies Map ID SNF20), if redevelopment proceeds, to avoid loss of one of Strood's key medical practices and late-night pharmacies.
- A clear plan for relieving existing pressure on NHS Medway Hospital.

12. Infrastructure Delivery Plan with Binding Triggers

Produce a detailed, costed, and fully funded Infrastructure Delivery Plan for SA6, including identified funding sources for all schools, transport, health, and community facilities. Link housing occupations to the

completion of infrastructure and include robust modelling of cumulative transport impacts with Gravesham's plan and the Lower Thames Crossing.

13. Re-programme Plan-making to Avoid Prematurity

Align the timetable for any cross-boundary allocation with Gravesham's Local Plan so that the full cumulative impacts can be assessed at examination. This will ensure the plan is positively prepared and based on a complete evidence base.

If these modifications are not made, the allocation of SA6 should be deleted entirely.

(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:

I wish to participate in the hearing sessions because Policy SA6 raises complex and interlinked issues that go to the heart of the plan's soundness, legal compliance, and compliance with the Duty to Co-operate. My representation draws on detailed analysis of the Council's own evidence base, including the 2025 Green Belt Review, the Regulation 19 Draft Local Plan, the Local Plan & Strategy Review, and the 2018 MC/17/2956 refusal, as well as first-hand local knowledge of the site and its surroundings.

I can provide the Inspector with specific, factual evidence on matters such as:

- The ecological, public amenity, and rural economic value of the land etc.
- Localised flooding and drainage issues, supported by personal experience of repeated sewer and storm drain flooding on Brompton Farm Road.

These are matters that require examination to test the Council's evidence and to ensure the Inspector has a complete understanding of the real-world impacts and the cross-boundary context. My participation will help ensure that the examination fully explores whether SA6 is justified, effective, and consistent with national policy.

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](#)
Cc: [Robert Gollay Gollay](#)
Subject: Medway Plan Consultaion
Date: 12 August 2025 01:52:44

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Medway Plan

We are appalled that Medway Council is considering concreting over the entire Capstone Valley for future housing development.

As local residents, we have fought this notion for the past 40 years giving all the reasons why we should be conserving our farmland for the nations food; caring for the wildlife habitats & biodiversity of this unique rural area; not to mention the prevention of coalescence of neighbourhoods & maintenance of a place of peace & harmony for the wellbeing of Medway's residents with its current beautiful vistas across to the Kent North Downs. The Capstone Valley is currently designated as a place of rural importance, providing access to the Kent North Downs Area of Outstanding Beauty and its other Special Areas of Scientific Value.

No thought has been given to the provision of the infrastructure in this area including water & drainage in a valley already susceptible to severe flooding; roads, where country lanes & tracks currently exist; education & health, both of which are currently struggling with the recent influx of people from London.

The roads are far too narrow in the area to accommodate any additional traffic attempting to access the Motorway system or wishing to drive through the Medway towns, on narrow Victorian roads with traditional on-street housing, to access the railway stations. The current traffic flows are already at a standstill, especially at peak times, and the buses are very unreliable, which further encourages car usage. The valley will become heavily polluted in terms of aggravated light, noise & air pollution, which will be the death-knell to the current abundance of wildlife: bats; owls; geese; a variety of birds & pollinators; hedgehogs; foxes; flora.

This is an ill-thought out plan and in our opinion is not compliant & sound. Medway Planning should be ashamed of itself, as should the government for forcing this type of development onto local councils.

Mr & Mrs RM Gollay

[REDACTED]

Sent from my iPhone

Ms L Wilson



11 August 2025

MEDWAY LOCAL PLAN – OBJECTION TO GREEN BELT AND POLICY SA6 (STROOD WEST)

I would appreciate your help with raising my objections so as they are included to the Medway plans, having attended a meeting at St Francis Church, Galahad Avenue, Strood on Thursday 7th August.

I completely understand the need for housing and Medway needs to be part of our country's solution to the housing problem along with the whole of our country.

I would like to object to the following:-

Grey Belt – My understanding of the change from Green to Grey belt refers to land that is no longer suitable for Green Belt designation. Where Grey belt was previously been Industrial sites, hard standing or brownfield, making it suitable for development. Whereas the areas in Strood West (to the rear of Brompton Farm Road and Carisbrooke Road) is still used for farming which has been the case for several hundreds of years. Just a few weeks ago the corn was being collected.

At the moment climate change is affecting the whole world, in no small part for Medway has a rising air pollution and long term environmental damage. We will never be able to go back. We are told we can make a difference, to increase our area by ultimately by 20% of the current population is detrimental to our health and future generations.

We should be looking at the produce we will need to grow and share within the UK. It may become difficult to have economic trade deals with countries around the world in financial terms, therefore it is imperative that Kent does remain the Garden of England for food as it has throughout history.

Wild life disturbance – I regularly see bats in the evening, swooping over the rear of my property. Quite recently I have listened to the dawn chorus from Goldfinch, Robin, Chiffchaff, Wren, Blackbird and Woodpigeon to name but a few (recorded on the Merlin app). This supports our balance with nature, this happens because of our current landscape. Where will they go if the land is replaced by a concrete jungle?

We at present have a pipeline, containing Exolum aviation fuel running at various distances varying from beneath resident's gardens or running directly in the field behind our gardens. I dread to think of the devastation which could be caused. Residents are told they are not permitted to grow trees or land a base for a garden shed etc. How can this be managed with 6 ton Lorries travelling over this land?

Health care – again this is a national problem with the health service not coping. In Medway it is different, we have a local surgery closing, an aging population who cannot or do not want to travel to several towns away for appointments is unacceptable. Personally my surgery do their best of a bad position, but I'm not a regular visitor to the surgery. Again the current position is troublesome not being able to make an appointment, how will that improve by building the planned housing estates?

Roads and transport – Our roads are in a poor condition, adding to which when the A2 or the A289 has an accident/issue the B2108 is regularly used to relieve these roads. We suffer from congestion with long queues of cars and Lorries, how will this improve or remain status quo with more hoses?

Education – do we have the capacity to offer school places?

Present residents – I have lived in this area for over 35 years, but in the vicinity my whole life. I chose the area because I felt it was a good place to bring up my family and provide the type of environment which has proved to be conducive for my children and progress successfully in their chosen careers. I now listen to young families (30/40 year olds) trying to do exactly the same; they have borrowed on mortgages as the area at present offers what they want as I did, but now feel let down that they are in a position which is not what they wanted or indeed expected living next to a Green belt area (designate for over 70 years). At one fell swoop our local council have changed.

I would love to see a resolution to our national homelessness problems, this should not be the case in 2025. But let us choose the right places not ruining dreams for current residents across the spectrum, whether they are making a start in a 'forever' family home or have worked their entire life to retire in their 'forever home'.

Thank you for taking time to read my comments and hope you will see the passion my neighbours together with local residents' genuine concerns for our areas.

Yours faithfully

L Wilson

From: [REDACTED]
To: [policy, planning](#)
Subject: Comments on REGULATION 19 CONSULTATION
Date: 11 August 2025 23:07:47

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Dear Medway Planning Policy Team,

I am a resident of Allhallows, and I am writing to express my deep frustration and strong opposition to the Local Plan as it currently stands. Frankly, I believe the plan is flawed, misleading, and does not serve the best interests of our village or its residents.

The plan contains statements that are blatantly misleading, seemingly designed to push the plan through at any cost rather than genuinely benefiting our community. For example, the plan repeatedly highlights the presence of a local school as an asset, but fails to acknowledge that the school is already at full capacity. This omission is not a minor oversight—it's a significant deception that undermines trust and shows a disregard for the real challenges facing Allhallows.

Moreover, the only logical approach to development should be an urban focus—building on land that is no longer in use and repurposing abandoned or disused buildings. Instead, this plan ignores that common-sense strategy and pushes for development on precious green spaces, which goes directly against environmental and climate change laws and initiatives. You will destroy the environment, ruin the countryside, and devastate the majority of our local businesses. The resulting overcrowding will be on a scale that is unimaginable and wholly unacceptable for a village like ours.

As has happened time and again, you will build these unwanted houses, swamp and overcrowd Allhallows, then abandon us. It's baffling how Medway Council finds the time and funds to invest heavily in building houses and other projects that no one in our community wants, needs, or asked for. Yet whenever we reach out for help or support, we are told we're not worth your investment. When are you going to make up your mind?

It feels as though the plan's authors have no real intention to support or protect our village. Instead, it reads like a document created to justify unwanted development without proper regard for infrastructure, local needs, or honest consultation. The duty to cooperate appears to be ignored, and transparency is sorely lacking.

I strongly urge you to reconsider any further development in Allhallows unless you are prepared to listen, be honest, and put the interests of the people first.

I look forward to your response.

Sincerely,
Rachael Selleck

[REDACTED]

[REDACTED], ME3 [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 11th August 2025

Email: planning.policy@medway.gov.uk or post to:

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

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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="Ben"/>	<input type="text"/>
Last Name	<input type="text" value="Barnes-Farnham"/>	<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" 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"/>	<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 checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	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.

The reclassification of Green Belt land behind Brompton Farm Road and its allocation for housing is not legally compliant or sound because:

- * No exceptional circumstances for Green Belt release have been robustly evidenced (NPPF 140–150).
- * Reasonable alternatives on brownfield or less sensitive land have not been fully assessed.
- * Infrastructure capacity (roads, healthcare, schools, drainage) is not demonstrated, making the plan ineffective.
- * Environmental impacts (wildlife habitat, flood risk, open space loss) are inadequately addressed in the Sustainability Appraisal.
- * Consultation on Green Belt changes was insufficient, failing the Statement of Community Involvement.
- * Duty to Cooperate evidence with neighbouring authorities and statutory bodies on cross-boundary impacts is lacking.

(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.

In order to make the plan sound and legally compliant:

- * Remove the Brompton Farm Road site from allocation and keep it as Green Belt.
- * Recalculate housing need using up-to-date evidence.
- * Prioritise brownfield and less sensitive land before Green Belt.
- * Provide a deliverable infrastructure plan (transport, healthcare, schools, drainage).
- * Carry out a full environmental assessment of biodiversity, flood risk, and cumulative impacts.
- * Hold proper consultation on all Green Belt changes in line with the Statement of Community Involvement.
- * Show evidence of Duty to Cooperate with neighbouring authorities and statutory bodies.

For these reasons, the proposed allocation behind Brompton Farm Road should be removed from the plan and the land retained as Green Belt. This would ensure the Local Plan complies with the NPPF, protects valued landscapes and biodiversity, directs development to more suitable sites, and delivers housing in a way that is sustainable, infrastructure-led, and supported by the community.

(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:

I wish to participate in the oral sessions to provide first-hand local knowledge of the Brompton Farm Road area and its surrounding community, and to discuss the environmental, infrastructure, and quality-of-life impacts of the proposed development. Having attended the council's open evenings, I am deeply concerned by the lack of clear responses to legitimate questions and the use of emotive arguments about the plight of deprived children to justify the loss of Green Belt land without robust evidence.

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.

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

From: [REDACTED]
To: [policy, planning](#)
Subject: Representation in Responce to Medway"s Regulation 19 draft Local Plan
Date: 11 August 2025 23:22:11
Attachments: [Representation to Medway Council.pdf](#)

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Dear Local Planning Authority,

I write to you as a long standing resident of Medway currently living in the Frindsbury Extra area. This is a representation in response to Regulation 19 consultation of the Local Plan. Please pass my representation on to the Independant Inspector when the plan is submitted for Examination.

The attached letter describes my main areas of concern with the Plan, specifically:

- Legal Compliance and Soundness
- My objections to the proposed redesignation of the Greenbelt land , West of Strood (policy SA6) and the general extensive use of high grade arable land for housing on the Hoo Peninsula
- The Plan's lack of quantifiable provision for improvement and expansion to essential public services, particular healthcare and hospital capacity.
- The unsustainable burden that the proposed development plans will place of the local road infrastructure and the lack of provision for improvement to the already unacceptable safety and congestion in the area.

Kind Regards

Richard Bellingham

[REDACTED]
[REDACTED]
[REDACTED]

11th August 2025

Representation in response to Medway Council's Regulation 19 draft Local Plan

To Local Planning Authority,

I am writing as a local resident of Frindsbury Extra and also somebody with long standing family interests with Rede Court Road, adjacent to the greenbelt land discussed in Policy SA6.

The following is a supplement to the general objections that I have raised to the contents of the wider Local Plan and specifically to the proposal to build 1280 houses on current greenbelt land, west of Strood (ref Policy SA6).

Compliance and Soundness:

I believe the overall 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 & 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 (Dec2024). 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 (Sept 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 and Habitats Regulations Assessment. The Sustainability Appraisal fails to legally satisfy 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.

Environmental:

The proposed redesignation of Green belt land to Grey belt as detailed in Policy SA6 to permit new developments of 1280 houses will irreversibly destroy the landscape, character and environmental quality of the area.

The extensive loss of high quality arable farmland to housing on the Hoo Peninsula will have similar negative consequences to the environment.

Taken in combination, the draft Local Plan will have an irreversible and devastating impact on all aspects of the local environment.

- In terms of compliance and soundness the review of Greenbelt designated land has not been clearly flagged and adequate consultation did not take place with the public before making taking the decision to redesignate as “Grey Belt”.
- According to NPPF, changes to Greenbelt boundaries should only happen in exceptional circumstances. However, no justification for these exceptional circumstances has been given.
- Grey belt is not a formal planning designation, but rather a term used to describe land that might be more suitable for development within the Green Belt. The definitions of Grey Belt land do not accurately describe the majority of the space within the land detailed in Policy SA6. The vast majority of the land within the current Greenbelt protection is high grade arable land currently and actively used for food production. Medway Council have however described the land as “low quality” in order to push through the re-designation although this is clearly not the case and is an abuse of the scope of the definitions.
- There is a general concern over the transparency of actions leading to the boundary change decisions.
 - The Green Belt Review was apparently critiqued by independent consultants but this study has not been made public.
 - Various meetings between Medway and Gravesham Councils have no published minutes.
 - It is curious why the Medway draft Plan has published but Gravesham’s Plan is not similarly progressed. Without visibility of the two plans how can the cross-border justifications be sound?
- The addition of over proposed 4000 houses in this locality alone and resulting population and vehicles will create additional air, noise and light pollution. It will also have a negative impact on the effects of climate change which will be contrary to one of the objectives that the Plan is claiming to avoid.
- Prime arable farmland will be lost at a time when world events and instability should be encouraging greater self-sufficiency on UK food production, not reducing its capacity by destroying farming land.
- There will be the inevitable loss of our valued countryside and impact to wildlife.

- The development will mean the loss of open and safe space currently used extensively and enjoyed by existing residents for exercise and general wellbeing.
- The impact of the proposed loss of greenbelt to extensive housing and adjacent developments will be to further erode the character of the surrounding communities and will only serve to have a negative impact on the quality of life for many existing long-term residents of the area.
- The plan takes no account of the new Lower Thames Crossing which will be only a short distance away from the proposed Greenbelt reclassification. Such spaces are essential in the wider ecology of the area to offset the damaging pollutants that will inevitably occur. The Local Plan therefore is remiss in taking into account other major developments that could have an effect on the wider environment.

Road Safety and Traffic Management:

The potentially massive development of houses across the land north of Rede Court Road and Brompton Farm Road continuing onto the whole of the Hoo Peninsula will inevitably introduce thousands of additional vehicles to a local road network that is already beyond its safe and practical capacity.

- The stretch of A2 between the M2 and Cobham is usually at a standstill at peak times and frequently further delayed by accidents.
- The A289 bypass is already regularly beyond capacity with queued traffic from Four Elms back to and beyond the B2000 exit or traffic trying to join the A2. Significant additional traffic will further add to driving hazards and delay.
- Brompton Farm Road and Rede Court Road will become even more congested as it will be used as a “rabbit run” by traffic accessing new developments and trying to beat queues on the main roads. The plan proposes access to the proposed housing development detailed in Policy SA6 from the A2, Gravesend Road and Brompton Farm Road. These roads cannot sustain the proposed additional burden of traffic.
- The surrounding road infrastructure is already over stressed. The main access roads towards Strood town centre from Brompton Farm Road and Rede Court Road are already over stretched and dangerous creating delay to and from existing residential side roads in the vicinity. Many of the roads (e.g. Cooling Road and Cliffe Road) are already bottlenecked to single file in places due to the volume of parked cars causing delays and serious hazard to all road users.
- Serious accidents occur in the local area already. The increased traffic will only lead to greater frequency and potentially seriousness of these occurrences. For example, accidents are notably commonplace on the stretch of the B2000 between Brompton Farm Road and the A289 bypass junctions as volume is

traffic has significantly increased already with recent developments in the villages of Cliffe Woods and beyond.

- There appear to be no new schemes for better routing to Strood town or railway station as doubtless a significant proportion of new residents would need this access.

Local Services:

The extent of proposed developments would likely create a population of several thousand residents from outside of the existing Medway catchment (At a local public meeting recently held after the publication of the draft Local Plan I specifically asked a member of the Medway Council Planning team who he thought would purchase the majority of the houses – I was informed most would be bought by people moving in from London suburbs) yet it seems there is no specific provision in the Local Plan for improvement of key services.

- The GP and dental system in the area is already broken. Existing residents have extreme difficulty in obtaining timely GP appointments and access to other key NHS services. Additional development will only make the problem worse especially given current news of the imminent closure of at least one local GP surgery.
- Medway Hospital is already stretched well beyond its design capacity. There are no specific plans for improving the hospital capacity of Medway. Medway Hospital currently has a capacity of 651 beds for a catchment of 470,000 people (ref Medway Hospital website). With anticipated increase to Medway population of 75 – 100, 000 people during the Plan period but absolutely no visibility of specific improved hospital resources then at some point the infrastructure will collapse. Already according Care Quality Commission reports, Medway Hospital's overall rating is listed as "requires improvements".

Conclusion:

It is of profound concern to me that the wider Medway Local Plan essentially sets out to meet an arbitrary housing target by any means it can without any substantive means of identifying how the local infrastructure can sustain the increased strains that it will be placed under. Moreover, there seems to be a singular lack of regard for the impact and irreversible damage the Plan will have on the environment and the well being of the Town's existing population.

Whilst the concept of a well-considered Local Plan should be welcomed, the area of focus should be on the sustainability and quality of life for the existing population and communities and to help preserve and character of our surroundings as a place of choice in which to live.

11th August 2025

Medway Local Plan Consultation 2025 -2041

Dear Sir/ Madam

Representation to Local Plan Consultation

I am writing to respond to the Medway Local Plan Regulation 19 Consultation, following significant representations made to Medway Council in relation to many aspects of the local plan over a number of years as the former Member of Parliament for Rochester & Strood constituency.

It is disappointed yet again by the Council's lack of vision in the Medway Local Plan 2041 document and it has resurfaced past frustrations with the failure to think strategically about the future of Medway and how the towns will look in 2041. There are no proposals on how to make the most of what we have, this is exhibited by the failure to demonstrate how Medway can produce high-quality jobs with the necessary employment land. Nor are there ideas for how the Council plan to deal with the increase in population and the delivery of required services, such as hospital needs or a plan for social care.

The Council are proposing significant changes to the make up of the towns with the housing target and they must realise this means a much more detailed plan is required to provide information for residents what life in Medway will be like in 2041.

Hoo Peninsula

After the failed HIF project, it is disappointing the Council have not learnt the lessons of that episode, the independent decision makers were unable to accept the plans, due to the deliverability and cost, however without a proper plan that is deliverable, it is still unclear how this scale of housing can be delivered sustainably. The vast majority of sites that have been put forward for potential development are on the Hoo Peninsula.

I have long made clear to the Council that this area is not suitable for the type of development they are proposing so I would like greater clarity from the Council on what they are proposing for the Hoo Peninsula. The joining up of distinct villages is totally out of character to the area. It is not fair to propose such a significant proportion of the area's housing target in one area of one constituency of the three that serve Medway.

The fact that this is still the case in the aftermath of the HIF funding loss is a surprise. The loss of HIF funding showed the Council were unable to manage large-scale projects to deliver the necessary infrastructure improvements for the Hoo Peninsula. Therefore, it is unclear how they propose to accommodate this level of housing with no plan for the future of infrastructure in the area, which are already struggling.

Constant threats of "large scale development around Hoo St Werburgh and neighbouring villages", are an unwise approach from the Council. It remains a frustration that the Council are continuing this approach to the Hoo Peninsula of imposing development on residents instead of working with the local community in order to come up with a plan that would be welcomed by existing residents.

These areas are not suitable for large scale development as has been the case for many years and is often made clear to developers. This area is surrounded by Ramsar sites, Sites of Special Scientific Interest (SSSIs) and is important for migrating birds. I urge the Council to rethink their proposals for the Hoo Peninsula due to the unique and special characteristics that we are lucky to have and they are keen to destroy.

Chatham Docks and Employment land

The Council have regrettably continued their policy of proposing Chatham Docks as land for development instead of designating it as employment land.

Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. The Council have stated that these large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.

The matter of Chatham Docks has been discussed at length and Chatham Docks has significant local support, there is an alternative plan for Chatham Docks, which would see the development of increased economic activity and make better use of what is a significantly important regional infrastructure site. The loss of such important economic site for short term gain contradicts what the consultation document outlines as a vision. The inclusion of Chatham docks was an issue which contributed to the downfall of previous iterations of the Local Plan process.

Medway City industrial Estate has been a success story in the Medway towns and has contributed to economic development of the area. I am concerned that whilst this is being considered for housing development, we are not recognising the current needs that exist already in the towns which is the lack of commercial sites for a range of businesses whom are looking to expand and grow.

Housing targets

The pressure on Medway Council to deliver housing in these sites are the result of the housing targets mentioned at the start of my response.

I believe these targets put Medway, particularly Rochester and Strood under enormous pressure to deliver inappropriate numbers of housing in the wrong areas that do not enjoy the support of the local community who are having this top-down development enforced upon them.

As I have mentioned previously, Medway Residents are also forced to compete with the wages of those moving from London to live in Medway. Housing associations are buying new builds and actively seeking properties on the open market. This has been pushing up prices and having a significant impact on the local market and the ability for local people to buy. This all puts further pressure on Medway's ability to deliver a cogent Local Plan and ensure the future prosperity of the Towns.

It is therefore clear that Medway's housing targets are having a disproportionate impact on the area. This is no way for housebuilding in this country to take place and the result is inadequate plans and inappropriate sites for housing development.

Conclusion

The draft Local Plan is unfortunately a disappointing document. They have simply not put the necessary thought to up with a sufficient strategic view for the future of the towns. They have returned to similar sites that have previously been put forward and widely rejected by the local community and unable to achieve political support from councillors, it is staggering they are proposing sites they have already rejected, such as Chatham Docks. The Plan remains committed to providing large scale housing in totally inappropriate parts of the Medway Towns.

Yours Sincerely

Rt Hon Kelly Tolhurst

From: [Martin Potter](#)
To: [policy, planning](#)
Subject: Local Plan (2041) Consultation Response- Mr Martin Potter
Date: 11 August 2025 23:58:52

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I am concerned with the legality and sounds of the draft Local Plan.

Thus submission is in addition to my submission as part of the community response to Policy SA10.

Development Proposals

It's concerning to see that all the draft Local Plan is focused on development in already densely built up and overstretched suburban areas of East Rainham and West Strood. However, it's especially worrying to see significant development for the North of Rainham, including the Lower Rainham and Twydall orchards and farmland (Pump Lane Orchards), and the Capstone Valley.

Furthermore, Gillingham and Rainham is the most densely populated constituency in the South East (outside London), and all the draft Plan proposed would further burden the highly congested highways in Rainham and beyond. Our local services are already overstretched, and all the proposed options in the plan would lead to a further loss of our precious remaining green spaces and countryside, including the very best and most versatile agricultural land.

The proposed options do not respect the rural character of Medway, and the associated rural heritage, something which is indivisible from the character of these rural areas.

Key Issues

Greater consideration of the quality of life for all residents, both for those already living in the area and for potential new residents. It is obvious that the strategy for Medway should not be to further burden already overstretched suburban areas, these areas already have traffic clogged highways and local services at or over capacity. There is great potential for urban regeneration in Chatham, Strood and Gillingham, and this should be focus for new the majority of new homes.

Wider Comments on Plan

The local plan should go back the drawing board with a plan that is more focused on, and more ambitious for, urban regeneration in Chatham, Gillingham and Strood. If the majority of housing need cannot be met through this option, then the Council must challenge the government on its housing targets for Medway. It is unacceptable and unsustainable to burden local residents with further significant urban and greenfield development in Medway.

Comments for the Regulation 19 New Local Plan for Medway

The main concern I have is for the natural environment and wildlife populations of Medway and the impact that housing and other developments may have on them. Green areas have been approved for development such as Gibraltar Farm and Lidsing and indeed East Hill is currently undergoing development destroying much in the way of green areas. At Junction 4 of the M2 a new spur road is planned which will obliterate farm land in Bredhurst which comprises the Kent Downs, Capstone Valley and the AONB and areas of SSI and altering the rural character of these areas.

It has, furthermore, been advocated that more of the farmland comprising and surrounding the Capstone Valley be developed such as farm land that surrounds Star Lane and areas to the West of Strood, Lower Rainham, which has already seen several large housing estates cover farm land in this area. The Hoo Peninsula is similarly earmarked for development. Both Rainham and Hoo are home to water fowl and other birds and are deemed Ramsar Sites.

Given that these developments have or will destroy farmland, green spaces and have or will affect the wildlife population such as bats, badgers, foxes, rabbits, newts, snakes and ground nesting birds such as sky-larks who are present in Hempstead and Bredhurst on land earmarked for the development of a business park comprising warehouses, a GP surgery, a school and shops of various kinds, the Medway Local Plan should help to ensure that as little green field/belt land is used for development as possible, using brownfield sites and tackling derelict and empty properties which would negate the need for such an extensive building programme proposed by the Government.

The above mentioned animals are affected by air, light and noise pollution as well as loss of habitat due to building projects and we, as the dominant species, have a duty to ensure that animal populations are protected throughout the Medway area - we do not own the land, rather, we are custodians and are therefore duty bound to take care of it for both human and animal populations for now and for the future.

Both human and animal populations need green spaces and clean air and shrubs, trees and green trees to help to facilitate this. Carbon dioxide is absorbed by trees and shrubs and research has demonstrated that immersing oneself in nature/green spaces helps to improve mental health. Medway's Local Plan should reflect these needs and the vast majority of green spaces should be protected from development.

There are many images in the local plan that show some green lung areas of Medway covered in white concrete blocks surrounding the grassy area at Chatham Riverside. While this may look modern and 'go-ahead', that space is the one green area in centre of Chatham that is very important for all to use. Please do not cover green areas in such blocks(throughout Medway) and maintain the character and natural history of each area.

Similarly, the construction of houses should remain in keeping with the character of the surrounding area and not disturb or destroy the rural or even the urban character of a place.

We need to be able to grow our own food within the Medway Towns and the recent Pandemic has demonstrated that we need to be self sufficient when necessary. We, therefore, need to look after our farm land and in addition our pollinators such as bees, wasps etc. Natural and organic farming practices and the preservation of our farms across the Meway Towns would provide the plant material, flowers and blossom in order to allow our pollenators to thrive.

Medway has very little to offer in the way of music, culture or the arts so music venues and theatres should be high upon the list of things to be built - several pubs that were formerly thriving music venues were allowed to close under the Council leaving the towns void of much needed places to go to for entertainment.

Much has been said about pollution throughout Medway as well as traffic congestion and it has been stated that the new local plan will encourage more walking and cycling but not everyone will work in the Towns or be able to walk or cycle distances and most will not have the time to do so. I would suggest that Medway adopt a subsidized public transport system that would facilitate travel throughout Medway and beyond that is operational on a frequent and regular basis - maybe even 24 hours a day. Buses could have racks fitted to the outside of the vehicle, as they do in San Francisco, to carry bikes.

The new local plan for Medway should adopt a strategy of maintaing and/or creating strategic gaps between areas otherwise it will create an uncomfortable and distasteful feel of urban sprawl where Medway will just merge with the surrounding areas and this will extend, in the not too distant future, to London with no gaps and the NPPF observes this.

The local plan should reflect and discourage people from paving over their drive ways to facilitate parking and their gardens in order to build patios as again this affects the water table as well as the wildlife.

In summary, keep Medway's green spaces natural and stop developing green land and protect what will be left of the Capstone Valley. Instead, make good use of empty properties and derelict properties and build on brownfield sites only.