

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Mr	
First Name	Jonathan	
Last Name	Arthur	
Job Title	Director of Estates & Preservation	
(where relevant)		
Organisation	Chatham Historic Dockyard Trust	
(where relevant)		
Address Line 1	First Floor, Fitted Rigging House	
Line 2	The Historic Dockyard	
Line 3	Chatham	
Line 4	Kent	
Post Code	ME4 4TZ	
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	14.3.2 Page 254	Policy	SA2: Heritage- led Sites	Policies Map	CCB25
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Chatham Historic Dockyard Trust (CHDT) welcomes the opportunity to respond to **Medway Council's Regulation 19 consultation on the draft Local Plan. As a major landowner and long-standing stakeholder in Chatham's regeneration, we recognise** the considerable progress that has been made by the Council and commend the Planning Policy team for their work in preparing the draft Local Plan for submission.

The Trust is a registered charity with a core purpose of preserving and enhancing the heritage of the Historic Dockyard Chatham, while promoting sustainable regeneration through education, tourism, and enterprise. We have a demonstrable track record of **investment, stewardship, and partnership in support of Medway's** economic and cultural development.

Representation on Land Use Allocation – Riverside Site, Interface Land (South of Leviathan Way)

The Interface Land is part of the designated Chatham Historic Dockyard Conservation Area. It contains two largely undeveloped sites, the Brunel and Riverside Sites. We wish to formally object to the proposed allocation in Policy SA2 of the Riverside Site as Residential-only in the Regulation 19 version of the Local Plan, and request that this is described as a Mixed Use site in the same way as the Brunel Site.

Background

The policies map of the Regulation 18 version of the Plan identified both the Brunel and Riverside Sites as indicative preferred non-residential sites, reflecting the mixed-use potential of the Interface Land to accommodate a blend of residential, commercial, and community uses. This was consistent with the strategic aims set out in the Council's adopted Chatham Dockyard Interface Land Supplementary Planning Document (SPD), which remains in place as the guiding policy document for future planning of the Interface Land.

The shift to a residential-led allocation for the Riverside Site in the current Regulation 19 draft, but not the Brunel Site which correctly continues as a mixed-use allocation, is a significant and unexplained departure from the established planning framework for the site and is not, in our view, supported by either current market evidence or delivery history.

As the Council will be aware, several attempts have been made over the past 40 years to seek a development partner for the two Interface Land sites which have been unsuccessful, largely because of the overriding heritage and buried archaeological constraints. The most recent prospective development partner, the Vistry Group, has formally withdrawn from the scheme due to financial viability concerns.

Grounds for Objection

We submit that the Residential allocation of the Riverside Site in Policy SA2 and Policies Map ID CCB25 fails to meet the tests of soundness as set out in the National Planning Policy Framework (NPPF), specifically:

a) Positively Prepared

A residential-only designation does not adequately address the cross-cutting strategic needs of the area - including employment, cultural development, and heritage-led regeneration - all of which are vital for balanced growth in Chatham.

b) Justified

There is no evidence that a purely residential scheme is deliverable nor is it the most appropriate strategy for the site. Indeed, historic delivery attempts have repeatedly shown that residential-led models for this site are not financially viable, as recently evidenced by the market failure of the Vistry proposal.

c) Effective

The removal of flexibility undermines the potential for successful delivery. The CHDT considers that a mixed-use approach for both the Riverside and Brunel Sites would create greater scope for partnership, cross-subsidy, and placemaking, enhancing the deliverability of the whole Interface Land scheme in real-world conditions.

d) Consistent with National Policy

The NPPF supports the regeneration of underused land within designated conservation areas through sustainable, mixed-use development, particularly where this enhances the understanding of conservation objectives, supports heritage assets and cultural vitality (Paragraphs 202,203 and 219 of the NPPF 2024). The Historic Dockyard is a designated heritage asset of national significance, and the Interface Land sits within its visual and contextual setting.

CHDT's Vision for a Mixed-Use Future

Our proposal for the Riverside and Brunel sites is to bring forward a heritage-led mixed-use development **for the whole Interface Land consistent with the Council's Interface Land SPD**, incorporating:

- Light commercial and workshop spaces
- Creative industries or community uses
- Public realm improvements
- Some residential development where appropriate
- Strong integration with the Historic Dockyard and wider waterfront regeneration

This vision aligns with:

- The Chatham Interface Land SPD
- **Medway's regeneration strategy**

Homes England's priorities for sustainable and placemaking-led development on the adjoining Chatham Maritime estate.

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.

Request for Modification

We request that the following changes are made:

Paragraph 14.3.2: add the following **sentence at the end of the paragraph**: "Any development proposals must meet the overriding test of complementing and **enhancing the heritage significance and setting of the Historic Dockyard**".

Policy SA2:

1. Delete the reference to the Interface Land as a strategic heritage led housing allocation.
2. (a) Change to read "Combined site areas of the Riverside and Brunel Sites".
(b) Delete "circa 150 new homes as part of"
(e) Delete from "currently" to end of the sentence.

Policies Map ID CCB25: Delete "Residential" and "circa 150"; replace with "Mixed - use" and "0".

This would:

- Return the approach to the Riverside site to that which was described in the Regulation 18 draft, and which continues to be the approach to the Brunel Site
- Correct the inconsistent approach to the Riverside and Brunel Sites which has been adopted without explanation since the Regulation 18 draft
- Enable flexibility for delivery and respond to market reality
- Better reflect the heritage and spatial context of the site

- Provide a sound and sustainable basis for long-term regeneration
- Align with national policy aims for brownfield and heritage asset reuse

We trust that the Council will consider this representation and look forward to continuing our constructive dialogue on the future of the Interface Land. We remain committed to collaborating with Medway Council and relevant stakeholders to ensure the site is brought forward in a manner that is viable, ambitious, and in the best interest of Chatham and the wider Medway 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:

Chatham Historic Dockyard Trust (CHDT) respectfully requests to participate in the relevant hearing sessions of the Local Plan Examination, specifically those addressing site allocations and the spatial strategy for Chatham, including the Riverside and Brunel sites within the Interface Land.

As a significant local stakeholder, landowner, and long-standing partner in **Medway's regeneration, CHDT brings a unique perspective rooted in heritage-**led development and commercial viability. Our objection to the reclassification of the Riverside Site as Residential-only raises substantive concerns about the soundness of the Local Plan under the tests set out in the National Planning Policy Framework (NPPF), particularly regarding being positively prepared, justified, effective, and consistent with national policy.

We believe participation in the hearing sessions is necessary to ensure that the Planning Inspectorate fully considers:

- The evidence base and historic context for previous Mixed-Use designations,
- The economic and delivery implications of a Residential-only allocation in light of recent market failure,
- The alignment of our proposed heritage-led mixed-use model with adopted planning guidance (SPD) and regeneration strategies, and
- The potential impact on the setting of nationally significant heritage assets within the Historic Dockyard.

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>

Date: 7th August 2025
Medway Council
By email only: planning.policy@medway.gov.uk



Kent
Wildlife Trust

Dear Madam/Sir,

RE: Medway Local Plan Regulation 19 Consultation

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Medway Local Plan Regulation 19 consultation. We have reviewed the documents online and have provided comments and recommendations below. Responses have only been provided to matters which fall within KWTs remit. To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format.

Site Allocations

The site allocation process has taken a brownfield first approach. Both brownfield and greenfield sites can be of high environmental value, supporting diverse and threatened species and a wider ecological network. Without in-depth ecological surveys and an assessment of a site's connectivity it cannot be assumed that green belt (including grey belt), greenfield, or brownfield land is of a higher or lower value for nature. To meet the requirements of section 39(2) of the Planning and Compulsory Purchase Act 2004 and the NPPF it is advised that policy requirements for all allocated sites should include specific requirements to demonstrate that the mitigation hierarchy has been followed particularly as part of the masterplan design and the creation of green infrastructure and open space strategies for larger sites. Alongside this requirement site allocation policies should also ensure that extensive ecological surveys are submitted at the application stage together with a demonstration of how the survey results have informed the design and layout of the proposed development.

The volume of development put forward for allocated sites situated adjacent to, or within proximity to, internationally and nationally designated sites as well as other ecologically sensitive locations will likely have detrimental impacts on the interest features of those sites. Allocated land in these locations will also likely result in a cumulative impact leading to significant and long-term effects on species utilising designated and non-designated sites. The supporting Habitats Regulations Assessment and Sustainability Appraisal do not provide sufficient reassurance that irreversible impacts from the volume of development proposed will be avoided.

Of particular concern are the impacts from habitat fragmentation, recreational disturbance, increased domestic pet predation and pollution from noise, lighting and air quality issues because of sites allocated in Capstone Valley, Hoo St Werburgh and Chattenden, and on land west of Strood. With respect to these sites and the supporting Habitats Regulations Assessment and Sustainability Appraisal it is unclear how site selection within the draft Local Plan has followed the mitigation hierarchy. Concerns are raised that the approach taken in selecting sites has been to leave the resolution of all impacts of development to the application stage.

Details on the concerns raised by allocated sites are set out below however, in summary, it is considered that a balanced approach to achieving sustainable development has not been taken when allocating land for development and drafting corresponding policy requirements.

Policy SA7: Capstone Valley

There is a lack of detail on the criteria used to assess the suitability of developments on sites within or adjacent to sensitive ecological features. It is therefore difficult to establish whether the preferred site allocations have considered their potential to result in fragmented habitats and an increase in recreational pressure on priority habitat alongside a reduced area of open space. For example, site allocations LW4, LW6, LW7, and LW8 together with HW3, HW6, and HW11 will lead to approximately 10 blocks of ancient woodland becoming permanently isolated and the habitats and species within Capstone Farm Country Park, Darland Banks Local Nature Reserve and other smaller Local Nature Reserves such as South Wood, facing significant recreational pressure without the provision of any suitable compensation strategy or means of addressing this impact.

As discussed in previous representations on the Local Plan process habitat fragmentation can hinder the movement of animal populations leading to a loss of genetic diversity and reduction in population size, leaving restricted species susceptible to disease. Fragmentation can also result in habitats becoming less resilient, particularly to invasive species and climate change. Ancient woodland now only covers approximately 2.5% of the UK's landmass. Connecting these fragmented blocks of ancient woodland is therefore essential to improve resilience, restore connectivity, and boost biodiversity.

The provision of potential green infrastructure corridors is noted within the Capstone Valley Concept Plan however it is unclear as to whether these corridors or a variation of this design can cope with the volume of development identified within the policy. In addition, it is unclear whether the wording of the draft policy gives sufficient oversight to require each allocated site to adhere to a central masterplan. If not there is no mechanism to ensure that green infrastructure corridors are delivered in a coherent and effective way or at a scale that is sufficient to enhance existing habitats while reducing impacts from a dramatic increase in residents.

Policy SA8: Hoo St Werburgh and Chattenden and Policy SA11: Rural Settlements

With respect to sites identified within the Hoo Peninsula, particularly those to the north and south-west, there is no indication that the required infrastructure works necessary to accommodate the large numbers of additional homes will not detrimentally impact on ecologically sensitive sites. There are also serious concerns about the negative impacts that will occur as a result of habitat loss, increased recreational disturbance, cat predation and detrimental disturbance arising from air, noise and light pollution.

KWT are supportive of the tariff based strategic approach being applied to development within 6 km of designated areas and the delivery of the Bird Wise SAMMS programme. However, it is apparent that this approach will not address issues that will arise from developments falling outside of the 6 km perimeter or impacts to non-designated but biodiverse and ecologically important sites.

The Habitats Regulations Assessment makes clear that this approach may not completely address recreational impacts associated with allocations in close proximity to the North Kent Marshes. The site allocation policy for Hoo St Werburgh and Chattenden sets out that:

"A strategic environmental management plan will be prepared and approved by the Council and Natural England to provide the basis for an integrated programme of measures to safeguard and strengthen the natural environment around Hoo and Chattenden, particularly the SPA, Ramsar sites and SSSIs. Development will contribute towards the implementation of the strategic programme to provide for sustainable development".

Taking into account the ecological sensitivity of the designated areas which may be impacted by the proposed allocations it is of concern that these sites are being put forward as part of the draft Local Plan when it has not been clearly established that a strategic environmental management plan will be effective and sufficient to avoid all detrimental impacts from the proposed developments.

Policy SA6: Land West of Strood

Sites currently allocated for development to the west of Strood (namely SNF1, SNF3 and SR5) provide a strong green infrastructure link between land to the south-west of Medway, such as the North Kent Woods and Downs National Nature Reserve, and sites further to the north-east including Great Chattenden Wood as well as pockets of farmland between the two woodlands and to the north of the motorway. The allocated sites also provide green infrastructure links between smaller sites within Strood, such as Rede Common Local Nature Reserve, and the larger designated sites.

Insufficient information has been provided to demonstrate that consideration has been given to the ecological value of the sites allocated within this part of Strood. There is no information about how the sites are utilised by declining farmland bird species, including ground nesting birds. In addition, the concept plan indicates that a narrow strip of green infrastructure will be provided which is squeezed between the motorway and future housing development rendering it largely inappropriate for species which need wide sightlines and farmland habitat.

The need to deliver new homes, and the significant pressure on Medway to do so, is recognised. However, any land released from the Green Belt should be strategically planned and must retain and improve green and blue infrastructure while creating high quality, nature-rich developments. Green Belt land should only be released for development where it is not of high environmental value. It is not considered that this has been clearly demonstrated in this instance and the concept plan shown within the draft Local Plan indicates that a development led approach has been taken to the allocation of these sites with green infrastructure provision pushed to the margins. While it is noted that this plan is only a concept and not a fleshed-out masterplan the quantum of development listed within Policy SA6 for the allocated sites demonstrates that green infrastructure and habitat restoration or provision is an afterthought.

Detailed ecological surveys must be carried out and published for all land that is being looked at for potential release. Developments on land released from the Green Belt should be required to go above and beyond the local and national requirements for environmental enhancements, including providing a higher level of onsite Biodiversity Net Gain than the statutory 10%.

Biodiversity Net Gain

The State of Nature report for 2023 shows that the abundance of species within England has declined on average by 32% since 1970¹. The report also found that 16% of the 10,000 plus species surveyed risked being lost from Great Britain. The statutory minimum of 10% Biodiversity Net Gain (BNG) is not sufficient to meet the UK's commitments to nature's recovery and to aid in halting the biodiversity crisis. It is therefore imperative that Medway goes beyond this figure.

Kent's natural environment faces exceptional pressures, and it is considered that a 20% BNG target is a proportionate response to address this pressure and that there are compelling reasons to justify such an approach. The Kent Nature Partnership has produced a report which sets out the justification for setting a target of 20% in Kent². This report has been used by local authorities in other authorities who have successfully included a 20% BNG policy in their Local Plan.

Kent County Council has also produced a viability assessment of BNG in Kent³. This report highlights that a shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite. The report also establishes that the biggest cost in most cases is to get to the mandatory, minimum, 10% BNG and that an increase to 15% or 20% BNG costs much less and is generally negligible.

Taking into account the above it is considered that when taking a balanced approach to achieving sustainable development within Medway the requirement to provide a higher BNG than the statutory minimum would not be disproportionate or harmful to development viability.

We hope that the comments made within this letter prove useful in the formation of the Medway Local Plan. We would be more than happy to hold further discussion with you on any of these issues raised.

Yours sincerely,

Nicholas Trower
Planning and Policy Officer
Kent Wildlife Trust

¹ [State of Nature \(2023\)](#)

² [Justification for a Biodiversity Net Gain Target of 20% in Kent](#)

³ [Viability Assessment of Biodiversity Net Gain in Kent](#)

From: [REDACTED]
To: [policy_planning](#)
Cc: [REDACTED]
Subject: Medway Local Plan - comments on draft document
Date: 08 August 2025 12:21:50

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Hell o The City of Rochester Society has given careful consideration of the above draft Plan and submits the following comments : -

1. The plan appears to be ' housing driven ' and in light of the large number of new homes proposed yearly and by 2041 , the Society questions whether these figures are sustainable ? Whilst noting the national formula used for arriving at these housing figures , should not more consideration be given to Medway specifically as an individual area and it's direct needs ?
- 2 . We note the various options for the proposed areas which will accommodate this new housing . Whichever areas are finally allocated , it is imperative that the required infrastructure , in all forms , is actually in place .Currently parts of Medway's infrastructure is not fit for purpose , so the effect of large numbers of additional homes will have even more of an undesirable impact .
3. If ' available , brownfield sites should be used in preference to other categories of land .
- 4 . We note the proposal to ' redevelop ' Medway City Estate , which will include , if approved , some new homes . This is a perfect example of the necessity for transport infrastructure to be in place , particularly as the current situation is already at capacity here .
- 5 .With regard to Protecting the Local Environment , given the housing numbers proposed , this part of the Plan needs strengthening , as the local environment would be under even more threat .
- 6 . There will be huge additional pressure on services such as water (supply & sewerage) , electricity & gas supplies , which the new households will generate Interestingly , Southern Water have just stated publicly that water bills have had to increase as their current infrastructure is outdated and not fit for purpose !These matters will need urgent high priority going forward, to prevent a disastrous outcome for Rochester and the rest of Medway .There should be reassurances on all aspects of water - supply , quality & flooding & flood risk assessments as appropriate are necessary ..

7 . The Plan should deliver successful places and communities , rather than just numbers of homes . There is scope to convert existing empty spaces as well as building new units . Over occupancy should be addressed with more provision for later life homes . This would free up family homes .

8 .Should there be ' height ' restrictions on new development ?

9 . No new hospitals are proposed - surely this should be specific land use , working in conjunction with the NHS ?

10 . The use of solar power should be investigated in all aspects .

11 . Could not ' waterways ' be used for both public and commercial transport - also could not a ' tram ' system (successful in other UK cities) be looked at ?

12 . It is important to have a varied mix of new housing types so as some are lower cost & properly affordable .to local people .

13 .Are ' E scooters ' as proposed , really a credible transport choice ?

14 . There needs to be enforcement on developers to fully carry out their responsibilities and ' promises ' in contributing to the local infrastructure & environment .

15 . Any decisions should be made on evidence based data .

The City of Rochester Society would also very much like to participate in the hearing sessions during the formal examination of the Local Plan . Please could we also be kept fully informed in this regard and also of any other significant changes or further updates . during the process ? Many thanks for your consideration .

Chris Webb , for The City of Rochester Society , 27 Watts Almshouses , Maidstone Road ,
Rochester ME1 1SE 01634 403825 .

From: [REDACTED]
To: [c.webb246](#)
Cc: [REDACTED]
Subject: Re: Medway Local Plan - comments on draft document
Date: 08 August 2025 12:39:39

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Dear Chris

Thank you for all your hard work here. Your points are very well made.

I found it also very disappointing that there was no provision made for a new bridge or tunnels to connect communities when for example this is being considered in the Shetland Islands. The Faroe Islands are already connected by tunnels. I also thought the point about trams was a good one. In Cambridge communities are well connected by such schemes and they are environmentally friendly. It is sad that no thought of this has been considered for Kent and Medway.

Best wishes

Sarah

Sent from my iPhone

On 8 Aug 2025, at 12:21, c.webb246 [REDACTED] > wrote:

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necessity for transport infrastructure to be in place , particularly as the current situation is already at capacity here .

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Maidstone Road , Rochester ME1 1SE 01634
403825 .

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED] [policy_planning](#): [REDACTED]
Subject: Re: Medway Local Plan - comments on draft document
Date: 08 August 2025 15:23:21

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Hi Chris,

Thanks for presenting yesterday.

A couple of thoughts to perhaps build out on some of the points below:

Affordability:

This was said to be at 25%, up to 30% in the villages. It was described as social housing, shared ownership or affordable rent. It is noted that none of the housing is affordable for local people using the conventional way of buying a property ie. with a deposit and mortgage. Shared ownership seems a good deal at the outset, however young buyers are usually stung years into the process by stratospheric service charge hikes coupled with rent hikes (staircasing requires the property to be revalued at the current market rate plus they have to pay valuation and solicitor fees) leaving them quite often in a situation where they cannot afford the increases and cannot sell the property.

Building Height:

Although the notion that none of the new estates will be high rise such as in Croydon East, what is Medway's definition of a tall building? The adoption of the Conservation Framework one year ago did not prevent the council approving a 12 storey tower at Ironmonger's Yard, double the height of any of the other new builds on the neighbouring A2 which are ground plus 5 and a flagrant flouting of any Conservation recommendations.

River use:

Using the river for haulage as happened with the construction of the Thames Tideway Tunnel reduces road congestion / damage, noise, dust and vibration. Will this be a stipulation where this is possible?

Infrastructure:

Building 24,540 new dwellings without the required infrastructure which is already inadequate, will be severely detrimental to the existing population and electorate as well as the incoming residents. Can there be a requirement for a proportion of infrastructure to be built first? Roadways and junctions would ease the construction process, it is noted that already at year 5 the majority of existing junctions are forecast to be at or near capacity.

There are 3 river crossings that already are at capacity at rush hour twice a day. There is nothing in the document regarding an additional river crossing.

Point 10 - do you mean solar power for the roofs of new dwellings?

There is a solar factory (the term 'solar farm' is misleading) at Stoke. Although the Plan does not allocate any land 'at scale' to additional solar factories this therefore

means that the council may well allocate smaller arable land parcels to solar or wind factories. Is this the case? The UK is already food insufficient, producing only around 55% of what it consumes. Food is a strategic resource, droughts, floods or blights overseas will see food ringfenced for those foreign populations, the UK needs to retain all its arable land and not build on it. It is reported that the long term effects of solar factories is to deplete the soil to such an extent that after an estimated 25 years it then would require treatment to bring it back to arable useage, rain runoff also causes pollutants to run into the soil - at that point it could be designated as brownfield land and sold off to developers. This is a national issue of importance. Does Medway recognise this and commit to preserving all Medway arable land from solar / wind factories?

Public transport:

Public road transport is in a parlous state in Medway. Unreliable and insufficient. I absolutely endorse that the building of tramways particularly from the rural parts could be a very good solution - will the council look into this? S106 monies to run additional bus services for two years end at the finish of those two years and do not benefit the population in the long term. Long term solutions are required.

Medway Hospital:

How will the hospital be extended given the footprint constraints? What hospital services will be farmed out to the GP surgeries and what is the criteria for the allocation and the extent of the allocation? How will capacity for acute care and operations be increased for the additional population? What arrangements have been made with neighbouring hospitals and what will be effect of these housing targets on those hospitals? Will they have any capacity for Medway patients if Medway doesn't have any for its own increased population?

KR,

Rosie

On Friday 8 August 2025 at 12:39:34 BST, [REDACTED] wrote:

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- 5 .With regard to Protecting the Local Environment , given the housing numbers proposed , this part of the Plan needs strengthening , as the local environment would be under even more threat .
- 6 . There will be huge additional pressure on services such as water (supply & sewerage) , electricity & gas supplies , which the new households will generate . Interestingly , Southern Water have just stated publicly that water bills have had to increase as their current infrastructure is outdated and not fit for purpose !These matters will need urgent high priority going forward, to prevent a disastrous outcome for Rochester and the rest of Medway .There should be reassurances on all aspects of water - supply , quality & flooding & flood risk assessments as appropriate are necessary ..
- 7 . The Plan should deliver successful places and communities , rather than just numbers of homes . There is scope to convert existing empty spaces as well as building new units . Over occupancy should be addressed with more provision for later life homes . This would free up family homes .
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- 9 . No new hospitals are proposed - surely this should be specific land use , working in conjunction with the NHS ?

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15 . Any decisions should be made on evidence based data .

The City of Rochester Society would also very much like to participate in the hearing sessions during the formal examination of the Local Plan . Please could we also be kept fully informed in this regard and also of any other significant changes or further updates . during the process ? Many thanks for your consideration .

Chris Webb , for The City of Rochester Society , [REDACTED]
[REDACTED]

From: [REDACTED]
To: [policy_planning](#)
Subject: Medway Local Plan draft - City of Rochester Society comments .
Date: 09 August 2025 10:56:16

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

Hello - I refer to my email of */8/25 setting out the City of Rochester Society's comments on the draft Local Plan . I also refer to your acknowledgement of 8/8/25 . I confirm that the Society's comments represent an objection on the grounds of soundness and whether some proposals in the draft Plan are justified & effective in achieving sustainable development .I also confirm that I am happy for you to hold my personal details to enable you to contact me with further Local Plan consultations & updates . Many thanks for your attention .

Chris Webb on behalf of the City of Rochester Society , [REDACTED]
[REDACTED]

From: [REDACTED]
To: [policy_planning](#)
Subject: Fwd: Re: Medway Local Plan - comments on draft document - City of Rochester Society
Date: 09 August 2025 11:19:37

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

Hello - I refer to my email of 8/8/25 setting out the City of Rochester Society's thought & comments on the draft Local Plan . please see below some further thoughts which should be added to my email of 8/8/25 & be regarded as from the City of Rochester Society . The Society also notes that there appears to be no reference to Policing and what provision is there for additional enforcement , police stations & jail places ? As previously , I confirm that this and the comments below represent an objection on the grounds of soundness and whether some proposals in the draft Plan are justified and effective in achieving sustainable development . Many thanks for your attention .

Chris Webb , on behalf of the City of Rochester Society , [REDACTED]
[REDACTED]

----- Original ssage -----

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent: Friday, August 8th 2025, 15:23

Subject: Re: Medway Local Plan - comments on draft document

Hi Chris,

Thanks for presenting yesterday.

A couple of thoughts to perhaps build out on some of the points below:

Affordability:

This was said to be at 25%, up to 30% in the villages. It was described as social housing, shared ownership or affordable rent. It is noted that none of the housing is affordable for local people using the conventional way of buying a property ie. with a deposit and mortgage. Shared ownership seems a good deal at the outset, however young buyers are usually stung years into the process by stratospheric service charge hikes coupled with rent hikes (staircasing requires the property to be revalued at the current market rate plus they have to pay valuation and solicitor fees) leaving them quite often in a situation where they cannot afford the increases and cannot sell the property.

Building Height:

Although the notion that none of the new estates will be high rise such as in Croydon East, what is Medway's definition of a tall building? The

adoption of the Conservation Framework one year ago did not prevent the council approving a 12 storey tower at Ironmonger's Yard, double the height of any of the other new builds on the neighbouring A2 which are ground plus 5 and a flagrant flouting of any Conservation recommendations.

River use:

Using the river for haulage as happened with the construction of the Thames Tideway Tunnel reduces road congestion / damage, noise, dust and vibration. Will this be a stipulation where this is possible?

Infrastructure:

Building 24,540 new dwellings without the required infrastructure which is already inadequate, will be severely detrimental to the existing population and electorate as well as the incoming residents. Can there be a requirement for a proportion of infrastructure to be built first? Roadways and junctions would ease the construction process, it is noted that already at year 5 the majority of existing junctions are forecast to be at or near capacity.

There are 3 river crossings that already are at capacity at rush hour twice a day. There is nothing in the document regarding an additional river crossing.

Point 10 - do you mean solar power for the roofs of new dwellings?

There is a solar factory (the term 'solar farm' is misleading) at Stoke. Although the Plan does not allocate any land 'at scale' to additional solar factories this therefore means that the council may well allocate smaller arable land parcels to solar or wind factories. Is this the case? The UK is already food insufficient, producing only around 55% of what it consumes. Food is a strategic resource, droughts, floods or blights overseas will see food ringfenced for those foreign populations, the UK needs to retain all its arable land and not build on it. It is reported that the long term effects of solar factories is to deplete the soil to such an extent that after an estimated 25 years it then would require treatment to bring it back to arable useage, rain runoff also causes pollutants to run into the soil - at that point it could be designated as brownfield land and sold off to developers. This is a national issue of importance. Does Medway recognise this and commit to preserving all Medway arable land from solar / wind factories?

Public transport:

Public road transport is in a parlous state in Medway. Unreliable and insufficient. I absolutely endorse that the building of tramways particularly from the rural parts could be a very good solution - will the council look into this? S106 monies to run additional bus services for two years end at the finish of those two years and do not benefit the population in the long term. Long term solutions are required.

Medway Hospital:

How will the hospital be extended given the footprint constraints?
What hospital services will be farmed out to the GP surgeries and what is the criteria for the allocation and the extent of the allocation? How will capacity for acute care and operations be increased for the additional population? What arrangements have been made with neighbouring hospitals and what will be effect of these housing targets on those hospitals? Will they have any capacity for Medway patients if Medway doesn't have any for its own increased population?

KR,

Rosie

On Friday 8 August 2025 at 12:39:34 BST, [REDACTED]
wrote:

Dear Chris

Thank you for all your hard work here. Your points are very well made. I found it also very disappointing that there was no provision made for a new bridge or tunnels to connect communities when for example this is being considered in the Shetland Islands. The Faroe Islands are already connected by tunnels. I also thought the point about trams was a good one. In Cambridge communities are well connected by such schemes and they are environmentally friendly. It is sad that no thought of this has been considered for Kent and Medway.
Best wishes

Sarah

Sent from my iPhone

On 8 Aug 2025, at 12:21, [REDACTED]
wrote:

Hell o The City of Rochester Society has given careful consideration of the above draft Plan and submits the following comments : -

1. The plan appears to be ' housing driven ' and in light of the large number of new homes proposed yearly and by 2041 , the Society questions whether these figures are sustainable ? Whilst noting the national formula used for arriving at these housing figures , should not more consideration be given to Medway specifically as an individual area and it's direct needs ?

2 . We note the various options for the proposed areas which will accommodate this new housing . Whichever areas are finally allocated , it is imperative that the required infrastructure , in all forms , is actually in place .Currently parts of Medway's infrastructure is not fit for purpose , so the effect of large numbers of additional homes will have even more of an undesirable impact .

3. If ' available , brownfield sites should be used in preference to other categories of land .

4 . We note the proposal to ' redevelop ' Medway City Estate , which will include , if approved , some new homes . This is a perfect example of the necessity for transport infrastructure to be in place , particularly as the current situation is already at capacity here .

5 .With regard to Protecting the Local Environment , given the housing numbers proposed , this part of the Plan needs strengthening , as the local environment would be under even more threat .

6 . There will be huge additional pressure on services such as water (supply & sewerage) , electricity & gas supplies , which the new households will generate Interestingly , Southern Water have just stated publicly that water bills have had to increase as their current infrastructure is outdated and not fit for purpose !These matters will need urgent high priority going forward, to prevent a disastrous outcome for Rochester and the rest of Medway .There should be reassurances on all aspects of water - supply , quality & flooding & flood risk assessments as appropriate are necessary ..

7 . The Plan should deliver successful places and communities , rather than just numbers of homes . There is scope to convert existing empty spaces as well as building new units . Over occupancy should be addressed with more provision for later life homes . This would free up family homes .

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The City of Rochester Society would also very much like to participate in the hearing sessions during the formal examination of the Local Plan .
Please could we also be kept fully informed in this regard and also of any other significant changes or further updates . during the process ? Many thanks for your consideration .

Chris Webb , for The City of Rochester Society , [REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [policy planning](#)
Subject: Medway Local Plan draft - consultation comments
Date: 11 August 2025 11:28:23

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Hello - further to my previous emails , please now consider the comment set out below : -

It is very disappointing that there appears to be no provision made for a new bridge or tunnels to connect communities , when for example this is actively being considered in the Shetland islands . The Faroe islands are already connected by tunnels .Consideration should also be given to the Council investigating the use of trams to achieve environmentally friendly transport links in terms of the required infrastructure to support the very large amount of new housing proposed .In Cambridge , communities are well connected by such schemes .The omission of these points represents an objection to the Plan on grounds of soundness in achieving a sustainable outcome . Many thanks

Chris Webb , [REDACTED]

Dickens' Country Protection Society



Founder:
Dr. Colin Smith. MA.,BM.,BCh.,MSc.,DCH.,FRCGP

Chairman :
Mr.R.Theobald

Hon.Secretary:
Mrs.P.A Lippiatt



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

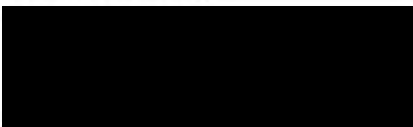
10th August 2025

Dear Mr Harris

Medway Local Plan - Regulation19 Consultation 2025.

Please find herewith the Society's representations in response to the Consultation following the publication of the draft local plan under regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012.

Yours sincerely



Robin Theobald
Chairman Dickens' Country Protection Society

Enc.

Registered Charity number : 264004

Medway Local Plan Section 19 Consultation

Representations by

The Dickens' Country Protection Society

1. Introduction

- 1.1 The Society was formed on the 10th February 1972 with the object of improving, protecting and preserving for the benefit of the public its area of benefit, which is that of the former Strood Rural District Council (now forming part of the Medway Unitary Authority and Gravesham Borough Council areas). For this purpose, but not otherwise, the Society aims to :-

- (a) arouse, form and educate public opinion in order to ensure the promotion of the aforesaid object;
- (b) make representations at Public Inquiries or in such other ways as shall from time to time appear necessary, and
- (c) take such other lawful action as shall be considered appropriate to promote the aforesaid object.

The Society is a registered charity affiliated to the Council for the Protection of Rural England (Kent Branch), and The London Green Belt Council, and was registered with the former Civic Trust as an amenity society. The Society currently has some 35 members.

- 1.2 The Society has taken an active interest in Town and Country Planning for the last 50 years. Its primary objective is the preservation of the countryside. Its activities in this area have included making representations at public inquiries into major developments, taking an interest in and regularly commenting on development control matters in general. The Society has made representations on Local Plans for both of the districts in its area of benefit and appeared at local plan inquiries. The Society has also appeared at the examination in public into the Kent Structure Plan. The Society has had experience of parliamentary procedures having petitioned the Channel Tunnel Rail Link Bill in both Houses of Parliament. The Society has also responded to all the consultations on the Lower Thames Crossing.
- 1.3 The Society commented in detail on the Gravesham Local Plan, Section 18 Review in 2018.

2. The General Background

- 2.1 The Society welcomes this opportunity to comment on the Draft Medway Local Plan and background information published in connection with it. The Society notes the contents of the Medway Local Plan and Draft Proposals Map. The Society's area of benefit extends to areas west of the Medway and the Society's comments are focused on this area.

- 2.2 The Society recognises that the Council has to work within parameters set by Central Government, as defined in the National Planning Guidance and other policy documents. It further recognises that the Council has taken objective professional advice in reaching its conclusions.
- 2.3 In the Society's view, to date the approach of Central Government to housing has for some time shown a total lack of recognition of local conditions, including the available local employment, services and infrastructure and the likely impact of additional housing on existing local communities, adopting a 'one size fits all' approach. In the Society's view, there is a complete lack of any coherent national land use planning.
- 2.4 In the post-war period for about twenty five years, there was active planning with the designation of the Green Belt and the introduction in strategic locations of the New Towns. Government has, in the Society's view, negated its responsibilities transferring what it views as a housing problem on to local authorities with no regard to the consequences.

3. The Response to the Consultation

- 3.1 The Society notes that the Unitary Council has identified a significant number of 'brown field sites' in the urban area that are suitable for development. The Society further notes the land required to meet the assessed housing need exceeds the capacity of the sites within the urban area and, as a result, land will need to be released from other areas. This demand has been further exacerbated by central government setting a target above the locally assessed need. The Society regrets that the current approach of central government fails to take adequate account of local conditions and the impact of development on the local area in establishing the quantity of housing development.
- 3.2 The Society has had regard to the contents of the Council's questionnaire but considers that its views cannot be adequately represented simply responding to the questionnaire. Accordingly, the Society's comments on the main points raised in the questionnaire and Plan are given below.
- 3.3 After examining the proposals maps and having regard to the fact that the plan is intended to extend over a fifteen year period, the Society is horrified by the amount of land being indicated for development. In effect, the urban area west of the river Medway would extend from Strood northwards almost to the village of Stoke.

3.3. Housing Need

- 3.3.1 In the Society's view, the so called housing crisis has not been caused by a lack of land designated for housing development. The problem is primarily one of affordability resulting from changes in the economy and low incomes in relation to housing and other costs. Added to this, land is being traded as a commodity and the value is linked to potential use. Currently, not all the land with valid planning consent is actively being developed. Increasing the amount of land allocated for housing will not necessarily increase the housing supply and reduce the cost of housing. The cost of new housing is controlled by house builders who have no interest in increasing supply to reduce the price. Identifying an excessive amount of land in the short term will result in 'cherry picking' and the less attractive sites in the urban area will remain undeveloped.

- 3.3.2 New housing should meet assessed local need and not simply maximise profit for the developer.

3.4 Location of Development

- 3.4.1. Affordable housing should be located, as far as possible, where living costs are lower since it is aimed at people on lower incomes. Sites should have services and public transport readily available.
- 3.4.2 In the Society's view, there is a need for rural sheltered housing to meet social need, increase mobility, and release existing under occupied housing in rural settlements onto the market. This specific need should be quantified and specific sites in the rural area should be identified and reserved only to meet this need. People who live in rural villages are reluctant to move into sheltered housing in the town even when it is available.
- 3.4.3 Commercial office and retail development should, as far as possible, be directed to town centres to maintain their viability. Siting new development where there are existing facilities and public transport nodes will reduce the need to travel.
- 3.4.4 Industrial development should, as far as possible, be located in or adjoining existing industrial uses to minimise the impact and encourage business cooperation, subject to the local infrastructure having adequate capacity. Identifying areas at the northern end of the Hoo Peninsula is supported in land use terms; it increases the demand for transport and maximum use should be made of the railway.
- 3.4.5 The provision of Community Services should be given high priority in new development to aid the forming of a new community, but it is recognised the local planning authority may identify sites, but provision of facilities is often the duty of other agencies.
- 3.4.6 Energy uses can be problematic in that wind generation may often have an unacceptable impact on landscape. Some industrial areas may have potential sites, subject to the overall impact. Solar farms tend to sterilise areas which would otherwise be productive farm land. Use should be made of the roofs of industrial buildings and warehouses including retail warehouses.

3.5 Priorities

- 3.5.1 The provision of and access to public services should be given a high priority in new development.
- 3.5.2 Hospitals need to be located where they are readily accessible to the people who need them and good public transport can be provided.
- 3.5.3 Emergency services are needed by the whole community and need to have ready access to the main road network.
- 3.5.4 Other facilities need to be locally based e.g. Nursery and Education facilities together with GP surgeries, shops etc to reduce the need to travel.

- 3.5.5 Parks and open spaces need to be adequate and in residential areas or within walking distance from them. Open spaces are needed to promote public health and wellbeing and for recreation.
- 3.5.6 The availability of adequate parking in new residential developments should have a high priority. Public transport in North Kent follows an east-west axis and cannot meet all transport needs. Most households need a car.
- 3.5.7 Retail is, to a large extent, dependent on the availability of adequate parking but in town centres this can often be shared with other users.
- 3.5.8 Rail services are anchored to existing infrastructure and bus services need to feed into existing stations. Parking needs to be available and reasonably priced, near to stations to encourage rail use and discourage long distance commuting by car.
- 3.5.9 Network services; mobile telephone and high speed broadband need to be readily available in all areas and can aid working from home reducing the need to travel.

3.6 Influences on Development

- 3.6.1 The protection of the services to existing residents in the area should be given a high priority. Existing infrastructure should not be overloaded.
- 3.6.2 Traffic congestion is a primary concern. Not only does congestion impact on residents, it has a significant impact on the local economy. Added to this, is the cost related to time taken on every road user that uses that part of the network. In the Society's view, insufficient regard is being paid to the impact of development on traffic congestion.
- 3.6.3 Green areas including incidental green space in residential areas and formal and informal recreational areas in the urban area should be safeguarded and protected from development.
- 3.6.4 The Society is seriously concerned at the potential loss of high grade agricultural land to development. In 1981 only 2.8% of the land in England was identified as grade 1 with a further 14.6% identified as grade 2. This is a finite resource and a relatively high proportion of best land is in Kent, some 8.6%. It should be a fundamental objective of the land use planning system to protect high grade land from development. It is in the national interest that food imports should be reduced and more food should be grown at home. It is noted that a sequential approach is advocated and the Society would expect this approach to be adopted when identifying land for development in the Plan. In the Society's view, development cannot be considered sustainable if it destroys high grade agricultural land.
- 3.6.5 The impact of development on the natural environment, wildlife and biodiversity is important particularly on and in those areas in the Medway recognised locally, nationally and internationally. The Society notes that the North Kent Marshes are of international wildlife importance and protected by international treaty.
- 3.6.6 In a wider context, the dependency of North West Kent on London for employment and the limits resulting from the capacity of existing infrastructure on commuting, must be taken into account in determining the quantum of housing development within the

Medway and adjacent areas. Not only does the infrastructure in the area have to provide for local demand in this part of Kent, it is also required to provide strategic capacity for national cross channel traffic.

4 Settlement Pattern

- 4.1 In general, the Society is opposed to development in the countryside. The Society notes that Medway has absorbed more inward migration than many other areas and a limit should be set on further inward migration. There should not be exponential growth based on previous settlement patterns.
- 4.2 As far as is practical, coalescence between existing settlements should be avoided.

5. Development in the Green Belt

- 5.1 In the Society's view the need for the Green Belt has not diminished. The Society is generally opposed to development in the Green Belt except where there is an established special need (refer to paragraph 3.4.2 above). In the Society's view any development in the Green Belt must be kept to the minimum and take into account the basic objectives of the policy as stated in the National Planning Policy Guidance:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*
- (f) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The Society notes that the objectives listed in the NPPF reflect the original objectives as stated in Ministry of Housing and Local Government Circulars 42/55 and 50/52 in the setting up of the Green Belt. In addition, the Society would submit that in order to maintain open countryside, merging of smaller settlements within the Green Belt should also be avoided.

- 5.2 The Society notes that during the setting up of the Green Belt, Ministry of Housing and Local Government Circulars 50/57 made it clear that the Green Belt should be permanent. Land was intentionally excluded from the Green Belt to provide space for future development (often referred to as 'white land' or 'rural area'). The NPPF restates this in paragraph 142 stating that the "fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". The purpose of the Green Belt is to restrict urban expansion and safeguard the countryside from encroachment. It is implicit therefore that land should not be taken from the Green Belt to facilitate development. In the Society's view, it is not sustainable to seek to remove land from the Green Belt to facilitate development since taken to its logical conclusion all the land designated as Green Belt would then be built on.
- 5.3 It is noted that the area between Gravesend and Dartford was originally part of the Metropolitan Green Belt as defined in the Kent Development Plan and the inset North

West Kent Town Maps. Mineral extraction is a permitted use in the Green Belt and consent was given for the extraction of Chalk for the cement industry. Rather than restoring, part of the former workings to agriculture, these have been developed as a major retail development and the remainder is now being developed as the Ebbsfleet Garden City. The riverside Crossways Development adjacent to the Dartford River Crossing is located in an area that was originally part of the Green Belt. The Society estimates that in the Dartford area some 700ha of land originally designated as Green Belt has been or is being developed. With the development of the Ebbsfleet Garden City, effectively uninterrupted urban development will extend from central London to the eastern fringes of Gravesend.

- 5.4 In Gravesham, the introduction of major infrastructure projects has resulted in the loss of open land from the Green Belt to provide for the Wainscott By-pass, the Channel Tunnel Rail Link, widening of the A2 on two separate occasions and further areas will be lost if the Lower Thames Crossing is built.
- 5.5 In considering releasing land from the Green Belt, the part it plays in the Green Belt set against the five objectives listed in paragraph 5.1 must be a primary consideration. The Green Belt between Gravesend and the Medway Towns is a strategic gap of sub-regional importance. This is now the only area on the south side of the river east of London where the continuous Green Belt abuts the River Thames. When compared with the Green Belt elsewhere this gap is narrow varying between 5 and 7 Km (3 to 5 miles) depending how it is measured and any encroachment will have a major impact. The Annex to Circular 42/55 refers to a belt 7 to 10 miles wide. The release of Green Belt between Gravesend and the Medway Towns including the urban fringe must be avoided.
- 5.6 Considering that the Medway conurbation extends east from Stood to Rainham and from the river Medway to the M2 and appears soon to be enveloping significant parts of the Hoo Peninsula the maintenance of the strategic gap between Medway and Gravesend is even more important. At the same time, development between Medway and Maidstone must also be avoided.
- 5.7 The Society notes the contents of the Council's Green Belt Review which is generally accepted. However, the Society does not accept the conclusion that sites 1, 2, 3 and 4 in the review can be regarded as Grey Belt and released for housing development these are assessed individually disregarding the fact that are adjoining, accept for the A226 corridor, and in the Society's view insufficient weight has been given to the high grade of agricultural land and their location in the strategic gap between the Medway Towns and Gravesend.

6. Assessment of Development Impact

- 6.1 The Society considers it is imperative that the impact of any planned development and population growth is fully assessed. The district and North West Kent in general should not be subject to an incremental deterioration in living and economic conditions.
- 6.2 The growth in population envisaged within Medway and adjacent areas will significantly increase demand on local services. The impact on transport infrastructure in particular could be critical. The Society recognises that assessing the traffic impact of development may be the responsibility of other agencies but this still needs to be quantified and taken into account in its totality in planning development. If the development on the Hoo

Peninsula is realised, traffic on the A228 and on the A2/M2 in particular is likely to be problematic. Current traffic levels on the A2/M2 are significant from 5.30 until 9.30 am Monday to Friday and during the evening peak regularly causing congestion at junctions where roads cross the A2. Increases in traffic resulting from development could result in traffic levels reaching a tipping point.

- 6.3 In the Society's view, seeking to rely on the increased use of public transport is unrealistic. In any event, rail services are already under pressure and little can be done to increase capacity. There could be potential to reintroduce passengers on the Hoo Branch line but there is little evidence of this happening and the impact of this is likely to be marginal.
- 6.4 The changes in traffic flows resulting from the introduction of the proposed Lower Thames Crossing also need to be taken into account. The likely impact on local roads still needs to be fully assessed. Proposed closures and reconfiguring of junctions would have a significant impact and are likely to further increase congestion in the area.
- 6.5 The increased need in service provision resulting from the increase in population needs to be quantified and planned for or the increased levels in population being planned for need to be reduced. As the Local Plan develops, the needs resulting from growth must be quantified in cooperation with neighbouring authorities and reported on in order that the responsible agencies (water supply, drainage, medical facilities, emergency services etc.), Central Government and the public are made aware of the impact of change. A fragmented response with each agency reporting separately at different times will not be satisfactory.

7 Detailed Review of Proposed Housing Sites

- 7.1 This review is based on the identification references' given on each parcel on the Proposals Maps, examining the sites in the Society's area of benefit. In the Society's view, the preservation of high grade agricultural land should be a primary objective of land use planning and given a high priority. Much of the land proposed for development is shown on the Provisional Agricultural Land Classification as Grade 1 or 2. In view of the qualification on the maps, any new areas proposed for development should be the subject of a local land survey. If the land is found to be of good quality, its inclusion on the Proposal Map should be reviewed and central government should be approached to reduce the housing requirements. In the Society's view, building on high grade agricultural land cannot be considered sustainable.

7.2 West of Strood

West of Rede Court Road - Site SNF 1
West of Brompton Farm Road - Site SNF 3
West of Brompton Farm Road - Site SR5

These three sites are all in an area where Green Belt policies apply, and an area of Grade 1 and 2 agricultural land.

The Green Belt is located in the strategic gap between Gravesend and the Medway Towns. Two of the primary objectives of the Green Belt are to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one

another (refer to paragraph 5.1 above). The proposed land use contravenes both these objectives.

The area of these three sites is shown on the Provisional Agricultural Land Classification Map as Grades 1 and 2. This was verified by the evidence given by the consultants on behalf of Kent County Council at the public enquiry into the building of the Wainscot Bypass and the survey carried out by Reading Agricultural Consultants Ltd. in connection with planning application MC/16/2917. It is a long established principle that land in grades 1,2 and 3a should be protected and sequential approach should be adopted to development aimed at preserving the best and most productive agricultural land. It is noted that these areas abut land identified in the Gravesham Section 18 consultation as potential development sites. In the event that they are retained when the Section 19 proposals are released, it is the Society's intention to object to their inclusion.

Conclusion - The Society submits that for these reasons given above these three sites should be removed from the Proposals Map. - **Rejected - Objection**

7.3 Cliffe Village - SRN 51

This area has already been granted planning consent [Objection from DCPS].

Conclusion - **Accept**

7.4 Cliffe Woods

SR 7 Redrow Development - Buckland Road - This area has already been granted planning consent. [strong objection from DCPS] - **Accept**

Conclusion - **Accept**

SR 4 West of Town Road, North of Lillechurch Road, up to Medway boundary (new allocation) The site is shown on the Provisional Agricultural Land Classification Map as Grade 2 land. Land Research Associates, reported land to north to be Grade 3b with some Grade 3a.

The landscape impact could be significant. Adequacy of services, particularly foul drainage.

Conclusion - **Concern / Accept**

SR 14 South of View Road - This area has already been granted planning consent [Objection from DCPS] - Adjoins Site of Special Scientific Interest

Conclusion - **Accept**

7.5 Chattenden/ Hoo St Werburgh

HHH 6 - East of Chattenden Lane - West of Peninsula Way extending north to Deangate.

HHH 8 - Land South West of Hoo St Werburgh -between Ratcliffe Highway and Main Road Hoo. HHH 11 - Land West of area is shown on the Agricultural Land Classification

Map as this area has previously been defended from development. The area is shown on the Agricultural Land Classification Map as Grade 2 and 3 land. This was down graded following detailed survey.

The development of this area will result in merger of Chattenden and Hoo St Werburgh. Development of this land has always been opposed by DCPS because the result was likely to be merger of the two settlements.

Conclusion - **Concern**

HHH 12 - Land South of Main Road Hoo St Werburgh and Hoo St Werburgh to the river Medway. This area is shown on the Agricultural Land Classification Map as Grade 1 becoming Grade 5 as it approaches the river. The wooded escarpment (Gull Down Plantation) is a Site of Special Scientific Interest and should be excluded - There is also a landscape issue - the escarpment facing the river Medway should remain free of development.

Conclusion - **Concern**

7.6 **High Halstow -**

Between High Halstow and Sharnal Street bounded by Christmas Lane and Britannia Road

HHH 26

HHH 29

The sites are shown on the Provisional Agricultural Land Classification Map as Grade 1 land. The survey carried out by Reading Agricultural Consultants Ltd. in connection with planning application MC/23/0855 found the area to be Grade 2 and Grade 3a except for an area in the western end which is Grade 3a and 3b.

The Society submits that in the interest of proper planning the area of site HHH26 should be reduced in the interest of preserving the best agricultural land and that only the western end should be retained as a development site.

Conclusion - **Seeking Modification**

Site HHH 29 Some existing development - lost to agriculture

Conclusion - **Accept**

7.7 **Hoo St Mary - Fenn Street**

AS 6 Fenn Street - This area has already been granted planning consent [comment from DCPS on density]

Conclusion - **Accept**

7.8 **Hoo St Werburgh**

HHH 22 Land North-east of Hoo St Werburgh south of Peninsula Way extending to Stoke Road, west of Roper's Lane. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed survey has been carried out.

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

HHH 31 Land North East of Hoo St Werburgh south of Peninsula Way extending to Stoke Road, east of Roper's Lane bounded by railway. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed land survey has been carried out. -

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

HHH 33 South of Stoke Road Hoo at the End of Roper's Lane. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed land survey has been carried out. -

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

August 2025

Medway Local Plan Section 19 Consultation

Representations by

The Dickens' Country Protection Society

1. Introduction

- 1.1 The Society was formed on the 10th February 1972 with the object of improving, protecting and preserving for the benefit of the public its area of benefit, which is that of the former Strood Rural District Council (now forming part of the Medway Unitary Authority and Gravesham Borough Council areas). For this purpose, but not otherwise, the Society aims to :-

- (a) arouse, form and educate public opinion in order to ensure the promotion of the aforesaid object;
- (b) make representations at Public Inquiries or in such other ways as shall from time to time appear necessary, and
- (c) take such other lawful action as shall be considered appropriate to promote the aforesaid object.

The Society is a registered charity affiliated to the Council for the Protection of Rural England (Kent Branch), and The London Green Belt Council, and was registered with the former Civic Trust as an amenity society. The Society currently has some 35 members.

- 1.2 The Society has taken an active interest in Town and Country Planning for the last 50 years. Its primary objective is the preservation of the countryside. Its activities in this area have included making representations at public inquiries into major developments, taking an interest in and regularly commenting on development control matters in general. The Society has made representations on Local Plans for both of the districts in its area of benefit and appeared at local plan inquiries. The Society has also appeared at the examination in public into the Kent Structure Plan. The Society has had experience of parliamentary procedures having petitioned the Channel Tunnel Rail Link Bill in both Houses of Parliament. The Society has also responded to all the consultations on the Lower Thames Crossing.
- 1.3 The Society commented in detail on the Gravesham Local Plan, Section 18 Review in 2018.

2. The General Background

- 2.1 The Society welcomes this opportunity to comment on the Draft Medway Local Plan and background information published in connection with it. The Society notes the contents of the Medway Local Plan and Draft Proposals Map. The Society's area of benefit extends to areas west of the Medway and the Society's comments are focused on this area.

- 2.2 The Society recognises that the Council has to work within parameters set by Central Government, as defined in the National Planning Guidance and other policy documents. It further recognises that the Council has taken objective professional advice in reaching its conclusions.
- 2.3 In the Society's view, to date the approach of Central Government to housing has for some time shown a total lack of recognition of local conditions, including the available local employment, services and infrastructure and the likely impact of additional housing on existing local communities, adopting a 'one size fits all' approach. In the Society's view, there is a complete lack of any coherent national land use planning.
- 2.4 In the post-war period for about twenty five years, there was active planning with the designation of the Green Belt and the introduction in strategic locations of the New Towns. Government has, in the Society's view, negated its responsibilities transferring what it views as a housing problem on to local authorities with no regard to the consequences.

3. The Response to the Consultation

- 3.1 The Society notes that the Unitary Council has identified a significant number of 'brown field sites' in the urban area that are suitable for development. The Society further notes the land required to meet the assessed housing need exceeds the capacity of the sites within the urban area and, as a result, land will need to be released from other areas. This demand has been further exacerbated by central government setting a target above the locally assessed need. The Society regrets that the current approach of central government fails to take adequate account of local conditions and the impact of development on the local area in establishing the quantity of housing development.
- 3.2 The Society has had regard to the contents of the Council's questionnaire but considers that its views cannot be adequately represented simply responding to the questionnaire. Accordingly, the Society's comments on the main points raised in the questionnaire and Plan are given below.
- 3.3 After examining the proposals maps and having regard to the fact that the plan is intended to extend over a fifteen year period, the Society is horrified by the amount of land being indicated for development. In effect, the urban area west of the river Medway would extend from Strood northwards almost to the village of Stoke.

3.3. Housing Need

- 3.3.1 In the Society's view, the so called housing crisis has not been caused by a lack of land designated for housing development. The problem is primarily one of affordability resulting from changes in the economy and low incomes in relation to housing and other costs. Added to this, land is being traded as a commodity and the value is linked to potential use. Currently, not all the land with valid planning consent is actively being developed. Increasing the amount of land allocated for housing will not necessarily increase the housing supply and reduce the cost of housing. The cost of new housing is controlled by house builders who have no interest in increasing supply to reduce the price. Identifying an excessive amount of land in the short term will result in 'cherry picking' and the less attractive sites in the urban area will remain undeveloped.

- 3.3.2 New housing should meet assessed local need and not simply maximise profit for the developer.

3.4 Location of Development

- 3.4.1. Affordable housing should be located, as far as possible, where living costs are lower since it is aimed at people on lower incomes. Sites should have services and public transport readily available.
- 3.4.2 In the Society's view, there is a need for rural sheltered housing to meet social need, increase mobility, and release existing under occupied housing in rural settlements onto the market. This specific need should be quantified and specific sites in the rural area should be identified and reserved only to meet this need. People who live in rural villages are reluctant to move into sheltered housing in the town even when it is available.
- 3.4.3 Commercial office and retail development should, as far as possible, be directed to town centres to maintain their viability. Siting new development where there are existing facilities and public transport nodes will reduce the need to travel.
- 3.4.4 Industrial development should, as far as possible, be located in or adjoining existing industrial uses to minimise the impact and encourage business cooperation, subject to the local infrastructure having adequate capacity. Identifying areas at the northern end of the Hoo Peninsula is supported in land use terms; it increases the demand for transport and maximum use should be made of the railway.
- 3.4.5 The provision of Community Services should be given high priority in new development to aid the forming of a new community, but it is recognised the local planning authority may identify sites, but provision of facilities is often the duty of other agencies.
- 3.4.6 Energy uses can be problematic in that wind generation may often have an unacceptable impact on landscape. Some industrial areas may have potential sites, subject to the overall impact. Solar farms tend to sterilise areas which would otherwise be productive farm land. Use should be made of the roofs of industrial buildings and warehouses including retail warehouses.

3.5 Priorities

- 3.5.1 The provision of and access to public services should be given a high priority in new development.
- 3.5.2 Hospitals need to be located where they are readily accessible to the people who need them and good public transport can be provided.
- 3.5.3 Emergency services are needed by the whole community and need to have ready access to the main road network.
- 3.5.4 Other facilities need to be locally based e.g. Nursery and Education facilities together with GP surgeries, shops etc to reduce the need to travel.

- 3.5.5 Parks and open spaces need to be adequate and in residential areas or within walking distance from them. Open spaces are needed to promote public health and wellbeing and for recreation.
- 3.5.6 The availability of adequate parking in new residential developments should have a high priority. Public transport in North Kent follows an east-west axis and cannot meet all transport needs. Most households need a car.
- 3.5.7 Retail is, to a large extent, dependent on the availability of adequate parking but in town centres this can often be shared with other users.
- 3.5.8 Rail services are anchored to existing infrastructure and bus services need to feed into existing stations. Parking needs to be available and reasonably priced, near to stations to encourage rail use and discourage long distance commuting by car.
- 3.5.9 Network services; mobile telephone and high speed broadband need to be readily available in all areas and can aid working from home reducing the need to travel.

3.6 Influences on Development

- 3.6.1 The protection of the services to existing residents in the area should be given a high priority. Existing infrastructure should not be overloaded.
- 3.6.2 Traffic congestion is a primary concern. Not only does congestion impact on residents, it has a significant impact on the local economy. Added to this, is the cost related to time taken on every road user that uses that part of the network. In the Society's view, insufficient regard is being paid to the impact of development on traffic congestion.
- 3.6.3 Green areas including incidental green space in residential areas and formal and informal recreational areas in the urban area should be safeguarded and protected from development.
- 3.6.4 The Society is seriously concerned at the potential loss of high grade agricultural land to development. In 1981 only 2.8% of the land in England was identified as grade 1 with a further 14.6% identified as grade 2. This is a finite resource and a relatively high proportion of best land is in Kent, some 8.6%. It should be a fundamental objective of the land use planning system to protect high grade land from development. It is in the national interest that food imports should be reduced and more food should be grown at home. It is noted that a sequential approach is advocated and the Society would expect this approach to be adopted when identifying land for development in the Plan. In the Society's view, development cannot be considered sustainable if it destroys high grade agricultural land.
- 3.6.5 The impact of development on the natural environment, wildlife and biodiversity is important particularly on and in those areas in the Medway recognised locally, nationally and internationally. The Society notes that the North Kent Marshes are of international wildlife importance and protected by international treaty.
- 3.6.6 In a wider context, the dependency of North West Kent on London for employment and the limits resulting from the capacity of existing infrastructure on commuting, must be taken into account in determining the quantum of housing development within the

Medway and adjacent areas. Not only does the infrastructure in the area have to provide for local demand in this part of Kent, it is also required to provide strategic capacity for national cross channel traffic.

4 Settlement Pattern

- 4.1 In general, the Society is opposed to development in the countryside. The Society notes that Medway has absorbed more inward migration than many other areas and a limit should be set on further inward migration. There should not be exponential growth based on previous settlement patterns.
- 4.2 As far as is practical, coalescence between existing settlements should be avoided.

5. Development in the Green Belt

- 5.1 In the Society's view the need for the Green Belt has not diminished. The Society is generally opposed to development in the Green Belt except where there is an established special need (refer to paragraph 3.4.2 above). In the Society's view any development in the Green Belt must be kept to the minimum and take into account the basic objectives of the policy as stated in the National Planning Policy Guidance:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*
- (f) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The Society notes that the objectives listed in the NPPF reflect the original objectives as stated in Ministry of Housing and Local Government Circulars 42/55 and 50/52 in the setting up of the Green Belt. In addition, the Society would submit that in order to maintain open countryside, merging of smaller settlements within the Green Belt should also be avoided.

- 5.2 The Society notes that during the setting up of the Green Belt, Ministry of Housing and Local Government Circulars 50/57 made it clear that the Green Belt should be permanent. Land was intentionally excluded from the Green Belt to provide space for future development (often referred to as 'white land' or 'rural area'). The NPPF restates this in paragraph 142 stating that the "fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". The purpose of the Green Belt is to restrict urban expansion and safeguard the countryside from encroachment. It is implicit therefore that land should not be taken from the Green Belt to facilitate development. In the Society's view, it is not sustainable to seek to remove land from the Green Belt to facilitate development since taken to its logical conclusion all the land designated as Green Belt would then be built on.
- 5.3 It is noted that the area between Gravesend and Dartford was originally part of the Metropolitan Green Belt as defined in the Kent Development Plan and the inset North

West Kent Town Maps. Mineral extraction is a permitted use in the Green Belt and consent was given for the extraction of Chalk for the cement industry. Rather than restoring, part of the former workings to agriculture, these have been developed as a major retail development and the remainder is now being developed as the Ebbsfleet Garden City. The riverside Crossways Development adjacent to the Dartford River Crossing is located in an area that was originally part of the Green Belt. The Society estimates that in the Dartford area some 700ha of land originally designated as Green Belt has been or is being developed. With the development of the Ebbsfleet Garden City, effectively uninterrupted urban development will extend from central London to the eastern fringes of Gravesend.

- 5.4 In Gravesham, the introduction of major infrastructure projects has resulted in the loss of open land from the Green Belt to provide for the Wainscott By-pass, the Channel Tunnel Rail Link, widening of the A2 on two separate occasions and further areas will be lost if the Lower Thames Crossing is built.
- 5.5 In considering releasing land from the Green Belt, the part it plays in the Green Belt set against the five objectives listed in paragraph 5.1 must be a primary consideration. The Green Belt between Gravesend and the Medway Towns is a strategic gap of sub-regional importance. This is now the only area on the south side of the river east of London where the continuous Green Belt abuts the River Thames. When compared with the Green Belt elsewhere this gap is narrow varying between 5 and 7 Km (3 to 5 miles) depending how it is measured and any encroachment will have a major impact. The Annex to Circular 42/55 refers to a belt 7 to 10 miles wide. The release of Green Belt between Gravesend and the Medway Towns including the urban fringe must be avoided.
- 5.6 Considering that the Medway conurbation extends east from Stood to Rainham and from the river Medway to the M2 and appears soon to be enveloping significant parts of the Hoo Peninsula the maintenance of the strategic gap between Medway and Gravesend is even more important. At the same time, development between Medway and Maidstone must also be avoided.
- 5.7 The Society notes the contents of the Council's Green Belt Review which is generally accepted. However, the Society does not accept the conclusion that sites 1, 2, 3 and 4 in the review can be regarded as Grey Belt and released for housing development these are assessed individually disregarding the fact that are adjoining, accept for the A226 corridor, and in the Society's view insufficient weight has been given to the high grade of agricultural land and their location in the strategic gap between the Medway Towns and Gravesend.

6. Assessment of Development Impact

- 6.1 The Society considers it is imperative that the impact of any planned development and population growth is fully assessed. The district and North West Kent in general should not be subject to an incremental deterioration in living and economic conditions.
- 6.2 The growth in population envisaged within Medway and adjacent areas will significantly increase demand on local services. The impact on transport infrastructure in particular could be critical. The Society recognises that assessing the traffic impact of development may be the responsibility of other agencies but this still needs to be quantified and taken into account in its totality in planning development. If the development on the Hoo

Peninsula is realised, traffic on the A228 and on the A2/M2 in particular is likely to be problematic. Current traffic levels on the A2/M2 are significant from 5.30 until 9.30 am Monday to Friday and during the evening peak regularly causing congestion at junctions where roads cross the A2. Increases in traffic resulting from development could result in traffic levels reaching a tipping point.

- 6.3 In the Society's view, seeking to rely on the increased use of public transport is unrealistic. In any event, rail services are already under pressure and little can be done to increase capacity. There could be potential to reintroduce passengers on the Hoo Branch line but there is little evidence of this happening and the impact of this is likely to be marginal.
- 6.4 The changes in traffic flows resulting from the introduction of the proposed Lower Thames Crossing also need to be taken into account. The likely impact on local roads still needs to be fully assessed. Proposed closures and reconfiguring of junctions would have a significant impact and are likely to further increase congestion in the area.
- 6.5 The increased need in service provision resulting from the increase in population needs to be quantified and planned for or the increased levels in population being planned for need to be reduced. As the Local Plan develops, the needs resulting from growth must be quantified in cooperation with neighbouring authorities and reported on in order that the responsible agencies (water supply, drainage, medical facilities, emergency services etc.), Central Government and the public are made aware of the impact of change. A fragmented response with each agency reporting separately at different times will not be satisfactory.

7 Detailed Review of Proposed Housing Sites

- 7.1 This review is based on the identification references' given on each parcel on the Proposals Maps, examining the sites in the Society's area of benefit. In the Society's view, the preservation of high grade agricultural land should be a primary objective of land use planning and given a high priority. Much of the land proposed for development is shown on the Provisional Agricultural Land Classification as Grade 1 or 2. In view of the qualification on the maps, any new areas proposed for development should be the subject of a local land survey. If the land is found to be of good quality, its inclusion on the Proposal Map should be reviewed and central government should be approached to reduce the housing requirements. In the Society's view, building on high grade agricultural land cannot be considered sustainable.

7.2 West of Strood

West of Rede Court Road - Site SNF 1
West of Brompton Farm Road - Site SNF 3
West of Brompton Farm Road - Site SR5

These three sites are all in an area where Green Belt policies apply, and an area of Grade 1 and 2 agricultural land.

The Green Belt is located in the strategic gap between Gravesend and the Medway Towns. Two of the primary objectives of the Green Belt are to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one

another (refer to paragraph 5.1 above). The proposed land use contravenes both these objectives.

The area of these three sites is shown on the Provisional Agricultural Land Classification Map as Grades 1 and 2. This was verified by the evidence given by the consultants on behalf of Kent County Council at the public enquiry into the building of the Wainscot Bypass and the survey carried out by Reading Agricultural Consultants Ltd. in connection with planning application MC/16/2917. It is a long established principle that land in grades 1,2 and 3a should be protected and sequential approach should be adopted to development aimed at preserving the best and most productive agricultural land. It is noted that these areas abut land identified in the Gravesham Section 18 consultation as potential development sites. In the event that they are retained when the Section 19 proposals are released, it is the Society's intention to object to their inclusion.

Conclusion - The Society submits that for these reasons given above these three sites should be removed from the Proposals Map. - **Rejected - Objection**

7.3 Cliffe Village - SRN 51

This area has already been granted planning consent [Objection from DCPS].

Conclusion - **Accept**

7.4 Cliffe Woods

SR 7 Redrow Development - Buckland Road - This area has already been granted planning consent. [strong objection from DCPS] - **Accept**

Conclusion - **Accept**

SR 4 West of Town Road, North of Lillechurch Road, up to Medway boundary (new allocation) The site is shown on the Provisional Agricultural Land Classification Map as Grade 2 land. Land Research Associates, reported land to north to be Grade 3b with some Grade 3a.

The landscape impact could be significant. Adequacy of services, particularly foul drainage.

Conclusion - **Concern / Accept**

SR 14 South of View Road - This area has already been granted planning consent [Objection from DCPS] - Adjoins Site of Special Scientific Interest

Conclusion - **Accept**

7.5 Chattenden/ Hoo St Werburgh

HHH 6 - East of Chattenden Lane - West of Peninsula Way extending north to Deangate.

HHH 8 - Land South West of Hoo St Werburgh -between Ratcliffe Highway and Main Road Hoo. HHH 11 - Land West of area is shown on the Agricultural Land Classification

Map as this area has previously been defended from development. The area is shown on the Agricultural Land Classification Map as Grade 2 and 3 land. This was down graded following detailed survey.

The development of this area will result in merger of Chattenden and Hoo St Werburgh. Development of this land has always been opposed by DCPS because the result was likely to be merger of the two settlements.

Conclusion - **Concern**

HHH 12 - Land South of Main Road Hoo St Werburgh and Hoo St Werburgh to the river Medway. This area is shown on the Agricultural Land Classification Map as Grade 1 becoming Grade 5 as it approaches the river. The wooded escarpment (Gull Down Plantation) is a Site of Special Scientific Interest and should be excluded - There is also a landscape issue - the escarpment facing the river Medway should remain free of development.

Conclusion - **Concern**

7.6 High Halstow -

Between High Halstow and Sharnal Street bounded by Christmas Lane and Britannia Road

HHH 26

HHH 29

The sites are shown on the Provisional Agricultural Land Classification Map as Grade 1 land. The survey carried out by Reading Agricultural Consultants Ltd. in connection with planning application MC/23/0855 found the area to be Grade 2 and Grade 3a except for an area in the western end which is Grade 3a and 3b.

The Society submits that in the interest of proper planning the area of site HHH26 should be reduced in the interest of preserving the best agricultural land and that only the western end should be retained as a development site.

Conclusion - **Seeking Modification**

Site HHH 29 Some existing development - lost to agriculture

Conclusion - **Accept**

7.7 Hoo St Mary - Fenn Street

AS 6 Fenn Street - This area has already been granted planning consent [comment from DCPS on density]

Conclusion - **Accept**

7.8 Hoo St Werburgh

HHH 22 Land North-east of Hoo St Werburgh south of Peninsula Way extending to Stoke Road, west of Roper's Lane. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed survey has been carried out.

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

HHH 31 Land North East of Hoo St Werburgh south of Peninsula Way extending to Stoke Road, east of Roper's Lane bounded by railway. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed land survey has been carried out. -

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

HHH 33 South of Stoke Road Hoo at the End of Roper's Lane. The site is shown on the Provisional Agricultural Land Classification Map as Grade 1 land. As far as the Society is aware, no detailed land survey has been carried out. -

Conclusion - The Society to **Seek Agricultural Land Survey and Review.**

August 2025

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Mr	
First Name	Michael	
Last Name	Pearce	
Job Title (where relevant)	Secretary	
Organisation (where relevant)	AHPP	
Address Line 1		
Line 2	Hoo	
Line 3	Rochester	
Line 4	Kent	
Post Code	ME3	
Telephone Number		
E-mail Address (where relevant)	allianceofhoopeninsula	parishes@gmail.com

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.

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

See representation:

AHPP Representation

(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.

See representation:

AHPP Representation

(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)

☐ TICK

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:

The Alliance of Hoo Peninsula Parishes (AHPP) would like to participate in the hearing sessions and will have professional representation. We are awaiting details of the person concerned.

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>



THE ALLIANCE OF
**Hoo Peninsula
Parishes**

Representation in response to

Medway Council's

Regulation 19

Medway Local Plan 2041

*Proposed Submission Draft
and Supporting Documents*

June 2025

Sunday 10th August 2025

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CHAPTER 1: EXECUTIVE SUMMARY

The Alliance of Hoo Peninsula Parishes (AHPP) includes the following Parish Council members:

***Allhallows Parish Council**

Cooling Parish Council

Frindsbury Extra Parish Council

High Halstow Parish Council

****Higham Parish Council**

Hoo St Werburgh & Chattenden Parish Council

St James, Isle of Grain Parish Council

St Mary Hoo Parish Council

Stoke Parish Council

AHPP was established soon after Medway Council launched its six-week Regulation 19 consultation.

**Allhallows Parish Council is a member of the AHPP but did not respond in time (before Sunday 10th August 2025) in order to sign this representation. Mrs Louise Putnam (Treasurer) has signed the letter on behalf of Allhallows Action Group (AAG).*

***Higham Parish Council is within the Gravesham Borough Council area. The remaining members of AHPP are within the Medway Council area.*

The following Parish Councils are not currently members of AHPP:

Cliffe and Cliffe Woods Parish Council - located on the Hoo Peninsula (Medway Council area) - at the time of submitting this representation, C&CW Parish Council had not yet been formally invited to join AHPP.

Cuxton Parish Council - this parish council is not located on the Hoo Peninsula and has not yet been invited to join AHPP as an associate member.

Halling Parish Council - this parish council is not located on the Hoo Peninsula and has not yet been invited to join AHPP as an associate member.

Individual members of the Alliance may submit their own representations, concerning the specific issues and matters relating to their parish and community.

This high-level representation from AHPP identifies serious and systemic failures in Medway Council's Regulation 19 draft Local Plan (June 2025), which affects the whole of the Hoo Peninsula, concluding that:

- **It is not legally compliant**, owing to failures to meet statutory requirements including proper community engagement, compliance with the SEA Directive, and inconsistencies with adopted neighbourhood plans.
- **It is not sound**, as it is neither justified, effective, positively prepared, nor consistent with national policy.
- **It fails the Duty to Cooperate**, particularly with regards to meaningful and demonstrable collaboration with neighbouring authorities and statutory consultees on cross-boundary strategic matters.

Furthermore, this representation makes the case that:

- **All strategic allocations on the Hoo Peninsula must be removed** from the Local Plan due to their conflict with national planning policy and demonstrable unsustainability across ecological, environmental, infrastructure, transport, water, health, education, and community constraints.
- The Hoo Peninsula is a **distinct and irreplaceable rural community** with:
 - **Nationally and internationally protected habitats** (SSSIs, NNRs, SPAs and RAMSAR sites)
 - **Grade 1 agricultural land**, vital for national food security
 - **Historic and valued landscapes** reflected and protected by adopted Neighbourhood Plans

This representation also highlights numerous points of **non-compliance with the Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)**. There are two adopted Neighbourhood Plans within the Hoo Peninsula area: the Hoo St Werburgh & Chattenden Neighbourhood Plan (2024) and the Cliffe & Cliffe Woods Neighbourhood Plan (2023).

This representation demonstrates that the draft Local Plan cannot meet the basic tests of soundness or legality without major revision and the removal of the proposed allocations across the Hoo Peninsula.

Each subsequent chapter of this representation will address these issues in detail, beginning with **Chapter 2: Legal Non-Compliance**.

CHAPTER 2: LEGAL NON-COMPLIANCE

This chapter sets out how Medway Council's Regulation 19 Draft Local Plan (June 2025) fails to meet legal requirements set out in planning legislation, the NPPF (December 2024), and case law. These failures are compounded by direct conflicts with an adopted Hoo Peninsula Neighbourhood Plan: the **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)**.

2.1. Failure to Comply with the Town and Country Planning (Local Planning) (England) Regulations 2012

a. Non-compliance with Regulation 19 Requirements for Pre-submission Consultation

The Regulation 19 draft Plan consultation (30 June to 11 August 2025) fails the test of legality due to:

- **Insufficient transparency and accessibility of supporting evidence.**
 - Key technical reports (e.g. updated Air Quality Assessment for the HRA) were labelled “interim” and were not available in final form.
 - The Habitats Regulations Assessment published in June 2025 was explicitly described as **incomplete**, contrary to the requirement under **Regulation 19(b)** for the plan to be accompanied by a complete HRA under Article 6(3) of the Habitats Directive.

b. Inadequate Duty to Co-operate Documentation under Regulation 4

- Regulation 4 requires LPAs to demonstrate co-operation across local boundaries. However, the Council’s **Duty to Cooperate Statement** (2025) and **Statements of Common Ground** remain:
 - Incomplete
 - Generic in their treatment of cross-boundary issues
 - **Failing to provide measurable outcomes or evidence of effective policy alignment**, particularly in relation to transport, air quality, water infrastructure, and ecological impacts arising from proposed development on the Hoo Peninsula.

2.2. Failure to Comply with the Strategic Environmental Assessment (SEA) Directive

a. Non-compliance with Directive 2001/42/EC (SEA Directive)

Under UK legislation (Environmental Assessment of Plans and Programmes Regulations 2004), all Local Plans must undergo proper SEA. However:

- The **Sustainability Appraisal (SA) (2025)** fails to objectively assess reasonable alternatives.
 - For example, the Hoo Peninsula strategic allocations were appraised **after** their inclusion as preferred sites, contrary to legal requirement for iterative and open testing.
 - The SA report presents site options and growth strategies without a **consistent comparative framework**.
- The SA does not provide **evidence of how environmental limits have influenced strategic choices** in any meaningful way, especially relating to:
 - Water and wastewater infrastructure
 - Air quality impacts on internationally protected sites
 - Soil and land degradation
 - Transport capacity on the peninsula

These failures echo issues found in *Heard v Broadland DC* [2012] and *Save Stonehenge World Heritage Site Ltd v Secretary of State for Transport* [2021].

2.3. Inconsistency with National Policy (NPPF 2024) and the Statutory Development Plan

a. Conflict with Paragraph 13 and Footnote 29 of the NPPF

Paragraph 13 of the NPPF 2024 requires Local Plans to reflect relevant Neighbourhood Plans. However:

- The Regulation 19 draft Local Plan **fails to align** with the **Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)** on:
 - Local infrastructure capacity
 - Landscape and ecological protection
 - Design standards
 - Settlement boundaries
 - Community facility provision
 - Scale and phasing of development

The statutory Neighbourhood Plans are part of the development plan and must be given full weight unless superseded.

b. Breach of Paragraph 35 of the NPPF: Legal Tests of Soundness

- The Local Plan is not “justified” because it is **not based on a proportionate evidence base**.
- It is not “effective” due to fundamental constraints (transport, ecology, water) not being resolvable during the plan period.
- It is not “positively prepared” as it **ignores the constraints and community-led evidence** in the adopted Neighbourhood Plans.
- It is not “consistent with national policy” as it:
 - Undermines RAMSARs, SPAs, SSSIs, NNRs, and ancient woodland
 - Allocates housing on Grade 1 agricultural land
 - Ignores maximising vacant brownfield regeneration and urban/suburban potential elsewhere

2.4. Conflict with the Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)

The draft Local Plan directly contradicts key objectives and policies of the Hoo St Werburgh & Chattenden Neighbourhood Plan:

Neighbourhood Plan Policy	Conflict with Regulation 19 Local Plan
HOO4 (Housing Growth and Mix)	Local Plan allocations significantly exceed locally-supported growth scale and ignore need for infrastructure upgrades for the existing population
HOO8 (Landscape and Environment)	Strategic allocations degrade and remove sensitive valued natural landscapes and wildlife corridors (Chattenden Valley)
HOO10 (Air Quality)	Plan does not secure adequate mitigation for worsening air pollution
HOO11 (Transport and Active Travel)	Local Plan proposes car-dependent development contrary to sustainable movement objectives

2.5. Inadequate Regard for Environmental Designations under the Habitats Regulations

The Hoo Peninsula contains:

- **RAMSAR wetlands**
- **Special Protection Areas (SPAs)**
- **Sites of Special Scientific Interest (SSSIs)**
- **National Nature Reserves (NNRs)**
- **Ancient woodland**
- **Kent Downs National Landscape buffer zones**

The plan fails to demonstrate:

- **No Adverse Effect on Integrity (AEoI)** for these sites (requirement under Habitats Regulations)
- **Delivery of strategic mitigation** (e.g. SAMMS is not clearly secured or funded)
- **Realistic avoidance of cumulative impacts** (in-combination effects have been understated or deferred)

The **Habitats Regulations Assessment (2025)** is interim and legally deficient, undermining the Plan's submission.

Conclusion: Chapter 2

The Medway Council Regulation 19 draft Local Plan fails to meet statutory legal requirements due to:

- Non-compliance with the SEA Directive
- Incomplete or flawed Habitat Regulations Assessment
- Procedural failures under Regulation 19 of the Town and Country Planning Regulations
- Disregard of legal obligations under the Duty to Cooperate
- Fundamental inconsistency with national policy and adopted neighbourhood plans

These legal failures alone are sufficient to require the withdrawal and redrafting of the Plan prior to submission.

CHAPTER 3: FAILURE TO COMPLY WITH THE DUTY TO COOPERATE

This chapter outlines how Medway Council's Regulation 19 Draft Local Plan (June 2025) fails the statutory **Duty to Cooperate (DtC)** under **Section 33A of the Planning and Compulsory Purchase Act 2004**, **Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012**, and **Paragraphs 24–27 of the NPPF (2024)**.

The Duty to Cooperate is a legal requirement and is tested at the submission stage. If failed, the plan cannot proceed to adoption.

3.1. Legal Context: What the Duty Requires

Under Section 33A, local authorities must:

- Engage constructively, actively and on an ongoing basis with prescribed bodies.
- Address strategic cross-boundary matters including:
 - Housing and infrastructure
 - Biodiversity and habitat impact
 - Transport and connectivity
 - Flood risk and water resources
 - Health and education service provision

Per **Paragraph 25 of the NPPF (2024)**:

"Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans."

3.2. Overview of Medway Council's Failure to Satisfy the Duty

Medway Council's Duty to Cooperate Report (2025) and its composite Statement of Common Ground demonstrate:

- **Minimal, reactive engagement**
- **No formal engagement with Hoo St Werburgh & Chattenden Parish Council (qualifying body) concerning an adopted Neighbourhood Plan**
- **No outcome-based agreements** on key strategic matters
- **Lack of evidence** that neighbouring authorities or prescribed bodies agree with the development strategy - particularly regarding:
 - The Hoo Peninsula
 - Housing need distribution
 - Transport and environmental capacity

a. Inadequate Engagement with Neighbouring LPAs

The draft Plan makes limited references to joint work with:

- **Gravesham Borough Council**
- **Maidstone District Council**
- **Tonbridge and Malling Borough Council**
- **Swale Borough Council**

However, it fails to:

- Demonstrate how any **unmet need** (e.g. from Gravesham Borough Council) is to be addressed
- Show **policy alignment or shared infrastructure plans** on cross-border matters such as:
 - Lidsing Garden Community (Maidstone)
 - Strategic road infrastructure (e.g. M2, Lower Thames Crossing)
 - Environmental impact mitigation for shared SPA sites

This is compounded by **no evidence of agreed Statements of Common Ground** specifically resolving the impacts of Medway Council's proposed housing allocations on:

- Air quality
- Highways (strategic and local)

- Ecological networks

b. Failure to Cooperate with Infrastructure Providers

There is **no published agreement** with:

- **NHS Kent and Medway ICB** (despite acute pressures in primary and secondary care)
- **Southern Water and the Environment Agency** (despite the Hoo Peninsula being in a ‘severely water stressed’ area)
- **National Highways** (despite expected significant A228, A289, and M2 junction impacts from Hoo allocations)

In contrast, the **Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)** identifies evidence of existing infrastructure deficit. Yet the Local Plan proposes:

- **Over 5,000 houses** on the Hoo Peninsula (impacting the whole of the Hoo Peninsula) without secured delivery of:
 - Significant transport infrastructure
 - Strategic education infrastructure
 - Health facilities
 - Drainage and water upgrades

The Infrastructure Delivery Plan lacks certainty over funding and delivery timescales and does not appear to have been tested or agreed with key statutory providers.

3.3. Specific Failures in Relation to Hoo Peninsula Allocations

a. Housing Growth Not Justified or Supported by Cross-Boundary Strategy

The scale of housing proposed for Hoo St Werburgh and Chattenden is **disproportionate** to local needs and capacity:

- The **Hoo St Werburgh & Chattenden Neighbourhood Plan** explicitly supports only **proportionate and sustainable growth**, not large-scale strategic allocations.
- The plan allocates land with **no agreement with neighbouring authorities** on how the resulting:
 - **Traffic**
 - **Air quality impacts**
 - **Wastewater burden**
 - **SPA visitor pressure**
 ...will be addressed in-combination.

This directly breaches *Paragraphs 24, 25, 26, 27 and 28 of the NPPF*.

b. Environmental Capacity of the Estuary Has Not Been Cooperatively Managed

The Thames Estuary is subject to:

- **RAMSAR designation**
- **The North Kent Marshes SPA**
- **National Nature Reserves and SSSIs**

The Council's **interim** Habitats Regulations Assessment (HRA) admits that **in-combination air quality impacts have not yet been assessed**. This is legally fatal under the **People Over Wind v Coillte Teoranta** judgment (CJEU, 2018), which forbids adoption or submission of a plan before concluding a full HRA.

Moreover, **SAMMS (Strategic Access Management and Monitoring Strategy)** mitigation is not demonstrably funded or agreed with Natural England.

3.4. Comparison with Neighbourhood Plans

Hoo St Werburgh & Chattenden Neighbourhood Plan (2024) Findings

Policy HOO11 and supporting evidence require:

- Delivery of new transport infrastructure before significant new development
- Protection of internationally designated habitats through enforceable mitigation
- A coordinated, integrated approach to service delivery

The Local Plan's failure to secure these through cross-boundary cooperation renders it legally non-compliant. The Local Plan's failure to provide agreed solutions undermines its legal compliance and shows an absence of active engagement.

3.5. Case Law and Precedent

Several Inspectors have rejected Local Plans at examination due to failures under the Duty to Cooperate, including:

- **North Essex Authorities' Local Plan (2020)** – Inspector found the DtC unsatisfied because there was no joint strategy on transport infrastructure.
- **Wealden Local Plan (2020)** – Plan failed due to lack of cooperation on air quality impacts on Ashdown Forest SAC.
- **St Albans Local Plan (2019)** – Plan failed because of late-stage and ineffective engagement with neighbouring authorities.

Medway Council's current position is similar: **disjointed, reactive, and unsubstantiated cooperation efforts**, especially concerning:

- Infrastructure
 - Air quality
 - Biodiversity
 - Housing distribution
-

Conclusion: Chapter 3

The Medway Council Regulation 19 Draft Local Plan is legally unsound under Section 33A of the Planning Act 2004 because:

- **It has not engaged effectively, constructively, or on an ongoing basis** on strategic cross-boundary issues.

- **It lacks measurable outcomes** or agreements with relevant bodies.
- **It fails to resolve known infrastructure and environmental constraints**, especially on the Hoo Peninsula.
- **It conflicts with and ignores adopted neighbourhood plans**, which articulate specific infrastructure and environmental requirements unmet by the Local Plan.

Therefore, the draft Plan **fails the Duty to Cooperate test** and must not proceed to submission in its current form.

CHAPTER 4: THE UNSOUNDNESS OF THE SPATIAL DEVELOPMENT STRATEGY

This chapter scrutinises the Spatial Development Strategy outlined in **Chapter 3** of the Medway Council Regulation 19 Draft Local Plan (June 2025), and makes the case that the strategy is:

- **Not justified**, due to an absence of credible alternatives tested through the Sustainability Appraisal (SA)
- **Not effective**, because it relies on unviable infrastructure delivery and contradicts community planning objectives
- **Not positively prepared**, as it imposes disproportionate growth on the Hoo Peninsula, contrary to locally evidenced constraints
- **Not consistent with national policy**, particularly the December 2024 NPPF and two adopted Neighbourhood Plans

These failings render the Spatial Strategy **unsound** under Paragraph 36 of the NPPF.

4.1. Summary of the Draft Plan's Spatial Development Strategy

The strategy seeks to accommodate 24,540 dwellings across the Medway Council area to 2041, including:

- Major allocations on the **Hoo Peninsula**, including:
 - Hoo St Werburgh and Chattenden (14.9 in the Plan)
 - High Halstow (14.10 in the Plan)
 - Frindsbury Peninsula, and other rural settlements

It claims to balance brownfield regeneration with greenfield release, while citing constraints such as flood risk, protected habitats, and transport limitations.

However, the Plan's growth is:

- **Overconcentrated on a rural peninsula**
 - **Underpinned by unrealistic assumptions on infrastructure delivery**
 - **Not supported by environmental or community evidence**
-

4.2. Strategic Allocation of Growth to the Hoo Peninsula: An Unjustified Decision

a. Lack of Evidence Supporting Strategic Growth

The Plan allocates a significant share of its housing requirement to the Hoo Peninsula, yet:

- A comprehensive, deliverable transport strategy for the area is absent
- Water, sewerage, and education provision have known capacity deficits
- No cross-boundary cooperation has secured delivery of required infrastructure

This contradicts:

- **Paragraph 36(b) of the NPPF**, which requires a Plan to be the most appropriate strategy based on proportionate evidence
- **HOO4 and HOO11 of the Hoo St Werburgh & Chattenden Neighbourhood Plan**, which support only small-scale growth within infrastructural limits

b. Sustainability Appraisal Fails to Justify Preferred Strategy

The SA accompanying the Plan:

- Does not demonstrate fair and equal testing of strategic alternatives
- Fails to explain the dismissal of a maximised vacant “brownfield-led” approach centred within the urban/suburban Medway Towns
- Does not show how cumulative impacts on the Hoo Peninsula were determinative in site selection

This renders the strategy legally and procedurally deficient per *Heard v Broadland (2012)* and *Save Stonehenge WHS Ltd v SoS (2021)*.

4.3. Internal Contradictions in the Plan’s Vision and Spatial Approach

a. Inconsistency Between Vision and Allocations

The Plan’s vision commits to:

- Resilient, healthy communities
- Net zero emissions
- Infrastructure-led development

Yet the Hoo Peninsula allocations:

- **Are not supported by fully costed and funded transport improvements**
- **Worsen air quality in SPAs**
- **Rely on car-dependent development** (no rail service exists)
- **Lack accessible health and educational facilities** for incoming populations

This violates the internal logic of the Plan and **undermines its own strategic objectives (Section 2.2)**.

4.4. The Strategy Undermines Adopted Neighbourhood Plans

Hoo St Werburgh and Chattenden Neighbourhood Plan (2024)

The Plan:

- Repeatedly emphasises the unsuitability of further strategic growth on the peninsula without secured infrastructure
- Identifies community concerns around air quality, overdevelopment, and loss of rural character
- Supports modest, infrastructure-led housing growth

Yet the Local Plan directly contradicts this vision by:

- Allocating over 5,000 dwellings within Hoo St Werburgh and Chattenden alone
- Failing to phase development based on infrastructure delivery milestones
- Ignoring the Neighbourhood Plan's evidence base, which shows unsustainable transport conditions and protected natural assets

This is inconsistent with:

- **NPPF Paragraph 13**, which requires that Local Plans reflect Neighbourhood Plans
- **Planning legislation (Section 38(5) of the Planning and Compulsory Purchase Act 2004)**, which grants precedence to the most recently adopted development plan (in this case, the 2024 Hoo St Werburgh & Chattenden Neighbourhood Plan)

The spatial strategy's reliance on Hoo Peninsula growth is a **direct violation of the community-led evidence and policy framework**.

4.5. Environmental Constraints and National Policy Conflict

a. Violation of Paragraphs 187–195 of the NPPF (2024)

These paragraphs require plans to:

- Avoid significant harm to biodiversity
- Avoid development that adversely affects SPAs and SSSIs
- Safeguard irreplaceable habitats unless “wholly exceptional”

Yet the Hoo Peninsula's growth strategy:

- **Encroaches on and impacts multiple SPAs and SSSIs**
- Risks adverse air quality and recreational pressure impacts on the North Kent Marshes SPA
- Includes sites bordering or containing ancient woodland, saltmarsh, and high-grade farmland

No compelling case has been made under NPPF Paragraph 195 to justify this harm.

b. Contravention of National Transport Policy

The spatial strategy relies on strategic allocations in **the most poorly connected part of the Medway Towns and rural villages**, contrary to:

- **Paragraph 109, 110 and 111 of the NPPF**, which requires development to be focused on locations that are or can be made sustainable by public transport
- **Policy HOO11** of the Hoo St Werburgh & Chattenden Neighbourhood Plan, which mandates infrastructure before large-scale growth

4.6. Lack of Deliverability and Effectiveness

a. Transport Mitigation Not Secured or Costed

The Infrastructure Delivery Plan (IDP) identifies the need for:

- Road improvements (e.g. particularly along the A228)
- New junctions and roundabouts
- Public transport options

But:

- No committed funding from National Highways or central government exists
- No agreement with transport authorities or delivery agencies has been secured

This renders the strategy **undeliverable and ineffective**, breaching NPPF Paragraph 36(c).

b. Air Quality Mitigation Undermined by Delays in HRA

The “interim” HRA fails to demonstrate that growth on the Hoo Peninsula will not cause adverse effects on European Sites. The Local Plan therefore:

- **Cannot be lawfully submitted** until a full HRA is completed and published
- **Cannot demonstrate effectiveness** in mitigating environmental harm

4.7. Summary of Unsoundness: Spatial Strategy

Test of Soundness	Result
Justified	✗ Not the most appropriate strategy given vacant brownfield and urban/suburban alternatives and Hoo Peninsula ecological constraints
Effective	✗ Not deliverable within the plan period; infrastructure is unfunded and unsupported
Positively Prepared	✗ Ignores local evidence and community vision; imposes unsustainable development
Consistent with National Policy	✗ Conflicts with NPPF policies on climate change, biodiversity, infrastructure, and neighbourhood planning

Conclusion: Chapter 4

The Spatial Development Strategy is **unsound** because it:

- **Inappropriately concentrates growth** on the most environmentally and infrastructurally constrained part of the Medway Council area
- **Conflicts with legally adopted neighbourhood plans**
- **Relies on undeliverable mitigation and untested assumptions**
- **Contradicts national policy and best planning practice**

The allocations to the Hoo Peninsula must be removed from the Plan and a new spatial strategy adopted that prioritises:

- Maximised vacant brownfield-first development
- Urban regeneration
- Suburban growth
- Infrastructure-led growth
- Environmental protection

CHAPTER 5: ENVIRONMENTAL AND ECOLOGICAL NON-COMPLIANCE

This chapter assesses the Medway Council Regulation 19 Draft Local Plan (June 2025) against environmental legislation, national planning policy, and the evidence and policies of the two adopted neighbourhood plans. It demonstrates that the plan is not legally compliant or sound due to:

- Failure to comply with the **Conservation of Habitats and Species Regulations 2017 (as amended)**
- Conflict with the **Environment Act 2021**, particularly provisions on **biodiversity net gain (BNG)** and **Local Nature Recovery Strategies (LNRS)**
- Inconsistency with **Paragraphs 187–195 of the December 2024 NPPF**
- Fundamental **conflict with environmental policies** of the Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)

5.1. Legal Framework and National Policy Context

a. The Habitats Regulations (2017, as amended)

Under the **Habitats Regulations**, any plan likely to have a significant effect on a protected European site (SAC, SPA, RAMSAR) must undergo:

- **Screening**
- **Appropriate Assessment**
- **Conclusion of No Adverse Effect on Integrity (AEoI)**

This applies to development that increases population pressure, pollution, or loss of supporting habitat within the zones of influence of sites such as:

- **Medway Estuary and Marshes SPA**
- **Thames Estuary and Marshes SPA**
- **Chattenden Woods and Lodge Hill SSSI**

The Medway Council Plan fails this test.

b. NPPF 2024 Requirements (Paragraphs 187–195)

The NPPF requires that:

- Development should contribute to environmental enhancement
- Plans should protect sites of biodiversity value
- SSSIs and ancient woodland must be protected from significant harm
- Internationally designated habitats must be protected unless “wholly exceptional”

c. Environment Act 2021

The Local Plan:

- **Fails to demonstrate how the 10% biodiversity net gain (BNG) requirement** will be achieved and monitored
- Makes **no reference to Medway Council's role in the Kent-wide Local Nature Recovery Strategy**
- Overlooks the necessity of **Nature Recovery Networks** across the Hoo Peninsula

5.2. Failure of the Habitats Regulations Assessment (HRA)

The HRA published alongside the Draft Local Plan is labelled “**interim**”. It openly admits:

- **Air quality assessments are incomplete**
- **In-combination impacts are not resolved**
- **Recreational pressure on SPAs is not fully mitigated**

This violates:

- **Article 6(3) of the Habitats Directive**, which requires an HRA to be complete at the point of plan submission
- *People Over Wind v Coillte Teoranta* (2018, CJEU), which held that mitigation cannot be assumed at the screening stage

The “interim” status is **legally fatal**. The Plan cannot proceed without a full Appropriate Assessment and demonstrable AEOI conclusion.

5.3. Impact on Protected Sites on the Hoo Peninsula

The Hoo Peninsula hosts multiple protected sites at national and international levels:

Designation	Sites Affected by Allocations
SPA (Special Protection Area)	Medway Estuary and Marshes SPA, Thames Estuary and Marshes SPA
SSSI (Site of Special Scientific Interest)	Chattenden Woods and Lodge Hill, Northward Hill and Tower Hill to Cockham Wood
RAMSAR Wetlands	North Kent Marshes RAMSAR site
Ancient Woodland	Several areas near Chattenden, Hoo St Werburgh, High Halstow and St. Mary Hoo

Designation	Sites Affected by Allocations
Priority Habitats (NERC Act 2006)	Saltmarsh, grazing marsh, intertidal mudflat

These sites are:

- **Highly sensitive to nitrogen deposition and air pollution** from traffic (particularly around the A228, A289, and M2)
- **Vulnerable to recreational disturbance** from new residents, dogs, and footfall
- **Dependent on hydrological integrity**, which is at risk from increased abstraction and wastewater discharges

The Local Plan fails to present:

- Legally secured mitigation strategies
- Funded and enforceable access management plans
- Evidence that these sites will not be significantly harmed

5.4. Lack of Deliverable Mitigation (e.g. SAMMS)

The Strategic Access Management and Monitoring Strategy (SAMMS) is cited, yet:

- No detailed funding mechanism or delivery body is identified
- No evidence shows agreement with **Natural England** on quantum, timing or geographic coverage
- The plan's reliance on SAMMS is **generic** and **non-site specific**

This approach is inconsistent with:

- **NPPF 192, 193, 194 and 195**
- Recent case law (e.g. *Wealden v SoS [2020]*) demanding site-specific mitigation evidence

5.5. Agricultural Land Loss: Breach of Paragraph 180 of the NPPF

Medway Council's Spatial Strategy and Site Allocations place significant development on **Grade 1 and Grade 2 agricultural land** across:

- Hoo St Werburgh
- Chattenden
- High Halstow
- Kingsnorth

The loss of such land:

- Is **not justified** by exceptional circumstances
- Undermines **national food security** objectives (DEFRA 2024 guidance)
- Is directly opposed by neighbourhood plans: HOO8 and HOO9 of the Hoo St Werburgh & Chattenden NP

Paragraph 188 of the NPPF states:

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework - (65) Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”

This Plan ignores that instruction.

5.6. Contradiction with Neighbourhood Plan Policies on the Environment

Hoo St Werburgh & Chattenden Neighbourhood Plan

Policy	Conflict with Local Plan
HOO8 (Landscape & Environment)	Local Plan proposes major development within valued landscapes (Chattenden Valley) and near SSSI/SPA buffer zones
HOO9 (Local Green Space)	No protection for valued green spaces, no recognition of community-led designations
HOO10 (Air Quality)	Local Plan lacks mitigation; worsens vehicle emissions across sensitive receptor areas

The Local Plan’s environmental policies are **incompatible with the adopted development plan** as a whole and violate Section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.7. Air Quality and Climate Change Mitigation Failures

a. Air Quality

The Hoo Peninsula is constrained by:

- Poor road-based transport links
- High reliance on private vehicles
- Ecologically sensitive receptor areas

The Plan:

- Provides no air quality modelling for cumulative development
- Defers all mitigation to project-level assessment (unlawful at plan level under *Sweetman v An Bord Pleanála* CJEU)

b. Climate Change

The plan fails to:

- Deliver net zero-aligned growth
- Prioritise development in **well-connected urban and vacant brownfield or suburban locations**
- Secure modal shift or passive design standards in rural allocations

It contradicts its own **Climate Emergency Declaration (2019)** and its statutory obligation under the **Climate Change Act 2008 (as amended)**.

5.8. Summary of Environmental Unsoundness and Illegality

Requirement	Outcome
Habitats Regulations	✗ Not met – HRA is interim and incomplete
SEA Directive	✗ Not satisfied – SA fails to assess environmental constraints transparently
NPPF Paragraphs 187–195	✗ Conflicts with biodiversity, landscape and pollution mitigation policies
Environment Act 2021	✗ No clear BNG strategy or LNRS integration
Duty to Cooperate (Environment Agency, Natural England)	✗ Insufficient evidence of agreements on water, wastewater, or SPA management

Conclusion: Chapter 5

The Medway Council Regulation 19 Draft Local Plan:

- **Fails to protect internationally and nationally designated ecological sites**
- **Relies on interim and insufficient environmental evidence**
- **Ignores adopted neighbourhood plan policies on biodiversity, landscape and natural infrastructure**
- **Directly conflicts with national planning policy and statutory environmental duties**

The proposed allocations on the Hoo Peninsula represent **an unsustainable and unlawful expansion into some of southern England’s most sensitive and irreplaceable habitats.**

Until these conflicts are addressed - and the HRA completed in full - the Local Plan must not proceed to submission.

CHAPTER 6: INFRASTRUCTURE AND TRANSPORT CONSTRAINTS ON THE HOO PENINSULA

This chapter demonstrates that Medway Council’s Regulation 19 Draft Local Plan (June 2025) is unsound and legally non-compliant due to:

- The unsustainable concentration of growth on the **Hoo Peninsula**, which lacks adequate transport, water, foul drainage, education, health, and digital infrastructure
- The Plan’s failure to meet the tests of **deliverability, justification and effectiveness** in Paragraph 36 of the NPPF
- The clear **contradiction with the infrastructure assessments, priorities and evidence** in the **Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)**

These systemic constraints fundamentally undermine the Local Plan’s strategic approach.

6.1. Summary of Infrastructure Failures on the Hoo Peninsula

The Hoo Peninsula's infrastructure is inherently rural, fragmented, and under considerable strain. The Local Plan proposes strategic growth on a scale that:

- Outpaces available **road, public transport, and active travel infrastructure**
- Relies on **constrained and unreliable water supply and wastewater networks**
- Lacks confirmed delivery of **new primary and secondary schools**
- Fails to secure necessary **healthcare expansion**
- Offers **no secured delivery mechanism** for the essential road relief schemes

These issues are extensively documented in Medway Council's own evidence base (e.g. Infrastructure Delivery Plan, Transport Assessment), as well as through consultation responses and Neighbourhood Plan evidence.

6.2. Transport Infrastructure: Critical Failures

a. Road Network Limitations

The main road access to the Hoo Peninsula is via the **A228, B2000**, and minor local roads. These:

- Are largely **single-carriageway**, rural and over capacity during peak times
- Experience frequent congestion at **Four Elms Roundabout, Peninsula Way, and Wainscott bypass**
- Lack dedicated facilities for public transport priority, walking, or cycling

Medway Council's **Strategic Transport Assessment (STA)** admits these routes are:

“already operating near or over capacity” (STA, 2025)

The Plan proposes:

- Over **5,000 dwellings** on the Hoo Peninsula
- No fully costed or deliverable transport infrastructure
- **No binding commitment from National Highways or Homes England**

This renders the Plan's reliance on strategic Hoo Peninsula growth **undeliverable** and **unsound**.

b. No Rail Access, Limited Bus Services

Unlike other parts of the Medway Towns, the Hoo Peninsula:

- Has **no railway station**
- Is served by **limited, infrequent bus routes**, often requiring long journey times and multiple interchanges
- Is not aligned with planned **LCWIP (Local Cycling and Walking Infrastructure Plan)** priorities

This contradicts **Paragraph 110 of the NPPF**, which requires development to be directed to locations “which are or can be made sustainable.”

6.3. Water Supply and Wastewater Capacity

a. Severe Water Stress Designation

The peninsula lies within a zone classified by the **Environment Agency** as under “**serious water stress**”.

Southern Water, in consultation with Medway Council, previously advised that:

- **Water supply is fragile**, and new development will require significant investment in **Water Service Reservoirs**
- Strategic growth could lead to **supply interruptions or pressure loss**

b. Foul Drainage and Sewerage Constraints

Sewerage for Hoo St Werburgh, Chattenden, High Halstow and Kingsnorth is routed to the **Whitewall Creek Wastewater Treatment Works**, which:

- Already suffers from **sewage flooding**, as reported in community consultations
- Cannot accommodate large-scale growth without upgrades
- Has **no confirmed investment plan or costed expansion mechanism** in the IDP

This is echoed by residents’ reports of **blockages, overflows, and pumping failures**, which will only worsen with the scale of growth proposed.

6.4. Health and Education Infrastructure Deficits

a. Primary and Secondary Education

The Local Plan allocates sites for potential new schools but:

- Does not identify **funded, deliverable proposals**
- Lacks land safeguarded at appropriate locations and sizes
- Relies on **developer contributions**, but the Viability Assessment shows marginal viability on most sites

Local primary schools (e.g. Chattenden Primary School, St Werburgh Primary School and High Halstow Primary School) are already oversubscribed, and the area lacks a secondary school of sufficient capacity.

This breaches Paragraph 20, 27, 35, 96, and 111 of the NPPF.

b. Healthcare Provision

The Hoo Peninsula is served by **three GP practices**, which:

- Are already over capacity
- Have no confirmed expansion plans
- Will be unable to accommodate 15,000+ additional residents

No new GP or medical centres are committed within the Local Plan. Medway NHS Foundation Trust faces significant estate pressures, especially in primary and outpatient services.

The **Hoo St Werburgh & Chattenden Neighbourhood Plan (Section 2.2.2)** raised this issue as one of the most pressing local concerns, yet it has not been addressed in the Local Plan strategy or delivery framework.

6.5. Digital, Utilities and Broadband Constraints

Parts of the Hoo Peninsula (especially Cooling and St Mary Hoo):

- Lack full fibre broadband
- Rely on **3G/4G mobile networks with low coverage**
- Face **voltage constraints** in older electrical supply infrastructure
- Experience regular power cuts and blackouts

The Plan does not address digital or energy resilience for future-proof development - undermining the **net zero vision** and economic growth goals.

6.6. Contradiction with Infrastructure Evidence and Neighbourhood Plans

Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)

Policy/Section	Conflict
HOO11: Transport and Active Travel	Requires infrastructure first - Local Plan delivers housing ahead of road and public transport upgrades
Section 9: Infrastructure	Notes that current systems cannot support strategic growth - Local Plan offers no concrete solutions
Section 2.2.2: Key Concerns	Identifies education, health, and traffic pressure - all unresolved by the draft Plan

6.7. Viability and Delivery Failures in the Infrastructure Delivery Plan (IDP)

The IDP 2025:

- Lists £500M+ of necessary upgrades across the Hoo Peninsula
- Fails to confirm funding sources for:
 - Road improvements
 - New schools
 - Flood defences
 - Digital connectivity
- Admits **developer contributions are insufficient**, yet:
 - No Community Infrastructure Levy (CIL) or new strategic levy is in place
 - No Government capital funding is in place

Without confirmed delivery mechanisms, the Plan fails the **effectiveness** test in the NPPF.

6.8. Summary of Infrastructure Unsoundness

Infrastructure Type	Capacity to Support Growth?	Funding Secured?	Plan Compliant?
Road network	✗ Congested and inadequate	✗ No confirmed Hoo Peninsula transport funding	✗ NPPF Paragraph 110 breach
Public transport	✗ Infrequent, no rail	✗ No bus upgrades confirmed	✗ NPPF Paragraph 110 breach
Water supply	✗ Severe stress	✗ No business case for reservoir upgrades	✗ Environment Act breach
Wastewater	✗ Overloaded	✗ No expansion plan	✗ Habitats Regulations breach
Schools	✗ No places for projected demand	✗ No DfE or local funding commitment	✗ NPPF Paragraph 20, 27, 35, 96, and 111 breach
Health	✗ GP capacity exceeded	✗ No expansion proposals	✗ NPPF Paragraph 20, 27, 35, 96, and 111 breach
Broadband	✗ Patchy, substandard	✗ No digital infrastructure plan	✗ Digital connectivity strategy absent
Power/electricity	✗ Overloaded	✗ No power/electricity capacity plan	✗ NPPF Paragraph 20, 27, 35, 96, and 111 breach

Conclusion: Chapter 6

The Regulation 19 Draft Local Plan is fundamentally **unsound, unjustified and ineffective** because:

- It proposes **unsustainable levels of growth in an area with severe and unresolved infrastructure constraints**
- Its key delivery mechanisms are **unfunded, uncertain or deferred**
- It fails to align with the **statutory development plan**, including both Neighbourhood Plans
- It directly conflicts with **NPPF requirements** for plan-led infrastructure coordination, environmental limits, and sustainable accessibility

The Hoo Peninsula allocations must be removed or radically reduced until critical infrastructure - including transport, health, education, water and sewerage - is demonstrably deliverable.

CHAPTER 7: CONFLICT WITH NATIONAL POLICY AND THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

This chapter demonstrates that Medway Council's Regulation 19 Draft Local Plan (June 2025) is **not consistent with national planning policy** and fails to meet the **presumption in favour of sustainable development**, as required by:

- **Paragraphs 11–16 of the NPPF (December 2024)**
- **The Town and Country Planning Act 1990 (as amended)**
- **Section 39(2) of the Planning and Compulsory Purchase Act 2004**, which requires that “the purpose of planning is to contribute to the achievement of sustainable development”

As a result, the draft Local Plan is **unsound** under **NPPF Paragraph 36(d)** and should not proceed in its current form.

7.1. The Presumption in Favour of Sustainable Development (NPPF Paragraph 11)

Paragraph 11 of the NPPF requires that:

“a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas”

Furthermore, paragraph 11(b) states that sustainable development means:

- Aligning growth with infrastructure
- Avoiding environmental harm
- Respecting community-led policies and plans
- Safeguarding natural resources

Medway Council's draft Local Plan does not satisfy these criteria.

7.2. Failure to Deliver Truly Sustainable Development

a. Lack of Infrastructure-Led Growth

As demonstrated in Chapters 5 and 6, the Plan:

- Allocates growth in areas **without secured water, wastewater, health, or education infrastructure**
- Lacks a clear and costed phasing strategy to ensure **infrastructure precedes development**
- Relies on **hypothetical or unfunded mitigation**, including the Hoo Peninsula transport infrastructure and new schools/GP surgeries

This breaches **Paragraphs 8 and 20 of the NPPF**, which require plans to:

“to help build a strong, responsive and competitive economy... by identifying and coordinating the provision of infrastructure”

b. Environmental Sustainability Not Achieved

The Local Plan:

- Threatens the integrity of **SPA, RAMSAR, and SSSI sites**
- Fails to demonstrate compliance with the **Habitats Regulations (2017, as amended)**
- Makes no credible plan for **10% biodiversity net gain**, as required under the **Environment Act 2021**
- Allocates development to **Grade 1 agricultural land**, contrary to Paragraph 180(c) of the NPPF

This undermines the environmental pillar of sustainable development set out in **NPPF Paragraph 8(c)**.

c. Social Sustainability Also Compromised

The draft Plan:

- Fails to provide a **credible strategy for affordable housing delivery** (with viability testing revealing unviable sites across rural parts of the Medway Council area)
- Does not include confirmed expansion of **schools or health facilities**
- Conflicts with the **statutorily adopted Neighbourhood Plans**, which express local housing needs and infrastructure priorities

This means the Plan does not support “strong, vibrant and healthy communities” (NPPF, Paragraph 8(b)).

7.3. Incompatibility with the Plan-Led System (NPPF Paragraph 15)

Paragraph 15 of the NPPF requires that:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area... and a platform for local people to shape their surroundings.”

The Medway Council Draft Plan:

- Contradicts the **Hoo St Werburgh & Chattenden Neighbourhood Plan (2024)**
- Overrides community evidence about infrastructure capacity, environmental value, and development scale
- Offers **no mechanism for reconciling local concerns** with strategic policy

This undermines the plan-led approach and violates Paragraphs 13 and 15 of the NPPF.

7.4. Ignoring National Policy on Transport and Accessibility

The NPPF sets out clear principles for sustainable transport:

NPPF Paragraph	Requirement	Local Plan Compliance
Paragraph 110	Focus growth in sustainable, well-connected locations	✗ Hoo Peninsula is remote and inaccessible
Paragraph 111	Support active travel and public transport improvements	✗ No secured bus or rail enhancements
Paragraph 115	Assess cumulative transport impacts of	✗ No full cumulative impact assessment

NPPF Paragraph	Requirement	Local Plan Compliance
	allocations	provided

The Plan **ignores or undermines** these core transport policies.

7.5. Conflict with National Environmental Policy and Climate Strategy

a. Climate Change and Net Zero Obligations

Paragraph 162 of the NPPF requires that:

“Plans should take a proactive approach to mitigating and adapting to climate change... in line with the objectives of the Climate Change Act 2008.”

However:

- The Plan prioritises **car-dependent development**
- Offers **no low-carbon energy policy**
- Fails to **locate growth near jobs, transport or services**

This contradicts **the government’s legal obligation to meet net zero emissions by 2050**.

b. National Environmental Framework and LNRS

The Environment Act 2021 establishes:

- A **national framework for biodiversity net gain (BNG)**
- A requirement to align local plans with **Local Nature Recovery Strategies (LNRS)**

The Medway Council Draft Plan:

- Provides **no BNG mechanism** beyond policy statements
- Does not reference or align with the Kent-wide LNRS
- Lacks measurable targets or monitoring mechanisms

This renders the Plan **non-compliant** with the national environmental policy framework.

7.6. Disregard for Strategic Flood Risk Policy (NPPF Paragraphs 159–169)

A number of sites on the Hoo Peninsula (particularly near **Hoo St Werburgh, Chattenden and Kingsnorth**) lie:

- Within **Flood Zone 2 or 3**
- In areas identified for **coastal retreat or managed realignment**

The Plan fails to:

- Demonstrate compliance with the **Sequential Test**

- Offer adequate evidence that the **Exception Test** is passed
- Include **up-to-date SFRA Level 2** assessments for all affected sites

This breaches NPPF Paragraph 170, which requires that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”

7.7. Failure to Meet Housing Needs in a Sustainable Manner

Although the Plan identifies a housing requirement of 24,540 dwellings, it fails to:

- Allocate those homes where infrastructure, services, and vacant brownfield capacity exist (i.e. urban/suburban Medway Towns)
- Maintain flexibility to respond to demographic change, migration shifts, or infrastructure delays
- Deliver a **realistic trajectory** of housing delivery over the plan period

As a result, the Plan is not “positively prepared,” as defined by **NPPF Paragraph 35(a)**.

7.8. Summary: Incompatibility with the NPPF

NPPF Requirement	Compliance?	Reason for Non-Compliance
Paragraph 7–10 (Sustainable Development)	X	No infrastructure, environmental harm, poor location
Paragraph 11–14 (Presumption in Favour)	X	Fails to deliver sustainable, infrastructure-supported growth
Paragraph 15–23 (Plan-led system)	X	Conflicts with adopted Neighbourhood Plans
Paragraph 109–118 (Transport)	X	Poor access, no mitigation, high car dependency
Paragraphs 187–195 (Biodiversity and Natural Environment)	X	Harm to protected sites, incomplete HRA
Paragraph 161-169 (Climate Change)	X	No net zero trajectory, car-centric development
Paragraphs 170–182 (Flood Risk)	X	Allocations in high-risk flood zones without sequential justification

Conclusion: Chapter 7

The Regulation 19 Draft Local Plan:

- **Conflicts with core principles of the NPPF**, including sustainable development, environmental protection, plan-led growth, and net zero obligations
- **Fails to meet national policy tests** on transport, biodiversity, infrastructure, climate, housing, and community-led planning
- Cannot be made sound through minor modification, due to the **systemic nature of its conflicts with national policy**

Accordingly, the Plan must be withdrawn or fundamentally restructured. A new spatial strategy - based on maximised vacant brownfield-first growth, environmental capacity, and compliance with adopted or emerging Neighbourhood Plans - must be developed.

CHAPTER 8: SUMMARY OF FAILURES, RECOMMENDATIONS, AND REQUESTED ACTIONS

This final chapter summarises the findings of this representation and sets out clear recommendations for the Planning Inspector and Medway Council. The Regulation 19 Draft Local Plan (June 2025) is legally non-compliant, demonstrably unsound, and procedurally flawed. As such, it should not proceed to submission without significant revision and reconsultation.

8.1. Summary of Legal Failures

Legal Duty	Failure Identified
Duty to Cooperate (s.33A PCPA 2004)	No effective, outcome-based engagement with statutory bodies or neighbouring LPAs on cross-boundary matters (see Chapter 3)
Habitats Regulations 2017 (as amended)	Interim HRA is incomplete, in-combination effects not assessed, no agreed mitigation (see Chapters 5 & 7)
Strategic Environmental Assessment Directive (2001/42/EC)	Sustainability Appraisal fails to transparently test reasonable alternatives or assess environmental harm (see Chapter 5)
Planning and Compulsory Purchase Act 2004 (s.19 & s.39)	Strategy not sustainable, does not contribute to the achievement of sustainable development (see Chapters 6 & 7)
Planning and Neighbourhood Plan Conflict (s.38(5) PCPA 2004)	Direct conflict with two adopted Neighbourhood Plans; no explanation or justification provided (see throughout)

These legal failings render the plan unfit for examination under **Section 20 of the PCPA 2004**.

8.2. Summary of Unsoundness Against the NPPF (December 2024)

The draft Local Plan **fails all four tests of soundness** as set out in **Paragraph 36 of the NPPF**:

Test	Assessment	Summary
Positively Prepared	✗	Plan is not based on a strategy that meets needs sustainably; growth on Hoo Peninsula exceeds infrastructure and environmental capacity
Justified	✗	No reasonable alternatives assessed; rural, ecologically constrained sites chosen over maximised vacant brownfield urban land
Effective	✗	Infrastructure undeliverable; no clear phasing, viability, or cooperation mechanisms in place
Consistent with National Policy	✗	Conflicts with NPPF policies on sustainability, biodiversity, climate change, flood risk, and plan-making

The scale of conflict is systemic. No Inspector could make the Plan sound through minor modifications.

8.3. Summary of Key Site-Level and Strategic Failures

- **The Hoo Peninsula allocations (Policies 14.9, 14.10, 14.12, 14.13 and 14.14)** are undeliverable, environmentally damaging, and directly opposed by adopted Neighbourhood Plans
 - The **spatial strategy** is regressive, car-dependent, and inconsistent with net zero goals and sustainable development principles
 - There is **no credible infrastructure strategy** to support the proposed scale of growth, with major gaps in transport, education, health, water, sewerage, and digital infrastructure
 - **Flood risk, SPA impacts, and loss of Grade 1 farmland** have not been avoided or adequately mitigated
 - The Plan does not incorporate a functioning mechanism for **Duty to Cooperate** or cross-boundary strategic planning, especially around air quality and transport
-

8.4. Contradiction with Neighbourhood Plans

Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)

- Strongly opposes large-scale strategic growth without pre-committed infrastructure
- Protects habitats, green spaces, and village identity
- Requires developer-led infrastructure contributions and environmental mitigation
- Endorsed by local referendum, but **ignored** in the Local Plan

Medway Council's Local Plan **fails the NPPF Paragraph 48** requirement to “have regard to the development plan unless material considerations indicate otherwise.”

8.5. Recommendations to the Planning Inspector and Medway Council

a. Immediate Actions

- **Suspend progression of the Local Plan** pending:
 - Completion of a full and legally compliant Habitats Regulations Assessment
 - Preparation of a legally robust Sustainability Appraisal with reasonable spatial alternatives
 - Production of outcome-based Statements of Common Ground with affected neighbouring authorities and statutory consultees
- **Withdraw the current spatial strategy** for review
- **Respect and reflect adopted Neighbourhood Plans**, per Paragraph 30 of the NPPF

b. Medium-Term Strategy Revisions

- Reassess housing growth options focusing on:
 - **Maximising urban vacant brownfield or suburban land first** (consistent with Paragraphs 124–128 of the NPPF)
 - **Avoidance of designated ecological and high-quality agricultural land**

➤ **Phased growth linked to real-world infrastructure delivery**

- Prioritise **infrastructure-first, nature-positive development**, supported by clear funding, phasing, and cooperation strategies
 - Integrate outcomes from the **Kent Local Nature Recovery Strategy, Catchment Area Management Plans**, and **Strategic Infrastructure Studies**
-

8.6. Requested Inspector Actions at Examination

- Declare the Plan **not legally compliant and unsound**
 - Recommend its **withdrawal and revision**, as per **PINS Procedure Guide for Local Plan Examinations (2023)**, section 5.21
 - Require a new draft Plan to be produced that:
 - Fully complies with the **NPPF (2024)**
 - Is aligned with **neighbourhood planning policies**
 - Addresses cross-boundary infrastructure, climate, environmental and housing delivery issues
-

Concluding Statement

The Medway Council Regulation 19 Draft Local Plan (June 2025) represents a **regressive, unsustainable, and procedurally unlawful approach** to plan-making. It fails to safeguard the environmental assets, rural character, and community infrastructure of the Hoo Peninsula. It contradicts the spatial vision and statutory policy of two democratically endorsed Neighbourhood Plans and fails to comply with national planning policy and environmental law.

A new, legally compliant, sound and environmentally sustainable Local Plan is required.

Thank you for taking the time to read this representation.



THE ALLIANCE OF
**Hoo Peninsula
Parishes**

Organisation:	Signatory:	Signature:
Allhallows Action Group	Mrs Louise Putnam (Treasurer)	
Cooling Parish Council	Cllr. Kevin Boyle (Chairman)	
Frindsbury Extra Parish Council	Cllr. Chris Sparks (Chairman)	
High Halstow Parish Council	Cllr. Matt Wenham (Chairman)	
Higham Parish Council	Cllr. John Grey (Chairman)	
Hoo St Werburgh & Chattenden Parish Council	Cllr. Ron Sands (Chairman)	
St James, Isle of Grain Parish Council	Cllr. Paul Blakeley (Chairman)	
St Mary Hoo Parish Council	Cllr. Nick Craddy (Chairman)	
Stoke Parish Council	Cllr. Julie Wallace (Chairman)	

From: [REDACTED]
To: [policy_planning](#)
Subject: Medway local plan 2041 regulation 19
Date: 11 August 2025 19:44:54

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Good evening Sir / Madam,

Medway local plan 2041 regulation 19

Higham parish council would like to strongly oppose the above proposal.

Higham parish council's comments can be found in the representation from the alliance of hoo peninsula

The council hopes that you will take our comments into consideration

Many thanks

Kind Regards

Rachael Martin

*Parish Clerk & Responsible Financial Officer
Higham Parish Council*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Please note my working hours are Monday, Tuesday, Wednesday and Friday 11am - 4pm.

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From: [REDACTED]
To: [policy_planning](#)
Subject: Objection to Draft Local Plan for Medway Reg 19
Date: 11 August 2025 12:33:09

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Dear Sir or Madam,

Representation on behalf of the Friends of Deangate Ridge Country Park Committee

Please accept this as a representation on behalf of the Friends of Deangate Ridge Country Park Committee in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass on our representation to the Independent Planning Inspector when the plan is submitted for examination.

The Local Plan is not legally compliant for the following reasons:

- The Local Plan fails the Duty to Cooperate (section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paragraphs 24-28.
- Medway has failed to comply with Regulation 18 and 19 requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at the Regulation 18 consultation stages and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Medway Council is actively preparing and revising evidence and planning documents which support the Regulation 19 version of the draft plan, but have refused to extend the consultation period. Residents and other interested parties are therefore unable to comment on this evidence and these documents. This is procedurally defective.
- If the plan is considered to be non-legally compliant, the plan therefore fails and/or the Council may be asked to withdraw it from examination by the Inspector. No amount of further work at this late stage can rectify its non-compliance. However, should that not be the case, we have written our objections to the plan below as it is not sound.

The Local Plan is not sound

Should the Local Plan be considered at examination, or before, to have conformed to all of the legal requirements, the plan is unsound for the following reasons:-

- The Local Plan does not conform with the NPPF (December 2024). Numerous policies do not align with legal obligations of the NPPF including sustainable development (paragraph 11), plan-making (paragraphs 15-36), and the treatment of Neighbourhood Plans (paragraphs 30-31). The draft Plan ignores many brownfield sites and favours greenfield development which is against Government policy on sustainability. The number of homes proposed in the Plan for the Hoo Peninsula is unattainable. The impacts of these homes on transport, education, health, drainage, water and infrastructure are all unmitigated and therefore the plan fails to adhere to

national policy.

- The Plan does not conform with the Hoo St Werburgh and Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities and housing. Medway do not provide any explanation as to why they are not co-operating with local Neighbourhood Plans.
- There is insufficient integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle. The number of homes proposed in the Plan for the Hoo Peninsula is unsustainable. The impacts of these homes on the environment will be devastating and contrary to Government policy. There is no evidence in the Plan of the 400 metre buffer zones being applied to development in areas that border protected sites such as Special Protection Areas, SSSIs and the RAMSAR site. Deangate Ridge Country Park adjoins an SSSI, designated largely due to its nationally significant Nightingale population, and this issue is particularly worrying to the Friends of Deangate Ridge Committee.
- There is lack of evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF paragraph 35.
- The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and environmentally sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife – following the avoid, mitigate and compensate hierarchy.

Regards,

Louise Putnam

Secretary

Friends of Deangate Ridge Committee



Department for Levelling Up,
Housing & Communities

Duncan Parr
Rapleys
33 Jermyn Street
London
SW1Y 6DN

Our ref: APP/A2280/W/20/3259868
Your ref: MC/19/1566

3 November 2021

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEAL MADE BY A C GOATHAM & SON
LAND OFF PUMP LANE, RAINHAM, KENT
APPLICATION REF: MC/19/1566**

1. I am directed by the Secretary of State to say that consideration has been given to the report of Mrs JA Vyse DipTP DipPBM MRTPI, who held a public local inquiry on 15-18 and 22-23 February, 1-3 and 5 March, 19-23 and 28 April 2021 into your client's appeal against the decision of Medway Council to refuse your client's application for planning permission for redevelopment of land off Pump Lane to include residential development comprising up to 1,250 residential units, a local centre (with final uses to be determined at a later stage) a village green, a two form entry primary school, a 60 bed extra care facility, an 80 bed care home and associated access (vehicular, pedestrian, cycle), in accordance with application No MC/19/1566, dated 3 June 2019.
2. On 17 November 2020, this appeal was recovered for the Secretary of State's determination, in pursuance of section 79 of, and paragraph 3 of Schedule 6 to, the Town and Country Planning Act 1990.

Inspector's recommendation and summary of the decision

3. The Inspector recommended that the appeal be dismissed.
4. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with her recommendation. He has decided to dismiss the appeal. A copy of the Inspector's report (IR) is enclosed. All references to paragraph numbers, unless otherwise stated, are to that report.

Environmental Statement

5. In reaching this position, the Secretary of State has taken into account the Environmental Statement which was submitted under the Town and Country Planning (Environmental

Department for Levelling Up, Housing and Communities Mike
Hale, Decision Officer
Planning Casework Unit 3rd
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Impact Assessment) Regulations 2017. Having taken account of the Inspector's comments at IR1.9-1.10, the Secretary of State is satisfied that the Environmental Statement complies with the above Regulations and that sufficient information has been provided for him to assess the environmental impact of the proposal.

Matters arising since the close of the inquiry

6. On 20 July 2021 a revised National Planning Policy Framework (the Framework) came into force. However, as the changes do not affect the main issues in this inquiry, the Secretary of State does not consider that the revised Framework raises any matters that would require him to refer back to the parties for further representations prior to reaching his decision on this appeal, and he is satisfied that no interests have thereby been prejudiced.
7. On 15, 22 and 29 October 2021, you, on behalf of your client, shared additional information with the Secretary of State in relation to the emerging Local Plan timetable, which they viewed as relevant to his decision. The Secretary of State has given consideration to this additional information, though does not consider that it represents a material change in circumstances such that a referral back to parties would be necessary. The information is included at Annex A of this decision letter. Copies of all representations received may be obtained on request to the email address at the foot of the first page of this letter.

Procedural matters

8. An application for a partial award of costs was made by Medway Council against the Appellant (IR1.1). This application is the subject of a separate decision letter.

Policy and statutory considerations

9. In reaching his decision, the Secretary of State has had regard to section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
10. In this case the development plan consists of saved policies of the Medway Local Plan (2003). The Secretary of State considers that relevant development plan policies include those set out at IR4.2-IR4.29. He notes that the Local Plan is of a considerable age, and agrees with the Inspector's assessment at IR12.226-12.237 about the extent to which development plan policies are in accordance with the Framework. He has taken this assessment into account when reaching his conclusions on this case.
11. Other material considerations which the Secretary of State has taken into account in addition to the National Planning Policy Framework ('the Framework') and associated planning guidance ('the Guidance'), include the relevant documents and guidance set out at IR4.32-IR4.35. For clarity, the Framework references within this letter have been amended from those in the IR to reflect the revised Framework paragraph numbering where necessary.
12. In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCA Act), the Secretary of State has paid special regard to the desirability of preserving those listed buildings potentially affected by the proposals, or their settings or any features of special architectural or historic interest which they may possess.

Emerging plan

13. The emerging plan comprises a new Local Plan covering the period to 2037. The Secretary of State notes that at the time of the Inquiry, the emerging plan was proposed to cover the period to 2035.
14. Paragraph 48 of the Framework states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework. The Secretary of State notes that preparation of the new Local Plan is still at an early stage. He notes that as of September 2021 Regulation 18 consultation on the new Local Plan has been undertaken but Regulation 19 consultation has not yet been undertaken. Consequently, a full draft plan has not yet been published, meaning there has not yet been an opportunity to consult on draft policies.
15. For the reasons given at IR4.36, the Secretary of State agrees with the Inspector with regard to the emerging new Local Plan that in light of its early stage, no weight is afforded to it.

Main issues

16. For the reasons given at IR12.2, IR12.196 and at paragraph 1.1 of IR Appendix E, the Secretary of State agrees that the main issues are those set out by the Inspector at IR12.2.

Character and appearance of the surrounding area

17. The Secretary of State agrees with the Inspector at IR12.3 that the appeal site is located outside any settlement boundary as shown of the Local Plan Proposals Map and lies within open countryside for planning policy purposes. He also notes that the site also forms a significant part of the Gillingham Riverside Area of Local Landscape Importance (ALLI) as defined by Local Plan policy BNE34 (IR12.4), is a valued landscape in Framework terms (IR12.5) and that it is a matter of agreement between the parties that the development proposed would give rise to adverse landscape and visual effects (IR12.6).
18. The Secretary of State agrees with the Inspector's analysis of landscape context at IR12.7-IR12.19, of visual context at IR12.20-IR12.21, of landscape effects at IR12.22-IR12.36, of visual effects at IR12.37-IR12.53, and of the Gillingham Riverside ALLI at IR12.54-IR12.68.
19. For the reasons given there, the Secretary of State agrees with the Inspector that overall, the appeal scheme would have a substantial adverse landscape and visual impact, with corresponding harm to the character and appearance of a wide swathe of countryside between Lower Rainham Road and Twydall/Rainham. Like the Inspector, he considers that the degree of harm would be significant and has come to this view having had regard to the status of the site, lying as it does within a valued landscape as recognised by its designation as an ALLI in the Local Plan and the harm that would be a consequence not only to its landscape importance, but also to its functions, particularly that as a green buffer (all at IR12.69).
20. The Secretary of State agrees that those conclusions bring the development into conflict with policy S1, policy BNE25, policy BN34, policy BNE47 and paragraphs 174a) and b) of

the Framework (IR12.70). The Secretary of State considers that this harm attracts substantial weight against the proposal.

Heritage assets

21. The Secretary of State agrees with the Inspector's analysis of heritage impacts at IR12.72-IR12.133 and IR12.217-12.220. For the reasons given there, the Secretary of State agrees with the Inspector's assessment of harms at IR12.131 that there would be no harm to the heritage significance of York farmhouse, or the listed outbuildings within the Bloors Place complex. He further agrees with the Inspector's conclusion at IR12.131 that the harm to Pump farmhouse, Bloors Place, the listed walls and Lower Twydall Conservation Area would be at the lower end of the less than substantial range, with the harm to Chapel House and Lower Rainham Conservation Area in the middle of the spectrum. He further agrees that there is very limited/minor harm to the non-designated asset that is the Oasts.
22. For the reasons given at IR12.127-IR12.130, the Secretary of State agrees that the historic landscape does not here merit treating as a non-designated heritage asset (IR12.132). He further agrees with the approach taken by the Inspector in IR12.219.
23. The Secretary of State agrees with the Inspector at IR12.219 that the heritage harms should be given considerable importance and weight. He further agrees with the Inspector that would be conflict with policies BNE14 and BNE18 (IR12.133). He agrees that Paragraph 202 of the Framework requires such harms to be weighed against the public benefits of the scheme and Paragraph 203 of the Framework requires to harm to the non-designated asset to be taken into account (IR133). This balancing exercise is undertaken below at paragraph 49.

Agricultural land

24. The Secretary of State notes that around 96% of land at the appeal site is classified as either Grade 1 (excellent quality) or Grade 2 (very good quality), with the remainder comprising Grade 3a (good to moderate quality) (IR12.135) and that there are no current development plan policies relating to agricultural land and so national policy and guidance form the principal consideration (IR12.136).
25. For the reasons given at IR12.137-IR12.154 the Secretary of State agrees with the Inspector that on the evidence before him, there is a good prospect for the land to be farmed in such a way that it realises a reasonable profit (IR12.153).
26. The Secretary of State has considered the Inspector's analysis at IR12.222-IR12.225 and IR12.235 regarding the extent of BMV land in the District and the availability of non-BMV land in the District. While he notes that there is no requirement in the Framework for a formal agricultural land balance to be carried out, for the reasons given, he agrees that there is at least the possibility of locating strategic development, such as that proposed here, on land that whilst comprising BMV is potentially of poorer quality/usefulness than that of the appeal site, albeit that that may be some years off if it was to be delivered as part of that emerging Plan (IR12.223).
27. Overall, the Secretary of State agrees that the loss of this significant area of BMV land, and the orchards, would have a negative effect on the provision of such land in terms of economic and other benefits, bringing it into conflict with paragraph 174b) of the

Framework (IR12.224). He further agrees with the Inspector that this harm attracts moderate weight (IR12.235).

Highways

28. For the reasons given at IR12.155-12.160, the Secretary of State agrees with the approach taken by the Inspector, namely that it is appropriate to focus on the areas of greatest potential traffic impact in order to assess the scheme against the relevant policies (IR12.158). The Secretary of State agrees with the Inspector at IR12.161 that the local highway network, including key arterial routes, is already heavily congested, particularly during the AM and PM peaks. He notes that the Appellant has proposed a number of mitigation works, identified at IR12.161, as amended during the Inquiry, to which he has given consideration.
29. The Secretary of State notes that there were two competing appraisals before the Inquiry that deal with traffic impacts (IR12.162) and that the results of each assessment are significantly different (IR12.165). For the reasons given at IR12.162-IR12.172 and IR191, the Secretary of State agrees with the Inspector at IR12.191 that in terms of the highway modelling evidence, on balance, the outputs of the Council's more holistic Medway Aimsun Model (MAM) approach (which models the interaction between junctions, links and journey times) are to be preferred over the Appellant's isolated junction modelling approach.
30. For the reasons given at IR12.173-IR12.178 and at IR12.192 the Secretary of State agrees with the Inspector that the residual cumulative impacts on subnetwork 2 would be severe, particularly during the AM and PM peaks (IR12.192). Like the Inspector, the Secretary of State recognises that those impacts are largely confined to peak hours and that the subnetwork forms only a part of the wider network. However, the Secretary of State also agrees with the Inspector that that does not mean that the impacts cannot be considered as severe in their context (all at IR12.192).
31. Overall on highway matters, the Secretary of State agrees with the Inspector that the appeal scheme would have a severe residual cumulative impact on the local highway network and that there would be conflict in this regard with Local Plan policy T1 and paragraphs 110 and 111 of the Framework (IR12.192). The Secretary of State considers this harm attracts substantial weight against the appeal scheme.
32. For the reasons given at IR12.189, he agrees with the Inspector's finding of no harm in terms of highway safety (IR12.190). He further agrees with the Inspector's conclusions at IR12.93.

Benefits

33. The Secretary of State notes that the housing land supply range identified by the parties is between 1.78-3.03 year, and that whichever figure is used, the parties are agreed that as a minimum, the shortfall is significant. The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of

that, the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight.

34. The Secretary of State agrees with the Inspector at IR12.203 that the development would contribute to employment provision and that future residents would also contribute to the economy through local expenditure. For the reasons given at IR12.203, the Secretary of State agrees that the weight to be given to employment provision is substantial.
35. For the reasons given at IR12.204, the Secretary of State agrees that the development would result in significant improvements in terms of ecology and biodiversity. Like the Inspector, he considers that the benefits secured in this regard attract substantial weight.
36. For the reasons given at IR12.205-IR12.206 the Secretary of State agrees with the Inspector at IR12.206 that signalisation of the section of restricted carriageway beneath the railway at the southern end of Pump Lane is a benefit which attracts only limited weight in favour.
37. For the reasons given at IR12.207-208, he agrees that opening up pedestrian access to the site from the southern end of Lower Twydall Lane and financial contributions towards bridleway improvements attract limited weight. For the reasons given at IR12.209 he further agrees that the planning obligation which includes a contribution towards interim assistance to support bus service provision is a consideration that attracts moderate weight.
38. With regard to the school proposed on the site, for the reasons given at IR12.211 the Secretary of State agrees that its provision attracts limited weight. For the reasons given at IR12.211 the Secretary of State also agrees that provision of the two care facilities attracts limited weight.
39. The Secretary of State further agrees with the Inspector's conclusions with regards to matters at IR12.200, IR12.210, IR12.212, IR12.213 and IR12.214 for the reasons given there.

Other matters

40. The Secretary of State notes that the Medway Estuary and Marshes Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI), a European Protected site, lies approximately 250m to the north of the appeal site (IR12.195). For the reasons given at IR12.196, he agrees that ecological impact is not a main consideration.
41. For the reasons given at IR12.197 the Secretary of State agrees that an Appropriate Assessment under the terms of the Conservation of Habitats and Species Regulations 2017 (as amended) is required should the appeal be allowed.
42. The Secretary of State is the Competent Authority for the purposes of the Conservation of Habitats and Species Regulations 2017. The Secretary of State agrees with the assessment and findings in Annex E of the IR. However, he does not consider that carrying out an Appropriate Assessment would overcome his reasons for dismissing this appeal, and has therefore not proceeded to make an Appropriate Assessment in his role as the Competent Authority on this matter.

Planning conditions

43. The Secretary of State has given consideration to the Inspector's analysis at IR10.1-IR10.20, the recommended conditions set out at the end of the IR and the reasons for them, and to national policy in paragraph 56 of the Framework and the relevant Guidance. He is satisfied that the conditions recommended by the Inspector comply with the policy test set out at paragraph 56 of the Framework. However, he does not consider that the imposition of these conditions would overcome his reasons for dismissing this appeal and refusing planning permission.

Planning obligations

44. Having had regard to the Inspector's analysis at IR11.1-IR11.4, the planning obligation dated 14 May 2021, paragraph 57 of the Framework, the Guidance and the Community Infrastructure Levy Regulations 2010, as amended, the Secretary of State agrees with the Inspector's conclusion for the reasons given in IR11.4 that the obligation complies with Regulation 122 of the CIL Regulations and the tests at paragraph 57 of the Framework. However, the Secretary of State does not consider that the obligation overcomes his reasons for dismissing this appeal and refusing planning permission.

Planning balance and overall conclusion

45. For the reasons given above, the Secretary of State considers that the appeal scheme is not in accordance with development plan Policies T1, BNE14, BNE34 and BNE47, BNE18 and BNE25, and considers that overall, the proposal is not in accordance with the development plan. He has gone on to consider whether there are material considerations which indicate that the proposal should be determined other than in accordance with the development plan.

46. As Medway Council is unable to demonstrate a five year supply of housing land, paragraph 11(d) of the Framework indicates that planning permission should be granted unless: (i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or (ii) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole.

47. Weighing in favour of the proposal are the delivery of housing in the light of housing supply shortfall, and the delivery of affordable housing, biodiversity improvements and employment provision. Each carries substantial weight. Public transport improvements attract moderate weight, while highways improvements, improvements to pedestrian access and contributions toward bridleway works, and the benefits arising from the school and care facilities each attract limited weight.

48. Weighing against the proposal are significant landscape harm which attracts substantial weight, and severe residual impacts on the local road network which also attract substantial weight. Loss of BMV land attracts moderate weight. In line with statute and policy, the 'less than substantial' heritage harms attract considerable weight in the planning balance.

49. Paragraph 202 of the Framework requires heritage harm to be weighed against the public benefits of the scheme. The Secretary of State agrees with the Inspector for the reasons given at IR12.217-12.220 that the very substantial benefits of the appeal scheme are sufficient to outweigh the identified heritage harm both individually and collectively (IR12.220). He considers that the balancing exercise under paragraph 202 of the Framework is therefore favourable to the proposal.

50. Consequently, under limb (i) of the test at Framework paragraph 11(d) the Secretary of State considers that there are no protective policies which provide a clear reason for refusing the development proposed. However, for the reasons given in this decision letter the Secretary of State considers that limb (ii) of the 11(d) test is met, i.e. the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole. The presumption in favour of sustainable development is therefore disapplied.
51. The Secretary of State takes the age of the Local Plan and the significant shortfall in housing land supply very seriously. However, on the particular facts of this case, he considers that the material considerations indicate a decision in line with the development plan – i.e. a refusal of permission.
52. The Secretary of State therefore concludes that the appeal should be dismissed.

Formal decision

53. Accordingly, for the reasons given above, the Secretary of State agrees with the Inspector's recommendation. He hereby dismisses your client's appeal and refuses planning permission for redevelopment of land off Pump Lane to include residential development comprising up to 1,250 residential units, a local centre (with final uses to be determined at a later stage) a village green, a two form entry primary school, a 60 bed extra care facility, an 80 bed care home and associated access (vehicular, pedestrian, cycle), in accordance with application No MC/19/1566, dated 3 June 2019.

Right to challenge the decision

54. A separate note is attached setting out the circumstances in which the validity of the Secretary of State's decision may be challenged. This must be done by making an application to the High Court within 6 weeks from the day after the date of this letter for leave to bring a statutory review under section 288 of the Town and Country Planning Act 1990.
55. A copy of this letter has been sent to Medway Council, and notification has been sent to others who asked to be informed of the decision.

Yours faithfully

M A Hale

Mike Hale

This decision was made by the Minister of State for Housing on behalf of the Secretary of State, and signed on his behalf

Annex A Schedule of representations

General representations

Party	Date
Rehman Chishti MP	6 October 2021
Duncan Parr, Rapleys LLP	15 October 2021
Peter Canavan, Carter Jonas	22 October 2021
Duncan Parr, Rapleys LLP	29 October 2021

9. INSPECTOR'S CONCLUSIONS

- 9.1 The following conclusions are based on the oral and written representations to the Inquiry and on my inspection of the site and its surroundings. The numbers in parentheses thus ^[], refer to paragraphs in the preceding sections of this Report from which my conclusions are drawn.
- 9.2 Having regard to the reasons for refusal pursued by the Council, together with the development plan context, statutory obligations in terms of heritage assets, and the evidence of interested parties on other matters, the main considerations that need to be addressed relate to the effect of the development proposed on:
- the character and appearance of the surrounding area, including the Gillingham Riverside Area of Local Landscape Importance and the role of the appeal site as a green buffer;
 - the significance of designated and non-designated heritage assets, including the historic landscape;
 - the availability of best and most versatile agricultural land, including the loss of the orchards; and,
 - the capacity and safety of the local highway network.

Character and Appearance^[6.45-6.122, 6.330, 6.331, 7.2-7.73, 7.222, 7.223, 8.7, 8.8, 8.18, 8.19, 8.23, 8.36-8.44, 9.2]⁶²¹

- 9.3 The appeal site is located outside any settlement boundary as shown on the Local Plan Proposals Map and lies within open countryside for planning policy purposes. Local Plan policy BNE25 is only permissive of development in the countryside if it maintains, and wherever possible enhances, the character, amenity and function of the countryside, offers a realistic chance of access by a range of transport modes *and* falls within a list of specified uses, none of which apply to the appeal scheme. There is no dispute in this regard, that the development proposed would conflict with this policy.^[6.40, 7.221]
- 9.4 The site also forms a significant part of the Gillingham Riverside Area of Local Landscape Importance (ALLI)⁶²² as defined by Local Plan policy BNE34, which

⁶²¹ See also CD5.27 Appendix 11.1, CD8.3 Appendix 11.1a, CD8.4 Appendix 11.1a, the proofs of Mr Hughes for the Appellant (CD10.3 and CD10.7) and Mr Etchells for the Council (CD10.8) together with the Landscape SoCG (LSoCG) (CD11.3)

⁶²² Mr Hughes Volume 2 Figure 3

policy seeks to prevent material harm to the landscape character and function of the ALLI, unless justified by economic and social considerations. These areas are described as being significant not only for their landscape importance, but also for other stated functions.

- 9.5 It is common ground between the parties that the ALLI, and thus the appeal site, comprises a valued landscape with regard to paragraph 170a) of the Framework.^[7.2, 7.3]⁶²³ Pursuant to paragraph 170a) such landscapes are to be protected and enhanced in a manner commensurate with their statutory status, as opposed to simply recognising its intrinsic character and beauty (as referenced in paragraph 170b)).
- 9.6 It is also a matter of agreement between the parties that the development proposed would give rise to adverse landscape and visual effects.⁶²⁴ What is not agreed is the extent of that impact.

Landscape Context

- 9.7 A description of the appeal site and its surrounds is set out in section 2 of this Report.^[2.1-2.4] In brief, it comprises more than 50 hectares of agricultural land, currently in use as commercial orchards. It lies within a broadly rectangular area of countryside, to the northeast of the Gillingham to Sittingbourne railway that sweeps down towards the Estuary from the urban area to the south. The area is characterised by sparse, scattered dwellings/clusters of dwellings, as well as the small hamlet of Lower Twydall, which sits to the west of the appeal site, with the small village of Lower Rainham, which straddles the Lower Rainham Road to the northeast. Both settlements are designated Conservation Areas and are surrounded by countryside, each having its own, individual identity. Beyond the railway line, to the southwest, is the urban settlement of Twydall/Rainham. Otherwise the site is surrounded by agricultural land which extends up to the Medway Estuary.⁶²⁵
- 9.8 **The Council's Medway Landscape Character Assessment 2011 (MLCA)**⁶²⁶ places the appeal site within the Lower Rainham Farmland landscape character area (LRFCA), which forms part of the more strategic North Kent Fruit Belt character area as defined by the County Council.⁶²⁷ For the most part, the LRFCA is bounded by Lower Rainham Road to the north and the railway line to the south.⁶²⁸ To all intents and purposes, it is split into two parts that are separated by already built/consented development between the northern end of Otterham Quay Lane and Berengrave Nature Reserve: the smaller part lies to the east of that, with the majority of the sub-area lying to the west. The appeal site occupies a significant proportion of that western part.⁶²⁹
- 9.9 The appeal site is representative of many of the key characteristics of the LRFCA. In particular, it makes a significant contribution to the farmland in the area and provides virtually all of the well managed areas of orchard referred to.^[7.41] I am mindful, in this regard, that the reference to the orchards in the

⁶²³ Eg paragraph 5.1(12) of the Main Matters SoCG (CD11.1), paragraph 2.2(3) of the LSoCG

⁶²⁴ SoCG on Main Matters paragraph 5.1(15) CD11.1

⁶²⁵ Eg Mr Etchells Volume 2 Figures 1 and 2

⁶²⁶ CD3.4 pages 68-69

⁶²⁷ **Kent County Council's Landscape Assessment of Kent (2004)**

⁶²⁸ Mr Hughes Volume 2 Figure 4

⁶²⁹ See Mr Hughes Volume 2 Figures 3 and 4

MLCA makes no reference to 'traditional', as opposed to 'commercial' orchards. Indeed, at the time the MCLA was produced, the orchards referred to as a characteristics would have been commercial orchards.⁶³⁰ I also found it to be tranquil in many parts, despite its proximity to Lower Rainham Road and the railway line (from which, as noted in the MLCA, there are attractive open views across the farmland). The character area is also noted as providing a distinctive green backdrop when viewed from the Medway Estuary. The stated actions for this character area are to conserve and create.

- 9.10 The ALLIs identified in the Local Plan are first and foremost a landscape designation, described as encompassing areas of landscape that enhance local amenity and environmental quality, providing an attractive setting to the urban area and surrounding villages. As a significant part of the Gillingham Riverside ALLI, the appeal site is also identified as providing an attractive rural setting to the Estuary and the northern edges of Twydall and Rainham.⁶³¹ I agree with the observation of Mr Etchells in this regard^[7.41] that the site provides an area of separation between Lower Rainham and the urban area of Twydall/Rainham. The LRFCA also identifies that the area has value as an extended buffer to the Country Park and protected Estuary coastline, which lie to the north. That is reflected as one of the stated functions of this ALLI.
- 9.11 Other stated issues for the LRFCA include:
- potential to restore traditional orchards; strengthen and enhance biodiversity opportunities; introduce more positive land management systems; respect for historic characteristics;
 - Grade 1 agricultural soil classification; and
 - threat of expansion to urban edges on south and west sides, along with gradual, pervasive erosion of rural character.
- 9.12 The stated Guidelines include restoration of rural characteristics, resisting further built development and consideration of this area integrally with the Riverside Marshes character area (to the north)⁶³² for its integral value as a green buffer, wildlife corridor and link to wider countryside.
- 9.13 **The Appellant's revised LVIA (TGLVIA)**⁶³³ breaks down the landscape character areas into smaller, more detailed local areas, placing the site within the Lower Rainham and Lower Twydall Fruit Belt (that essentially omits the eastern part of the LRFCA which has quite a different character from the rest of the area).⁶³⁴ That said, the landscape of the site (and some adjoining fields) is dominated by orchards, whereas the wider landscape to the west within this narrower character area, comprises mainly arable fields with some scattered settlement, and with the landscape to the east also being partly settled, with woodland and some enclosed fields of pasture.⁶³⁵
- 9.14 The landscape evidence of the Appellant majored on the reference in the MLCA to the landscape type of the LRFCA being urban fringe and the sub-type being

⁶³⁰ See the sequence of aerial photographs at ID3

⁶³¹ CD1.1 paragraph 3.4.104 and 3.4.99

⁶³² See Mr Hughes Volume 2 Figure 4

⁶³³ Tyler Green Landscape and Visual Impact Assessment September 2020 (CD8.3 Appendix 11.1a)

⁶³⁴ See Mr Hughes Volume 2 Figure 5

⁶³⁵ See Mr Hughes Volume 2 Figure 2 and ID3

urban fringe with urban/industrial influences.^[6.45, 6.51-6.57, 6.78,6.86] I am mindful in this regard, of the definition of urban fringe in the MLCA,⁶³⁶ which describes it as *Landscape adjacent to intrusive built-up/urban areas and containing features which intrude upon or detract from the essentially rural, agricultural character to a significant degree. Distinguished from rural fringe landscapes by a distinctively and predominantly urban feel, with urban/industrial elements dominating the landscape in some urban areas.*

- 9.15 Bloors Wharf on the estuary shoreline, referred to by the Appellant, was an historic industrial use. However, it lies outwith the LRFCA and the Lower Rainham and Lower Twydall Fruit Belt, as do the industrial/commercial uses referred to at Motney Hill and the Mariners Farm boatyard. More importantly, those uses are not apparent in any views from, nor are they experienced in any way from, these character areas, being separated from them by the fields and marshes within the Riverside Marshes character area. Whilst reference is also made to industrial units on Owens Way, that is a considerable distance away, on the edge of Gillingham, well beyond the junction of Lower Rainham Road with the A289 and outwith these landscape character areas. None of **those 'industrial' areas has any perceptible influence** whatsoever on the essentially rural character and appearance of the appeal site and its surroundings.
- 9.16 Putting the railway line and the urban area beyond to one side for the moment, no other features were drawn to my attention within, or surrounding, the landscape character areas within which the appeal site lies which I consider intrude upon, or detract from their essentially rural, agricultural character to any material degree. Returning to the railway line, the existing urban edge of Twydall is partially screened by the vegetation along the slight rail embankment that runs along the southern site boundary. However, the railway line is not, in my view, an intrusive feature in the landscape of itself. **It is the fact that it 'holds back' the built-up land of Twydall/Rainham on rising land behind which means that there is some urban influence along this edge of the site.** As a consequence, I am in no doubt that the established landscape character of this area is not distinguished by a distinctively and predominantly urban feel with urban elements dominating the landscape which might identify it as urban fringe.
- 9.17 I recognise that the listed characteristics for the LRFCA do include reference to neglected pockets of land and a busy road giving the area a transitional urban fringe character.^[6.52] However, the extensive appeal site itself does not include neglected areas, nor were any readily apparent in the immediate surroundings during my extensive site visit. I saw that its overwhelmingly dominant characteristic is as rural countryside. Indeed, I saw nothing during the visit that gave me any impression that the part of the character areas within which the appeal site lies can properly be described as urban fringe in the usual meaning of the phrase. It simply, as a matter of fact, is a rural area that is located adjacent to a railway line that clearly separates it from the urban area of Twydall/ Rainham. The change in character is distinct and abrupt, as **opposed to it being an area of 'transition' between town and country. I am** mindful in this regard, that policy BNE34 describes the Gillingham Riverside

⁶³⁶ CD3.4 Appendix B page 121

ALLI (the majority of which comprises the LRFCA and the Lower Rainham and Lower Twydall Fruit Belt) as an attractive rural landscape of orchards, mature hedgerows and arable fields with country lanes, providing an attractive setting to the Lower Rainham and Lower Twydall Conservation Areas, with attractive views from the river and railway, forming a green backdrop in views from the Estuary,⁶³⁷ being particularly important as a consequence of it providing a *rural setting* to both the Estuary and the northern edges of Twydall and Rainham.⁶³⁸ I agree with those descriptions.

- 9.18 The MLCA records that there is considerable variation in the condition of the landscape of the LRFCA. It notes that whilst some pockets are in serious decline (for instance the smaller part to the east of Otterham Quay Lane, which area may have informed the urban fringe references and is excluded **from the Appellant's Lower Rainham and Lower Twydall Fruit Belt character area**) other parts comprise well managed and cared for areas. Indeed, the area between Lower Rainham and Lower Twydall (the vast majority of which area comprises the appeal site) is specifically identified as being in generally good condition, with urban influences less apparent.
- 9.19 In support of its case, the Appellant refers to additional development in the area since publication of the MLCA in 2011.⁶³⁹ However, it is clear from the sequence of aerial photographs,⁶⁴⁰ that there have been no significant changes in settlement pattern since at least 2003 when the Local Plan was adopted, that materially affect the landscape character of this area. What development there has been,⁶⁴¹ has almost exclusively been confined to the east of the Rainham urban extension, beyond Berengrave Lane, a significant distance from the appeal site, in a part of the LRFCA that has a very different character and feel,^[7.7] outwith the Lower Twydall Fruit Belt area identified in the TGLVIA.

Visual Context

- 9.20 It is a matter of agreement⁶⁴² that the appeal site is generally well contained by mature vegetation, including woodland and tall hedgerows, limiting available views and extent of visibility. However, there are publicly available views into and across the site, including from the adjoining lanes, from Pump Lane which passes through the site, and from the bridleway which runs across its eastern part.⁶⁴³
- 9.21 Views across the appeal site from trains passing to the south are generally screened and filtered by trackside trees and vegetation.⁶⁴⁴ Outward views across the site are glimpsed through breaks in vegetation, with some clear views to the Estuary, especially in the winter.⁶⁴⁵ In views inland from the promontories of Motney Hill and Horrid Hill, and the northern shore of the

⁶³⁷ CD1.1 paragraph 3.4.107(xiii)

⁶³⁸ *ibid* paragraph 3.4.99

⁶³⁹ Mr Hughes proof paragraph 3.37 and Figure 3 in his Volume 2

⁶⁴⁰ ID3

⁶⁴¹ See Mr Hughes Volume 2 Figure 3

⁶⁴² LSoCG (CD11.3)

⁶⁴³ See eg Mr Etchells Appendix B photos and Mr Hughes Volume 2 photoviewpoints. See also Mr Etchells proof paragraphs 3.6.1a-f and Mr Hughes proof paragraph 3.91-3.104 for more detail on the extent and composition of views as well as the TGLVIA.

⁶⁴⁴ eg the video clip appended to the LSoCG (seconds 14-58) and Mr Etchells photos 13 and 14

⁶⁴⁵ eg Mr Etchells photo 27

Estuary, the appeal site is set beyond vegetation and trees to the shoreline, and development and hedgerows along Lower Rainham Road. In these views, the urban edge of Twydall/Rainham forms a developed backdrop on the rising land to the south of the appeal site, with the appeal site extending across the view.

Landscape effects

- 9.22 The TGLVIA identifies the Lower Rainham and Lower Twydall Fruit Belt character area as having an overall medium landscape sensitivity to residential development, largely on the basis of the influence of the settlement edge of Twydall and the asserted urban fringe character. It considers that the estimated ten year construction phase would give rise to site-wide major adverse landscape effects (ie the development would cause irrevocable damage, degrade or badly diminish landscape character features, elements and their setting: the development would be irrevocably visually intrusive and would disrupt fine and valued views both into and across the area).⁶⁴⁶ Over the same period, the effects on the wider LCA are identified as major/moderate. Moderate adverse effects are defined as development that would cause substantial permanent loss or alteration to one or more key elements of the landscape, would include the introduction of elements that are distinct but may not be substantially uncharacteristic with the surrounding landscape and where development would be clearly visible, and would result in adverse effects upon the landscape.
- 9.23 On completion, and taking account of the proposed mitigation planting etc, the TGLVIA identifies the site-wide effects on landscape as being major/moderate adverse,^[6. 81] reducing to moderate adverse for the wider LCA. In terms of residual effects (ie 15 years after completion) both site-wide and the wider LCA effects are identified as being moderate adverse.^[6.78, 6.82]
- 9.24 Mr Etchells, for the Council, considers the site and its surrounds to be of medium quality and medium to high value in landscape terms, leading to an assessment of medium to high sensitivity.^[7.42] In his view, in the winter of the first year following completion, the landscape effect of the development within the site would high adverse, with a moderate to high adverse effect for the surrounding area,^[7.44] those effects being felt over the area of the visual envelope.⁶⁴⁷ Long term effects would decline to generally moderate/high adverse for the site itself, and to moderate adverse for the landscape around the site after 10-15 years.^[7.45]
- 9.25 Whilst I have been guided by those formal assessments, the comments that follow are also informed by what I observed during my very comprehensive site visit.
- 9.26 The development would, as a matter of fact, comprise a significant and large scale development on large swathe of commercial orchards in a rural area. It would result in the loss of those orchards, which extend across most of the site, as well as significant lengths of mature roadside hedging at the proposed access onto Lower Rainham Road and around the proposed junctions/

⁶⁴⁶ This, and the definitions that follow, are taken from the TGLVIA Appendix 2

⁶⁴⁷ See Mr Etchells Figure 4 With the exception of photoviewpoint 1 (Hoo Peninsula) and viewpoints within the urban area to the south (Nos 20,21 and 22), that encompasses all the photoviewpoints in Volume 2 of Mr Hughes

realignment of Pump Lane.⁶⁴⁸ Both the orchards and hedgerows are characteristic features of this landscape type, with the appeal site comprising almost the entirety of the well managed area of orchards within both the LRFCA and the Lower Rainham and Lower Twydall Fruit Belt character area.

- 9.27 Pump Lane is an unlit, very narrow, sometimes single track country lane with no footways, which wends its way from south of the railway line up to Lower Rainham Road, bisecting the appeal site. Towards its northern end, it is fronted one side by a small group of dwellings, but for the most part, it is lined along both sides with mature hedges/hedgebanks. Indeed, it is identified as a rural lane by policy BNE47 which, among other things, seeks to protect the landscape value of such lanes. As set out in the explanatory text to the policy, these lanes were identified as those of the highest physical landscape, amenity, nature conservation and historic value.
- 9.28 Four new junctions are proposed on Pump Lane to facilitate its crossing by the proposed estate loop road, as shown on Drawing No 20230-05F.⁶⁴⁹ Notwithstanding that access details are for determination at this stage, the full extent of proposed hedgerow removal as part of those works was not apparent until shortly before the Inquiry, as further clarified during the event.⁶⁵⁰
- 9.29 In total, the new junctions on Pump Lane would require the removal of around 175m of hedgerow.⁶⁵¹ The layout of the southern junctions⁶⁵² would require any replacement planting to be set back significantly to allow for forward visibility. At that point, the lane would cease to be narrow and it would no longer be enclosed by hedgerows. At the northern junctions,⁶⁵³ the road would be realigned to incorporate two staggered T-junctions, with the effect that the **road would cease to be a 'lane' as such. As acknowledged by Mr Hughes in cross-examination, at both junctions, drivers heading north or south would have direct views into (and when turning would be looking directly at) built development.**^[7.47] I am in no doubt that, particularly at the new junctions, and acknowledging the introduction of community orchards along sections of the lane,⁶⁵⁴ the highway would have the character and appearance of a residential access road, as opposed to a rural country lane.
- 9.30 The TGLVIA includes an illustrative Landscape Framework Plan, a later version of which is included in the evidence of Mr Hughes.⁶⁵⁵ Even taking account of the planting proposed, including the proposed community orchards, the character of the local landscape would change completely, from a largely open rural area to a new residential estate. Built development would extend up to Lower Rainham Road, in effect 'leap-frogging' the railway line which, between Yokosuka Way in the west and Lower Bloors Way/Berengrave Lane to the east, **is a physical and perceptual barrier that 'contains' the urban area of Twydall/Rainham to the south, providing a strong defensible boundary to the settlement here.**

⁶⁴⁸ ID20

⁶⁴⁹ Overall Access Strategy and Key Network (ID20)

⁶⁵⁰ See the plans at ID20

⁶⁵¹ ID20

⁶⁵² Dwg No 13374/P15a (ID20)

⁶⁵³ Dwg No 13374/P16a (ID20)

⁶⁵⁴ See eg the illustrative masterplan Dwg No 11047/PL009C (Appendix 5 to CD8.6)

⁶⁵⁵ Mr Hughes Volume 2 figure 8

- 9.31 Proposed planting around the site boundaries and within the site would soften the impact to some extent. Nevertheless, when travelling along Lower Rainham Road from the west, and when travelling along Pump Lane and Lower Bloors Lane, I am in no doubt that the village of Lower Rainham would be read as part of that extended urban area. It would lose all of its rural countryside setting on the southern side of the main road and would no longer be seen or perceived as a separate settlement with its own rural identity. It would effectively be subsumed within the extended urban area of Twydall/Rainham.^[7.43(iv)] **That impact was recognised in the appellant's original LVIA submitted with the planning application.**⁶⁵⁶
- 9.32 The bridleway that cuts across the eastern half of the appeal site currently has a very rural feel as it passes through the orchards, with some open attractive views across the appeal site.⁶⁵⁷ Whilst improvements to the bridleway are proposed it would, as a consequence of the development proposed, pass through a housing development, including having to cross the proposed estate loop road. The current, rural and tranquil landscape character of the route would, in my view, be completely lost.
- 9.33 The site also has a contiguous boundary with the southern end of the rural hamlet of Lower Twydall. Again, notwithstanding the planted buffer zone proposed, the individual identity of that settlement would be undermined to some extent as a consequence of the development proposed, although not to the same degree as Lower Rainham.
- 9.34 Aside from the effects on the extensive appeal site itself, I recognise that the landscape effects that I have identified would be experienced from a relatively constrained area around the site although, as a whole, it is a relatively large area of roughly 1.5 x 1.5 km.⁶⁵⁸ That visual envelope is a narrower area than the Lower Rainham and Lower Twydall Fruit Belt area identified by the Appellant, but extends to the north of Lower Rainham Road, to include the Country Park, marshes and Estuary shoreline, together with the Horrid Hill and Motney Hill promontories.⁶⁵⁹
- 9.35 In my view, in no small part due to the contention that this is an area of urban **fringe, the Appellant's assessment generally underestimates the harm to the** significance of the landscape at both site wide and the wider visual envelope level during the ten year construction period, on completion of development and at the site wide level in terms of residual impacts. I am mindful, however, that both assessments are comparable in finding the residual impacts to be moderate adverse in terms of the visual envelope, which forms part of the ALLI and which is a valued landscape in the terms of the Framework.
- 9.36 I have no doubt that the appeal development would be built to a high quality and that the large areas of green infrastructure proposed⁶⁶⁰ could result in an attractive place in which to live. Nevertheless this would, in essence, be a

⁶⁵⁶ Lloyd Bore LVIA (CD5.21 Appendix 11.1)

⁶⁵⁷ Mr Etchells Appendix B photos 23-31 and Mr Hughes Volume 2 photoviewpoints 14a, 14b and 15

⁶⁵⁸ Mr Etchells proof paragraph 6.2.2 and his figure 4

⁶⁵⁹ See Mr Etchells Figure 4. Although the depth from the railway line to the promontories is around 1.5km, the depth to the shoreline is around 1km.

⁶⁶⁰ Eg Revised Site Master Plan (11047/PL/009C) and Green and Blue Infrastructure Parameter Plan (11047/PL/005B) (Appendices 5 and 6 attached to the Appellant's Statement of Case – CD8.1)

large suburban housing estate, which is not a characteristic feature associated with the landscape of the relevant landscape character areas, or the Riverside Gillingham ALLI. Having regard to the definition of moderate adverse I would, in general, agree with the conclusion of the main parties in terms of the residual impact on the wider area, although if there were a scale within that, I would place the harm at the higher end, on the basis that the development proposed would be uncharacteristic and of a significant scale.

Visual Effects

- 9.37 Visual receptors are people with the potential to have their views and visual amenity affected by the development proposed. Those views can be experienced from public and/or private places.

Public viewpoints

- 9.38 Views form part of the experience of those enjoying the Riverside Country Park, including Horrid Hill and Motney Hill and the approaches to them, and the long distance footpath, Saxon Shore Way, which runs along the Estuary coastline here.⁶⁶¹ I consider those receptors to be of medium to high sensitivity. The contribution that the visual experience and views make to the value of landscape has been incorporated into the assessment of landscape effects above and informs the sensitivity of users. Having regard to the table of magnitude of change for visual receptors,⁶⁶² I consider that there would be a medium degree of change for those receptors, and moderate adverse visual effects for those with the most open views to the site.
- 9.39 For users of Pump Lane there would be a high degree of change around the areas of the proposed junctions, where significant lengths of hedgerow would be removed, altering the character of the lane itself completely and with views of the new houses and other uses in the adjoining parts of the site.⁶⁶³ I consider that change to be moderate/high adverse.
- 9.40 Other than at those proposed junctions, there would be no physical change to the lane itself. However, whilst development would be set back beyond areas of green space, including community orchards and the proposed village green, the built development behind would, even when that planting was established, still, in my view, be readily perceived. I consider those changes to be moderate adverse.
- 9.41 Users of the bridleway are of high sensitivity. For most of its route, the bridleway would run through the residential development areas. There would be clear and short distance views from it of the new development at gaps in the hedging and where it would cross the new estate loop road, as well as from the proposed village green which it would cross, before terminating on Pump Lane at the proposed local centre. Even where the route was screened in visual terms, there would still be a general awareness of passing through a residential estate, rather than passing through orchards. I consider the visual

⁶⁶¹ **INSPECTOR'S NOTE:** I consider that views from the Hoo Peninsula on the northern side of the Estuary to be sufficiently distant that the effect of the development proposed on those views would not be material to the outcome of this appeal.

⁶⁶² TGLVIA Appendix 2 (CD8.3 Appendix 11a)

⁶⁶³ ID20

effects in this regard to be high adverse, even once new planting etc is established.

- 9.42 For users of Lower Rainham Road, there would be a high degree of change at the main site entrance as a consequence of the highway works involved, including highway widening and the introduction of a ghost right-turn lane, together with the removal of some 170 metres of hedgerow on the southern side of the road here.⁶⁶⁴ On that basis, I consider the effects to be moderate adverse for motorists at the point of the access. For pedestrian users of the footways here, that effect would be slightly higher.
- 9.43 In terms of users of Lower Twydall Lane, any views of the appeal site are limited at best. Any visual effects in this regard would be insignificant. However, although the lane terminates at the railway, there is pedestrian access to the south via a footbridge, from which there are clear views across the western part of the appeal site. The visual impacts from there would be moderate to high adverse.
- 9.44 Lower Bloors Lane runs along the eastern site boundary. Like Lower Twydall Lane, it terminates at the railway, with a footbridge allowing pedestrians to carry on into the urban area beyond. For the most part, views from the lane across the appeal site are precluded by tall established hedgebanks which would be reinforced, in addition to areas of buffer planting behind. I agree with the Appellant in this regard, that any visual effects would be minor adverse where perceptible. There are no clear views of the appeal site from the footbridge here.
- 9.45 Views for rail passengers, who are considered to have low sensitivity, were discussed above in terms of landscape effects. Passenger views of the orchards and beyond to the Estuary would be lost, replaced by views of a housing estate. The illustrative plans and Landscape Framework Plan show a narrow belt of planting alongside the slight embankment here. I consider that the visual effects would be minor adverse.

Private Residential Views

- 9.46 Most of the views from properties to the south of the railway line in Twydall are from upper floor windows.⁶⁶⁵ Whilst there is a generally dense line of trees and shrubs along the north side of the railway line to the east of Pump Lane, the vegetation alongside the railway line to the west is generally thinner and lower, where the views to the north are more open, though still mainly filtered to some degree. In these views, the orchards and views towards the Estuary would be replaced by built development. The degree of change would vary with the presence of filtering vegetation, but for those with the most open views, taking account of the fact that those views are across a busy railway line, I consider that the visual effects could be moderate adverse for some properties, reducing to anywhere between insignificant and slight to moderate adverse effects for others.
- 9.47 The Council estimates there to be around seven properties on Lower Rainham Road with rear facing views across the appeal site, including Bloors Place (see

⁶⁶⁴ Dwg No 13374/P17a (ID20)

⁶⁶⁵ Mr Etchells Appendix B photos 13, 14 and 37 and Mr Hughes Volume 2 photoviewpoint 19

heritage section below).⁶⁶⁶ For the most part, those would be from upper floor windows across well vegetated boundaries although, as is clear from the evidence of Ms Stoten for the Appellant,⁶⁶⁷ that the boundary of the newbuild properties to the south of the Three Mariners is much more open. The existing orchard views would be replaced with views of the proposed school, with residential development beyond that. The effects would vary, depending in intervisibility, from high adverse to slight/moderate adverse.

- 9.48 There are a number of properties scattered along both sides of Pump Lane, all of which have some views across the existing orchards to varying degrees. **The Appellant's evidence considers visual effects for all occupiers to be moderate adverse.** Whilst that may be true for a number of the properties, I consider that for others, it is higher.
- 9.49 Southernmost occupiers of the short run of properties at the northern end of the lane would have views of the new buildings both to the west (of the proposed care facility) and to the southeast (of the proposed school). As such, they would be largely surrounded by the new development. Even taking account of the planting proposed, I agree with the Council that the visual effects would be moderate to high adverse.
- 9.50 The three dwellings on the east side of the lane, close to Pump Farm, have far reaching views across the orchards. As proposed, they would face onto the new village centre and would be adjacent to the proposed new junctions to facilitate the crossing of Pump Lane by the loop road at this point. The new school would lie to the east of those properties. The new village green would lie to the south/southwest, with residential development up to 12 metres in height beyond. Again, I agree with the Council that there would be a high degree of change for these receptors, resulting in moderate to high adverse visual effects.
- 9.51 The outermost dwellings within the group of properties at Russett Farm, adjacent to Pump farmhouse, would have views mainly of the new houses in the western part of the site (up to 12 metres in height) albeit seen across proposed community orchard planting. For most of those, I consider the visual effects would high adverse.
- 9.52 Four properties on Lower Bloors Lane have views across the appeal site. The most northerly of these is located at a point where there is no significant boundary hedging to the appeal site, with clear views across the appeal site from both ground and first floor level. Visual effects for occupiers would be high adverse. The remaining properties, further along the lane are better screened. Allowing for boundary planting etc, I agree with the Council that effects are likely to range from slight to moderate.
- 9.53 There are limited views towards the appeal site from properties at the southern end of Lower Twydall Lane. What views there are, are heavily screened by existing vegetation. Combined with the development set back proposed and the proposed planting, I agree with the Appellant that visual effects would be negligible.

⁶⁶⁶ Mr Etchells proof paragraph 6.4.1(a)

⁶⁶⁷ CD10.2 Plate 36

Riverside Gillingham ALLI

9.54 As well as their landscape importance, the ALLIs are significant for other important functions. The Local Plan identifies the specific functions of the Riverside Gillingham ALLI thus:⁶⁶⁸

- forms an important green buffer separating the built-up areas of Twydall and Rainham from areas of international importance for nature conservation and recreation along the Medway estuary;
- enhances the setting of the Medway Towns Northern Ring Road on the western boundary, and allows attractive views from the river and railway;
- provides residents within an extensive urban area with access to an attractive, rural landscape;
- provides an attractive setting to the Lower Rainham and Lower Twydall conservation areas;
- contains a number of orchards, mature hedgerows and farm groups complementing and contributing to the Riverside Country Park; and
- forms a green backdrop when viewed from the Medway Estuary.

9.55 These functions are also identified in the MLCA.

9.56 Green Buffer: For the most part, the ALLI is bounded by the railway line to the south and the Estuary to the north, with a depth from railway to shoreline of roughly 1 km. With a width of between 750 metres to 1 km, and a depth of around 750 metres, the open, undeveloped appeal site forms a significant part of the ALLI, comprising around 75% of its depth. As such, it is clearly a substantial and integral part of the buffer.

9.57 The ALLI includes not only the LRFCAs, but also the Riverside Marshes LCA, which lies on the northern side of Lower Rainham Road.⁶⁶⁹ The MLCA confirms, among other things, that the Riverside Marshes LCA provides a valuable recreational and biodiversity resource.^[6.116] **The Appellant's TGLVIA** subdivides it into two smaller areas, described as the Medway Marshes Farmland LCA (between the main road and the shoreline) and the Medway Shoreline and Riverside Country Park LCA, which includes the two promontories. It is relevant to note at this point, that the designated boundary of the Country Park itself, includes both those LCAs.⁶⁷⁰ It seems to me that *together*, it is these LCAs that comprise the areas of recreation and international importance for nature conservation referred to in the first bullet above. Whilst I agree with the Appellant that there would be no direct impact of development proposed on those LCAs,^[6.61] I do not agree with the contention that the development would *reduce* the degree of separation between them and the railway line.^[6.118] Rather, were the appeal scheme to go ahead, development would extend from the railway all the way up to Lower Rainham Road, leaving

⁶⁶⁸ CD1.1 paragraph 3.4.107(xiii) This provides the justification for designation of this ALLI and guidance on the landscape features and functions that policy BNE34 seeks to protect.

⁶⁶⁹ Mr Hughes Volume 2 figure 3

⁶⁷⁰ See Mr Hughes Volume 2 figure 3

no buffer at all between the built up settlement edge and the identified areas of recreation and nature conservation on the northern side of the road.

- 9.58 The Appellant suggests that the proposed development would offer enhancements to the functionality of the site in terms of accessibility between the urban area of Twydall, the wider rights of way network and Riverside Country Park. However, whilst noting that this latter point featured in the General Matters SoCG,⁶⁷¹ it was confirmed by Mr Goodwin (the ecology witness for the Appellant)⁶⁷² that, in order to avoid providing a direct link which new residents could use to easily access the designated Medway Estuary and Marshes SPA/Ramsar site,⁶⁷³ no enhanced pedestrian linkage between the application site and the Country Park towards the north is proposed. In addition, no general parking areas are proposed within the site (aside from those within the care and village centre, both of which would be subject to parking and management controls) and so the development would not provide parking for individuals to park and then access the Country Park and European designated sites beyond.
- 9.59 In my view, even taking account of the green infrastructure proposed, including the community orchards, the scale of the appeal scheme would materially undermine the identified green buffer function, eroding it completely at this point.
- 9.60 Views from the railway and Estuary: As noted earlier, there are views across the appeal site from trains passing to the south. Although those views are filtered in places by trackside trees and vegetation, as is clear from the video clip,⁶⁷⁴ the appeal site is clearly appreciated from the train, with clear views in places across the site all the way across the site to the Estuary, especially in winter months. That landscape and those views would be replaced with a residential estate.
- 9.61 During the site visit, I saw that from the causeway approach to the promontory of Horrid Hill and Horrid Hill itself, as well as from Motney Hill,⁶⁷⁵ there are clear views of the green undeveloped appeal site as part of the wider green ALLI, on gently rising ground as a backdrop to the Estuary, with the urban settlement of Twydall/Rainham behind. Again, as a sizeable and integral part of those views, development of the site as proposed would materially undermine the contribution that it makes to these identified functions.
- 9.62 Access to an attractive rural landscape: Public access through the appeal site comprises the bridleway and Pump Lane. Users of those routes currently pass through the attractive rural countryside of the appeal site.
- 9.63 Whilst residents within the urban area would, in principle, be able to access areas of open space within the appeal site, that space would be in the context

⁶⁷¹ CD11.3, Point 6 (page 6)

⁶⁷² In his written evidence (at Appendix 5 to the proof of Mr Parr) and in answer to my questions at the Inquiry. See Annex D below for further information on this.

⁶⁷³ The location of which is shown on Plan EC01 in CD5.13. See Annex E below for more detailed information on this.

⁶⁷⁴ See eg seconds 14-58 of the video clip appended to the LSoCG and Mr Etchells photos 13 and 14

⁶⁷⁵ Eg Mr Etchells photos 32, 34 and 35 and Mr Hughes photoviewpoints 2 and 4 **INSPECTOR'S NOTE:** I found the appeal site and indeed the ALLI to be more readily appreciated on the ground as it were, than is portrayed in the photographs.

of a housing estate, as opposed to an attractive rural landscape. Moreover, users of the bridleway would no longer pass through rural countryside, with the rural character and appearance of Pump Lane materially changing not only as a consequence of being bound to both sides by residential development, but also the introduction of new junctions along it/realignment and hedgerow removal. As a consequence, even taking account of the proposed community orchards along parts of Pump Lane and the other planting proposed, the appeal site would no longer provide residents within the urban area access to an attractive rural landscape.

- 9.64 Providing an attractive setting to the Conservation Areas: I deal below with the contribution of the appeal site to the heritage significance of Lower Twydall and Lower Rainham Conservation Areas as part of their setting. That is a separate matter to their setting in terms of character and appearance generally.
- 9.65 As set out above, the extent of the development proposed would effectively subsume the village of Lower Rainham, and its Conservation Area, into the extended urban area of Twydall/Rainham, with the consequence that it would lose its separate identity and character as a rural village.
- 9.66 The site also has a contiguous boundary with the southern end of Lower Twydall. Notwithstanding the planted buffer zone proposed, the individual identity of that settlement, and its Conservation Area, would also be undermined, but not to the same degree as Lower Rainham.
- 9.67 Contains orchards and mature hedgerows: Whilst the proposal would result in the loss of almost all of the orchards within the ALLI, areas of community orchard are proposed within the scheme. Although covering a much smaller area they could, if delivered successfully, mitigate the orchard loss to some, albeit limited extent.
- 9.68 As shown on the illustrative Green and Blue Infrastructure Plan,⁶⁷⁶ read together with the revised Hedgerow Removal Plan,⁶⁷⁷ a significant amount of mature hedgerow would be removed to facilitate the development proposed. Putting to one side the effect of that on the character of Pump Lane, which is dealt with elsewhere, I recognise that the appeal scheme includes replacement planting.

Conclusions on Character and Appearance

- 9.69 I consider that overall, the appeal scheme would have a substantial adverse landscape and visual impact, with corresponding harm to the character and appearance of a wide swathe of countryside between Lower Rainham Road and Twydall/Rainham. I recognise that those effects would reduce over time to some extent, and I am mindful in this regard of the extensive landscaping proposals. However, whilst the visual envelope is relatively tightly drawn around the site it nevertheless covers a sizeable area. As such, I consider that the degree of harm would be significant. In coming to that view, I have also had regard to the status of the site, lying as it does within a valued landscape as recognised by its designation as an ALLI in the Local Plan and the harm that

⁶⁷⁶ No 11047/PL/005B (Appendix 6 to CD8.1)

⁶⁷⁷ ID20

would be a consequence not only to its landscape importance, but also to its functions, particularly that as a green buffer.

- 9.70 Those conclusions bring the development into conflict with policy S1, which among other things seeks to restrict outward peripheral expansion onto fresh land, particularly to the north and east of Gillingham. There would be conflict too with policy BNE25, not only because the scheme does not meet any of specified criteria for development in the countryside, but also because it would not maintain or enhance the character, amenity or functioning of the countryside. The scheme would also conflict with policy BNE34, given the harm that I have found to the character and functions of the ALLI, including its function as a green buffer. The policy does, however, require that any such harm be weighed against economic and social benefits. I deal with that in my overall planning balance section at the end of this report. There would be conflict too in this regard, with paragraphs 170a) and b) of the Framework, which together and among other things seek to protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. I also consider there to be conflict with policy BNE47, in that the landscape character of Pump Lane, identified on the Proposals Map as a rural lane, would be materially undermined by the alterations required to facilitate the new junctions associated with the proposed estate loop road.
- 9.71 I recognise that the Council has, at times, permitted development on parts of the ALLI.⁶⁷⁸ However, whatever the detailed circumstances that led to those permissions, those sites are patently not of the same scale as the development now proposed and, even, more importantly they are, for the most part, located within a part of the ALLI that has a quite different character and appearance from that part within which the appeal site is located. They do not, in this regard, set any kind of precedent for appeal scheme, or diminish the value of the ALLI.

Heritage Assets^[6.44, 6.123-6.184, 6.337, 6.338, 7.94-7.118, 7.225-7.227, 8.9, 8.37, 9.2, 10.8]⁶⁷⁹

- 9.72 The Environmental Statement⁶⁸⁰ identifies that the appeal site is within an area of high archaeological potential for both the prehistoric and post-medieval periods, with moderate and low to moderate potential for the Roman and Anglo-Saxon periods respectively. Based on current information, some of those remains could fall into the category of being equivalent in significance to scheduled monuments.
- 9.73 As a working orchard, the Appellant resisted a detailed evaluation prior to **determination of the application as requested by the County Council's senior** archaeological officer. As a pragmatic way forward, and on the basis that any important remains would be likely to have more impact on detailed location/distribution of houses than precluding development completely, the Council agreed that, were the appeal to be acceptable in all other regards, rigorous planning conditions could provide sufficient protection. On that basis, I had no reason to hear evidence on this particular matter.

⁶⁷⁸ Mr Hughes Volume 2 Figure 3

⁶⁷⁹ See also CD5.39 Appendix 14.3, CD6.3, CD6.10, CD8.4 Appendix 14.3a, the proofs of Ms Stoten for the Appellant (CD10.2 and CD10.15) and Ms Wedd for the Council (CD10.7) the Heritage SoCG (CD11.2) and the Main Matters SoCG (CD11.1) paragraph 5.1(9)

⁶⁸⁰ CD8.3 Appendices 14.1 and 14.21

- 9.74 The parties are agreed that the relevant designated heritage assets comprise seven listed buildings and two Conservation Areas, and that any effect on significance would derive from changes to their setting as opposed to any direct effects.⁶⁸¹ An agreed non-designated heritage asset is also in the vicinity. In addition, the Council maintained that the historic landscape of the appeal site is a non-designated asset in its own right. That position was contested by the Appellant.
- 9.75 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard be given to the desirability of preserving the setting of listed buildings. Whilst no statutory protection is afforded to the setting of other heritage assets, including Conservation Areas, paragraphs 189 and 190 of the Framework require an assessment of the significance, including any contribution to that significance made by their setting, of *any* heritage assets that might be affected by a development proposal.
- 9.76 Paragraph 194 of the Framework makes clear that the significance of heritage assets (defined in the Glossary to the Framework as deriving not only from an **asset's physical presence, but also its setting**) **can be affected by a change in** their setting, explained as the surroundings in which they are experienced. **The Government's Planning Practice Guidance**⁶⁸² confirms that this is often expressed by reference to the visual relationship between the asset and the proposed development, and associated visual/physical considerations, including our understanding of the historic relationship between places. It is the *significance* of the heritage asset that enjoys protection in this regard, described in the Framework as its value to this and future generations. Setting is not, of itself, a heritage asset.
- 9.77 In relation to designated assets, the Framework identifies harm as being substantial or less than substantial. Putting to one side the heritage status of the historic landscape, the settled position of the main parties is that any harm that would arise to the significance of the *agreed* heritage assets would be less than substantial in nature. This does not mean that any harm would be unimportant or of little consequence. Indeed, the Framework also confirms **that great weight should be given to the asset's conservation.**
- 9.78 Paragraph 196 of the Framework explains that any less than substantial harm to the significance of designated heritage assets is to be weighed against public benefits. In the case of any harm to the significance of non-designated heritage assets, paragraph 197 of the Framework makes clear that a balanced judgement should be made, having regard to the scale of any harm and the significance of the asset.
- 9.79 Local Plan policy BNE18 reflects the statutory duty set out at Section 66 of the Planning (Listed Buildings and Conservation Areas) Act, resisting development that would adversely affect the setting of a listed building. Policy BNE14

⁶⁸¹ Heritage SoCG CD11.2 **INSPECTOR'S NOTE:** A very small portion of the appeal site (between Chapel House and Lower Rainham Road) extends into the western end of Lower Rainham Conservation Area. That land is well **vegetated at present and would remain so were the appeal to succeed. It was no part of the Council's case that** there would be any harm to the character or appearance of the Conservation Area in this regard, or its heritage significance. I have no reason to disagree.

⁶⁸² Paragraph: 013 Reference ID: 18a-013-20190723

requires that development affecting the setting of Conservation Areas should preserve or enhance their historic or architectural character or appearance.

Bloors Place (grade II*), range of outbuildings including cartlodge and granary west of Bloors Place (grade II) and garden walls to south and east of Bloors Place (grade II): [6.130, 6.154-6.162, 6.166, 7.100, 7.103(vii), 7.109, 7.110]

- 9.80 Bloors Place is located on the southern side of Lower Rainham Road, some 60 metres to the northeast of the appeal site, at the eastern end of the Lower Rainham Conservation Area. It comprises a timber framed, two-storey plus attic house originally constructed as a Hall House in 1470-1510, with later additions. It is set well back from the main road behind a densely vegetated frontage, within a large immediate curtilage which also contains the associated grade II listed outbuildings and walls, and gardens. Wider grounds to the southwest and southeast of the asset include orchard outwith the appeal site. The gardens are very enclosed, with pleasure gardens immediately adjacent to the house enclosed by high walls and with further produce gardens beyond also enclosed by high walls.
- 9.81 The landholding originally associated with Bloors Place was very extensive and included land that now comprises the eastern half of the appeal site. Based on the 1838 Rainham Parish Plan Map,⁶⁸³ it would seem that this was a large, dispersed landholding supporting a mixed farming base, rather than a consolidated area centred on the house. Any functional association with the appeal site has long since ceased.
- 9.82 The Bloors Place complex has been subdivided into multiple separate residences and ownerships. The Wagon Lodge has been converted to a residence with a separate curtilage (including the other listed outbuildings). The former Oast House to the south (an undesignated asset – see below) has also been converted to a separate residence. In addition, a large fruit storage/machinery building has been erected to the south of the Oast House, and a roofing company operates from the former dairy and a yard at the southern edge of the complex.
- 9.83 The heritage significance of Bloors Place derives primarily from its built form, which has architectural, artistic and historic illustrative value. I consider that the main elements of setting which contribute to its significance relate to its immediate curtilage, including the outbuildings, which together give legibility to the historic mixed farming use of the complex, and the gardens and listed walls. The configuration of these, with high walls enclosing the spaces around the house, and the strong lines of vegetation present in the vicinity of the asset beyond its immediate curtilage, including around the boundaries with the appeal site, materially limit views out to the wider area. The views of Bloors Place from the appeal site, such as they are, lie beyond the enclosed gardens at the rear of the property and beyond further areas of orchard, with the house having no functional relationship with the appeal site. I consider any contribution to the significance of Bloors Place made by the appeal site as part of its setting, to be very limited.

⁶⁸³ Ms Stoten proof (CD10.2) page 47

- 9.84 In terms of any contribution to significance by other, intangible qualities of setting, whilst the walled gardens would give some sense of tranquillity to the immediate surroundings, the outbuildings have been converted to residences and commercial uses. It is also close to the main road.
- 9.85 The range of listed outbuildings lies some 65 metres to the north-east of the appeal site, with the listed garden walls being within some 25 metres of so of the site. The outbuildings most likely date from the C18th with later alterations. They are of brick, with partly weatherboarded timber frame and tiled roofs. They have been converted to separate residences, each with its own curtilage. The garden walls, of English bond brick and limestone rubble with dressings, date from the mid-C17th. They enclose the eastern and southern kitchen gardens.
- 9.86 The heritage significance of the listed outbuildings and walls is primarily derived from their built form, which has architectural, artistic and historic illustrative value. The element of setting that makes the greatest contribution to their significance is clearly Bloors Place, the presence of which enables the origin of the formerly functionally associated outbuildings and walls to be understood. Their immediate surrounds, comprising the grounds of the residences and the enclosed gardens of Bloors Place, from where each asset can be appreciated, also contribute to their significance.
- 9.87 Any functional association of the listed buildings/structures with the appeal site has long since ceased and there is little, if any, intervisibility between them and the appeal site, being separated as they are by the Oast House, the roofing company premises and orchard (beyond the appeal site). As such, the appeal site does not allow any meaningful appreciation or understanding of the listed outbuildings and walls.
- 9.88 The appeal scheme would introduce new residential development, potentially up to 12 metres in height within around 60 metres of the complex, together with a school, up to 10 metres in height, within around 120 metres at their closest.⁶⁸⁴ The new housing and school would be set back from the shared boundaries, behind additional boundary planting.
- 9.89 As acknowledged for the appellant, some limited views of the development are anticipated in the winter months from the rear of Bloors Place and perhaps, obliquely, from its eastern elevation.⁶⁸⁵ However, there is no suggestion that the building was designed to have views across the appeal site. Its secluded curtilage, which makes the most significant contribution in terms of setting to the significance of the asset, would not be changed by the development proposed, the former farming use remaining legible within the complex through the presence of the historic outbuildings and walls, and the adjacent orchard areas outwith the appeal site. Any views that might be available towards the appeal site from higher level windows at the property, would be across those private orchards and screening vegetation and are not, in my opinion, integral to the heritage significance of Bloors Place, given the orientation of the house and the siting of the kitchen garden and walls.

⁶⁸⁴ Ms Wedd proof (CD10.7) paragraph 6.20

⁶⁸⁵ Ms Stoten proof (CD10.2) paragraphs 6.154-6.156

- 9.90 In terms of the listed outbuildings and walls, the appeal scheme would, at its closest, introduce housing potentially up to 12 metres in height, and a school up to 10 metres in height, within about 60 metres.⁶⁸⁶ However, that would be beyond intervening mature vegetation. Whilst the character of the appeal site would change, there is little intervisibility between land within the appeal site and the listed walls, and none with the listed outbuildings.⁶⁸⁷
- 9.91 Historic England believes that there would be harm to the significance of Bloors Place due to its relationship with the surrounding fields and rural setting, which **it considers to be important to understanding the asset's historic use as a farmhouse and its origins as a rural dwelling.**⁶⁸⁸ It goes on to express the view that that relationship is still appreciable from the surrounding roads and pathways and from trains passing along the southern site boundary (some 600m away).
- 9.92 Dealing with this last point first, as is clear from the video extract of the train journey past the appeal site,⁶⁸⁹ notwithstanding the distance separation, the Bloors Place complex is completely obscured in views from passing trains due to the band of conifers that runs along most of the length of the bridleway as it crosses the eastern part of the appeal site.⁶⁹⁰ As a consequence, any relationship between the complex and the appeal site is not experienced from this aspect.
- 9.93 Other than the bridleway, no other footpaths cross the appeal site. At a gap in the conifer belt on the bridleway, there is a view towards Bloors Place. However, as demonstrated by the photographic evidence submitted,⁶⁹¹ and as I saw during my site visit, it is the white cowls on top of the Oast House building (an undesignated heritage asset) that can be seen in those views, as opposed to any meaningful appreciation of Bloors Place. Moreover, no key viewpoints from surrounding roads were drawn to my attention where Bloors Place is seen, or appreciated together with the appeal site. In essence, I did not find any relationship of the complex with the appeal site to be readily appreciable in the suggested context.
- 9.94 So, inasmuch as there would be some limited/intermittent intervisibility with the appeal site (albeit not to the extent suggested by Historic England) I consider that the appeal scheme would result in some, minor harm to the heritage significance of the grade II* listed Bloors Place and the grade II listed walls, but not the listed outbuildings. That harm would be less than substantial, at the lower end of that spectrum.

York Farmhouse (grade II): [6.131-6.136, 6.183, 7.100, 7.104(i), 7.106]

- 9.95 This former farmhouse comprises a two-storey timber framed dwelling with a plain tiled roof, dating from C16th with later additions and alterations. It is now converted to three cottages. Its outbuildings have also been converted to residential use. It lies close to the road frontage, behind a small fore garden,

⁶⁸⁶ Ms Wedd proof (CD10.7) paragraph 6.23

⁶⁸⁷ MS Stoten proof (CD10.2) paragraph 6.168

⁶⁸⁸ Letter dated 1 August 2019 (Appendix 6 to the proof of Ms Wedd)

⁶⁸⁹ See the short video clip appended to the LSoCG (CD11.3) The train passes the appeal site between 14-58 seconds (once past the footbridge at 14 seconds).

⁶⁹⁰ At seconds 33-44 on the video. See also photograph 40 in the evidence of Mr Etchells.

⁶⁹¹ Mr Hughes poof volume 2 photoviewpoint 14b (summer view) and Mr Etchells photo 27 (winter view)

and is located within the associated garden plots. Two large dwellings have been constructed to the rear of the listed building (between the listed building and the appeal site) which, together with their extensive grounds, are surrounded by woodland to the south and west, possibly planted to screen the nearby railway line.

- 9.96 The heritage significance of the building derives primarily from its built form, which has architectural, artistic and historic value. In my view, any significance now derived from its setting relates to its immediate rather than wider setting, its functional and visual relationship with the wider farmland having been severed as a consequence of the substantial new dwellings now constructed behind it, together with layers of domestic curtilage and the woodland planting referred to. Even in winter, that extensive planting and the intervening buildings mean that there is little if any vestigial intervisibility between the appeal site and the listed building.
- 9.97 The asset is no longer experienced in a way that is illustrative of the relationship it once had with the wider landscape, or indeed with any of the other heritage assets within the wider landscape. In particular in this regard, neither the appeal site, nor any of the other heritage assets, including Pump Farmhouse and the agricultural outbuildings at Bloors Place, are visible as a backdrop in any key views of the farmhouse. Moreover, there is no direct route between York farmhouse and the appeal site. Even when viewed from the elevated vantage point of the adjacent footbridge over the railway line,⁶⁹² whilst the appeal site can clearly be seen, intervening woodland means that there is little perception of York farmhouse having any remaining relationship with the appeal site, or indeed any of the other heritage assets.
- 9.98 Given that context, the changes to the landscape that would be a consequence of the development proposed would not materially harm the heritage significance of the former farmhouse through any change brought about to historic illustrative values. Neither would the development adversely affect the ability of the public to interpret its heritage significance, which is now best appreciated from the lane.
- 9.99 In terms of any contribution to significance by other, intangible qualities of setting, tranquillity makes no meaningful contribution in this instance – the building is converted into three cottages, it is surrounded by other dwellings, and lies in close proximity to the railway.

Pump Farmhouse (grade II): [6.137-6.143, 7.103i), 7.107]

- 9.100 Another former farmhouse now converted to a residence. It is located roughly mid-way along Pump Lane, at the centre of, but outwith, the appeal site. It comprises a two storey building of rendered brick with a tiled hipped roof, dating from the late C18th with later alterations and remodelling. Historically, it was surrounded by orchard and arable land. It is set back some distance from the lane, behind what is thought to have been the farm yard but is now a large domestic garden, with a well treed boundary to the road.

⁶⁹² Eg Mr Hughes proof volume 2 photoviewpoint 13 and Mr Etchells photo 1. See also Ms Stoten proof Plate 4 (page 13).

- 9.101 Russet Farm, a development of 24 modern dwellings, arranged as six close-knit terraces with modest gardens, and access roads, has been constructed around two sides of the former farmhouse, immediately to the west and south-west. In addition, a large modern outbuilding associated with the orchard has been erected nearby to the north. A former outbuilding/cottage to the south, between the farmhouse and Pump Lane, has been remodelled/rebuilt as a separate residence. Consequently, the immediate surroundings of the former farmhouse have comprehensively changed in form and character, with this group of built development forming a small residential enclave.
- 9.102 In my view, the heritage significance of the asset derives primarily from its built form, which has architectural, artistic and historic value. Its set back from the road, combined with the vegetated frontage, means that any contribution to that significance from its setting is principally derived from its associated garden plot, as opposed to its wider setting. Although Ms Wedd referred to views of Pump Farmhouse from Lower Rainham Road across the appeal site, through gaps in the roadside hedgerow, that was not apparent during the site visit. However, whilst its historic functional connection with the wider agricultural land has been severed, there is intervisibility in one view from the side elevation of the property to the northeast, across the appeal site to the Medway Estuary, where there is a notable absence of built form.⁶⁹³ Whilst that part of the site was not functionally related to the farmhouse historically,⁶⁹⁴ its current use as an orchard does, nevertheless, provide an experience of the listed building in a way that is illustrative of the relationship the asset once had with the wider landscape.
- 9.103 The illustrative masterplan shows a buffer of open space/planting to the northeast, between the asset and the proposed local centre, which would comprise buildings up to 10 metres in height. I appreciate that the development proposed would only be readily appreciated in that one view, but that is the only remaining view that allows for an appreciation of the asset in anything like its historic context. To my mind, that serves to heighten the importance of that relationship. That said, whilst there clearly would be some harm to the significance of the asset as a consequence of the development proposed, that harm would be less than substantial, towards the lower end of the range.
- 9.104 In terms of any contribution to significance by other, intangible qualities of setting, tranquillity makes no meaningful contribution in this instance, the farmhouse having been converted to a residence, with associated farm buildings etc having been replaced with 24 new dwellings in very close proximity.

Chapel House (grade II): [6.144-6.148, 6.163, 7.108]

- 9.105 Chapel House lies immediately adjacent to the northern extent of the appeal site. It dates from the mid-late C15th with later alterations. It has a timber frame with a rendered rear and weatherboarded left-hand end and a half-hipped tiled roof and left-hand hipped cross range. It has been subdivided to create two cottages.

⁶⁹³ See Ms Wedd Figure 9 (page 38 of her proof)

⁶⁹⁴ See Ms Stoten Plate 10 (page 22 of her proof)

- 9.106 The building is contained within its own land parcel that is larger than the historic curtilage - the original gardens have shifted from the south-west to the north-east of the building and further to the north-west. Although some of the land originally associated with Chapel House was located within the appeal site, that association has been severed and there is now no functional association between the appeal site and the heritage asset.
- 9.107 Its main, eastern façade fronts directly onto the northern end of Pump Lane, from where it is best appreciated, although it is also seen from Lower Rainham Road at the Pump Lane junction. The 1938 Tithe Map shows it apparently forming part of the then very loose-knit cluster of buildings along this part of Lower Rainham Road. Modern dwellings, constructed in the 1960s, lie immediately to the south-east of the asset, on the opposite side of the lane.
- 9.108 The rear of the listed building has some partially screened intervisibility with the appeal site. Filtered views of the appeal site are also co-visible with the asset from Lower Rainham Road, and the absence of built form within the appeal site is perceptible. From Pump Lane, co-visibility on the approach from the south is largely screened by roadside vegetation, although there are a couple of glimpsed, narrow aspect views in the immediate vicinity of Chapel House towards the site, beyond the garden areas.
- 9.109 The heritage significance of Chapel House is primarily derived from its built form, which has architectural, artistic and historic illustrative value, with any significance derived from its setting relating primarily to its immediate rather than wider setting. Its location as part of the settlement at Lower Rainham, albeit at the very eastern end, separated from it by Pump Lane, also has historic illustrative interest, as recognised by its inclusion within the Conservation Area. As two residences together, opposite modern residences and immediately fronting onto Pump Lane, close to its junction with Lower Rainham Road, it does not disclose any significant degree of tranquillity.
- 9.110 In my view, as part of the historic rural surrounds of Chapel House with which it has some intervisibility, and as an area which was part of the historic landholding of the asset, the land within the appeal site makes a minor contribution to the heritage significance of the asset. The appeal scheme would introduce new residential development up to 12 metres in height within around 80 metres of the asset, together with care/extra care accommodation up to 10 metres in height within around 50 metres.⁶⁹⁵
- 9.111 The character of the land, including some of the historically associated landholding would clearly alter, reducing the contribution of this area through historic illustrative interest. There would also be a corresponding increase activity levels in the wider vicinity. That said, the development would be set well back from the shared boundaries, behind an area shown on the illustrative plans as community orchard. Some views from and of the asset and its surrounds would change, and built form would be perceptible beyond the buffer in views from Lower Rainham Road and Pump Road.

⁶⁹⁵ Ms Wedd proof (CD10.7) paragraph 6.13 **INSPECTOR'S NOTE:** the height of the care accommodation referred to in the proof does not reflect the revised parameters plan (ID29)

- 9.112 Historic England identified harm as occurring to the heritage significance of the asset through increased vehicular movements during the construction phase at the adjacent road junction. However, the development scheme would not utilise Pump Lane as a main access. Rather, the main access to the site would be via a new junction off Lower Rainham Road, to the northeast of the listed building, separated from it by the proposed community orchard.
- 9.113 Overall, I consider that the proposed development would result in less than substantial harm to the heritage significance of the Grade II Listed Chapel House, through changes to its setting. That harm would, in my opinion, be towards the middle of that range.

Bloors Oasts (non-designated asset): [6.150, 6.158, 7.101, 7.116] ⁶⁹⁶

- 9.114 Bloors Oasts lies to the south-west of Bloors Place and its associated listed buildings, between them and the appeal site, and is located outwith Lower Rainham Conservation Area. It dates from the very late C19th and, as noted earlier, has been converted to use as a dwelling. Its modest heritage significance is derived principally from its built form and history, its historic functional links with the surrounding land, including the appeal site, having long since been severed. Any significance it derives from its setting is, in my view, confined to its immediate surroundings, including the surviving buildings of the Bloors Place complex referred to earlier.
- 9.115 There are some filtered views of the asset across the site from Lower Bloors Lane⁶⁹⁷ and from the bridleway, mainly through a gap in the conifer belt that bounds it for most of its length, although as noted earlier those latter views are of the white roof cowls in the distance, rather than of the main building itself.⁶⁹⁸ As such, any contribution made by the appeal site to the heritage significance of the building is modest at best.
- 9.116 Whilst the development proposed would not interrupt the relationship between the Oast House and the Bloors Place complex, as asserted by the Council, those views from and of the asset and its surrounds would change as a consequence of the appeal scheme, with built form up to 10 metres in height located within some 20 metres of the rear boundary of the property.⁶⁹⁹ I agree with both parties that any harm to the heritage significance of the asset would be limited/minor at most.⁷⁰⁰

Lower Rainham Conservation Area: [6.159-6.153, 7.69, 7.72, 7.103i) and iv), 7.111, 9.2]

- 9.117 No Conservation Area Appraisal is available for this Conservation Area to provide assistance in my consideration as to what determines its significance **and value, although Ms Wedd's evidence includes a pamphlet that sets out,** among other things, a brief explanation as to why it was designated.⁷⁰¹ It is a linear Conservation Area, located close to the north-eastern boundary of the

⁶⁹⁶ Also referred to in the evidence as The Oast House or the Oasts. **INSPECTOR'S NOTE:** The building is not identified on the Council's Historic Environment Records (HER) but there was no dispute that it should be treated as a non-designated heritage asset.

⁶⁹⁷ Eg Mr Etchells photo 10

⁶⁹⁸ Mr Hughes poof Volume 2 photoviewpoint 14b (summer view) and Mr Etchells photo 27 (winter view)

⁶⁹⁹ Ms Wedd proof paragraph 6.36 (page 20) **INSPECTOR'S NOTE:** the height of the residential development referred to in the proof does not reflect the revised parameters plan (ID29)

⁷⁰⁰ The Framework test of less than substantial only applies to *designated* heritage assets.

⁷⁰¹ Her Appendix 7

appeal site, encompassing the historic core of the village. It comprises a mixed collection of dwellings, including the Bloors Place complex and Chapel House⁷⁰² and a pub, most of which buildings front onto the main road, which is very narrow at this point.

- 9.118 Whilst Lower Rainham has been characterised as a traditional Kentish hamlet in its original setting, surrounded by orchards and with the river in the vicinity,⁷⁰³ there appear to have been very few farm complexes *within* the settlement. As such, whilst the historic core clearly had links to the wider landscape, that was largely through complexes such as Bloors Place that are now no longer used for agricultural purposes. In essence, any functional links with the surrounding countryside have been severed.
- 9.119 However, although the Conservation Area is generally inward looking, mainly experienced from the main road which it straddles, from where many of the historic buildings and their arrangement within the settlement can be appreciated, it also derives heritage significance from its setting. That setting allows for an understanding and appreciation of its significance, providing an historical context for the village, marking it as a small historically rural settlement. Indeed, that the settlement was designated as a Conservation Area appears to have been in part due to the rural environment within which the historic buildings are set.⁷⁰⁴ To the north, that setting comprises the salt marsh and Estuary; to the south, it comprises the western half of the appeal site which separates the village from the built edge of Twydall/Rainham. I do not agree with the appellant that the northern setting is somehow more important than, or has a stronger visual relationship with the settlement than that to the south – they are just different, each influencing the heritage significance of the Conservation Area in different ways.
- 9.120 The appeal site does not directly abut the southern boundary of the Conservation Area and I recognise that the development proposed would be set off the site boundaries allowing for some boundary planting. Even so, the appeal scheme would be clearly perceptible on approaches to the Conservation Area along Lower Bloors Lane and Pump Lane, and from the rear of properties on the southern side of Lower Rainham Road within the Conservation Area. There is also some seasonal intervisibility between the wider landscape and the rear of Bloors Place and Chapel House. I am in no doubt, in this regard, that replacing the historic landscape setting along the length of the southern side of the Conservation Area with new residential development and a school would have a marked and detrimental impact on the contribution that setting makes to the heritage significance of the Conservation Area. In essence, it would no longer be perceived as a separate small rural village related to its agricultural hinterland. Whilst the harm would, in the language of the Framework be less than substantial, I consider that harm to be very firmly towards the middle of that range.

Lower Twydall Conservation Area: [6.164-6.166, 7.70, 7.103(i)(iv)(v), 7.104(3), 7.112, 9.2]

⁷⁰² Neither York farmhouse nor Pump farmhouse lie within the conservation Area. Neither does the Oast House.

⁷⁰³ Ms Stoten proof paragraph 6.127 (page 64)

⁷⁰⁴ Pamphlet at Ms Wedd Appendix 7 (page79)

- 9.121 Again, no Conservation Area Appraisal is available for this Conservation Area. It is a linear Conservation area that lies adjacent to the western extent of the appeal site, at the southern end of Lower Twydall Lane. It encompasses the historic core of this small hamlet and contains a number of listed buildings, including York Farmhouse.
- 9.122 Whilst historically, three farm complexes were located here, the settlement has changed greatly through the residential conversion and/or rebuilding of several farm structures, together with the erection of new dwellings to the rear of York farmhouse, itself converted to three cottages, and the erection of 12 new dwellings at Little York Meadows (which lie outwith the Conservation Area). It now has an essentially residential, as opposed to agrarian character and is best experienced from the lane. Its heritage significance derives largely from the character and appearance of the historic street pattern, buildings and spaces within its boundaries. Although the Conservation Area is generally inward looking, mainly experienced from the lane which it straddles, it also derives some of its heritage significance from its rural setting, which comprises woodland, arable land and orchards, including the appeal site.
- 9.123 The appeal site adjoins the eastern edge of the Conservation Area at its southern end, with most of the site separated from the Conservation area by intervening agricultural land. At its closest, any intervisibility between the appeal site and the Conservation Area is only glimpsed, due to intervening mature vegetation at the rear of the curtilage plots. All in all, I agree with the Appellant that the development proposed, which would be set beyond a triangular landscape buffer (as shown on the illustrative plans) would result in less than substantial harm at the lower end of that scale.

Constellation of Assets and the Historic Landscape: [6.167-6.175, 7.98, 7.101-7.104, 7.117, 7.118, 8.37]

- 9.124 The Council contended that assessing the assets individually ignores significance of the historic landscape within which they lie which, in its view, should be treated as a non-designated asset in its own right and as a shared setting for the constellation of the other heritage assets referred to.
- 9.125 Historic England guidance⁷⁰⁵ advises that the context of a heritage asset describes any relationship between it and other heritage assets which is relevant to its significance, including functional relationships, with contextual relationships applying irrespective of distance, sometimes extending well **beyond what might be considered an asset's setting, and can include the** relationship of one heritage asset to another of the same period or function.
- 9.126 York farmhouse, Pump farmhouse and the outbuildings at Bloors Place would all have related to historical use of the surrounding land, including the appeal site, for agricultural purposes. However, there is no indication that they were linked functionally with each other, as demonstrated by the respective landholding maps in the evidence of Ms Stoten.⁷⁰⁶ The holding associated with Chapel House was also separate.⁷⁰⁷ There is no obvious intervisibility between those buildings that might otherwise link them, and the distance between

⁷⁰⁵ The Setting of Heritage Assets Good Practice Advice Note 3 – second edition (GPA3)

⁷⁰⁶ Plates 2, 10 and 28 respectively,

⁷⁰⁷ Plate 21

them, either across the appeal site or by road, does not provide any obvious appreciation of the buildings as some sort of related group to which group value might be ascribed. There is no reference in any of the list descriptions that refers to any group value. Neither do the buildings provide any identified waymarking function. In addition, only the Bloors Place outbuildings and Pump farmhouse date from a similar period, both York farmhouse and Chapel House being earlier in origin. All told, I am not persuaded that there is a meaningful interrelationship between these buildings in terms of their heritage significance that derives from the landscape between them.

9.127 As to the landscape itself, the Council described it as an historic north-south sequence of landscape and settlements, comprising:

- the River Medway and its sea defences and remnant wharves;
- estuarine mudflats and saltmarsh;
- Lower Rainham, built on the first solid geology that could carry buildings and the coastal road to Chatham;
- the open undeveloped farmland of the appeal site, with widely dispersed farmsteads and the hamlet of Lower Twydall;
- the railway line embankment which has provided a physical (and possibly psychological) barrier to development; and,
- the suburban development to the south of the railway.

9.128 Landscapes can clearly comprise heritage assets. Indeed, landscapes are cited as an example in the Framework definition of heritage assets. However, the definition sets out that it must have *heritage* interest.

9.129 Whilst the landscape sequence can be seen from the various aerial photographs of the site,⁷⁰⁸ no identifiable, intrinsic heritage value is readily apparent that might merit its designation as a non-designated asset, so allowing it to be considered properly as such in the planning process. It does **not feature, for instance, in the Council's HER. Moreover**, until the related discussion at the Inquiry, no thought had been given as to exactly where the **boundaries of the 'asset' might lie in order to be able to quantify any impact** upon its significance or its setting. Initially it was suggested that it related to the red line of the appeal site, but during the discussion that was then extended to encompass the land between Lower Bloors Lane and Lower Twydall Lane, the railway and the Estuary, with the appeal site forming the substantive part of that.

9.130 **Ms Wedd held that the 'story' told by the landscape sequence was the last** remaining such sequence on this part of the Medway Estuary, explaining how the sparse scattered settlements and buildings came about. Be that as it may, that seems to me to essentially be a landscape character consideration as opposed to imbuing it with more than remote and ephemeral *heritage* interest. The heritage assets referred to above sit within that landscape and would have been informed by it, but I have had regard to their setting in my consideration of each of the assets individually. The distance between them does not make

⁷⁰⁸ Eg ID3

a meaningful contribution to, or somehow amplify their heritage significance. On that basis, I consider that the historic landscape does not, in this instance, comprise a non-designated heritage asset and I have not treated it as such.

Conclusion on Heritage Assets

- 9.131 For the reasons set out above, I have found that there would be no harm to the heritage significance of York farmhouse, or the listed outbuildings within the Bloors Place complex. I consider that the harm to Pump farmhouse, Bloors Place, the listed walls and Lower Twydall Conservation Area would be at the lower end of the less than substantial range, with the harm to Chapel House and Lower Rainham Conservation Area in the middle of the spectrum. I have found very limited/minor harm to the non-designated asset that is the Oasts.
- 9.132 As set out above, I do not agree with the Council that the historic landscape here merits treating as a non-designated heritage asset. Should the Secretary of State come to a different conclusion, any harm to its significance would also need to be taken into account in determining the planning application as part of the overall planning balance.
- 9.133 In light of the forgoing, I consider that there would be conflict with policies BNE14 and BNE18, in that the development scheme would not preserve or enhance the setting of the two Conservation Areas and would adversely impact the setting of various listed buildings with consequent harm to their special interest and heritage significance. Paragraph 196 of the Framework requires that such harm be weighed against the public benefits of the scheme. Paragraph 197 requires the harm to the non-designated asset be taken into account. I return to these matters in my overall planning balance below.

Agricultural Land^[6.29, 6.35, 6.264-6.315, 6.328, 6.339, 6.340, 7.74-7.93, 7.230, 7.236, 7.237, 8.7, 8.19, 8.23, 8.47, 9.1]⁷⁰⁹

- 9.134 The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into subgrades 3a and 3b. The Framework defines Grade 1, 2 and 3a land as the best and most versatile (BMV) land. Natural England confirms that BMV land is *'the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.'*⁷¹⁰
- 9.135 Around 96% of the appeal site is classified as either Grade 1 (excellent quality) or Grade 2 (very good quality), with the remainder comprising grade 3a (good to moderate quality).⁷¹¹ It is a matter of common ground in this regard, that the appeal scheme would result in the loss of 51.5 hectares of BMV land, currently in use by the Appellant as apple orchards (with a cropping area of around 43 hectares).^[6.280]
- 9.136 There are no current development plan policies relating to agricultural land and so national policy and guidance form the principal consideration.^[6.264] Paragraph 170 of the Framework requires that planning decisions should

⁷⁰⁹ See also CD6.6, CD6.11, CDs7.7-7.9, CD8.3 Appendices 13.1 and 13.2, CD8.4 Appendix 13.2(i) together with the proofs of Mr Pelham for the Appellant (CD10.5 and CD10.14) and Mr Lloyd Hughes for the Council (CD10.5) and the Agricultural SoCG (ASoCG) (CD11.5)

⁷¹⁰ Natural England Technical Information Note TIN049, p2 (CD7.8)

⁷¹¹ Agricultural SoCG (CD11.5) and Mr Pelham proof (CD10.5) paragraph 2.11

contribute to and enhance the natural environment by protecting and enhancing soils and recognising the wider benefits from natural capital and ecosystem services, including the economic and other benefits of BMV land.

- 9.137 **The Appellant's case was** that the BMV status of the land does not reflect site specific, physical characteristics of the site. To that end, it was argued that no **'reasonable' profit**^[6.295] could be derived from agricultural/ horticultural use of the land, including non-food crops.^[6.270-6.276, 6.295]
- 9.138 I agree with the Council that on the face of it, the contention that more than **50 hectares of BMV land cannot achieve a 'reasonable' profit, either by itself as** a free standing enterprise, or as a satellite as part of a larger enterprise, is unexpected. Indeed, neither of the professional agricultural witnesses had come across such argument before. That is not to say, however, that that may not be the case in this instance, with each case falling to be determined on its own particular merits.^[7.78]
- 9.139 A C Goatham and Sons (Goathams) is one of the largest growers of apples and pears in the UK,⁷¹² currently farming over 2,400 acres of land^[7.79] on a hub and satellite model,⁷¹³ all for top fruit (apples and pears) producing around 350 million apples a year and 55 million pears.^[7.79(1)] This is a large, long established company, with over 67 years of experience of fruit growing in this part of the country.
- 9.140 The Appellant purchased Pump farm in 2011.^[7.79(2i)] As experienced large-scale growers, the company would have been well aware of matters such as: the distance and nature of the routes between the site and the relevant hub farm,⁷¹⁴ as well as between the site and the processing and storage facilities at Flanders Farm, Hoo; the age, alignment and sizes of the various orchard blocks; the change in ground level levels at the northern end of Blocks 15/16 on the Pump farm side;⁷¹⁵ and local weather conditions, including hail incidents, all matters that are now relied on in arguing that the site is no longer viable.^[6.296-6.299, 6.308, 7.79iv), 7.78] Moreover, after purchasing the Pump farm site, the Appellant invested by replanting orchard blocks there twice (4.45 hectares in 2011 and a similar area again in 2017)^[7.79(2ii)] which costs would not have been insignificant.
- 9.141 **The company's confidence in the orchards here is also evidenced by its** purchase of the Bloors farm land (comprising the eastern half of the appeal site) in 2016,^[7.79(2iii)] having had five years of experience cropping the Pump farm land on the opposite side of Pump Lane. Had the orchards on the Pump **farm side been operating at a loss (or making below Mr Pelham's 'reasonable' profit level)** and/or not thought to be capable of continuing to make a profit because of the reasons now relied on, the commercial sense in purchasing the additional orchard land at Bloors farm is brought into question, particularly given that: the distance and nature of the routes between the site and the relevant hub/packing facility would have been similar; the age, size and alignment of the orchard blocks would have been known; where it was known **on the Appellant's own evidence that there had been hail incidents at the Pump**

⁷¹² Mr Lloyd Hughes Appendix RH08 page 11 of the supporting planning statement in relation to Gore Farm.

⁷¹³ Four of the farms are hubs, with the remainder, including the appeal site, being satellites

⁷¹⁴ The base from which machinery etc would be sent to work on Pump farm orchards

⁷¹⁵ See ID5

farm site in the three years preceding the Bloors farm purchase, which included the worst recorded year (2014);⁷¹⁶ and where the presence of the bridleway which crosses the land, dividing it into two, would have been known. Again, all matters that are now said to make the site unviable.

- 9.142 Given the experience of the Appellant in growing apples in this area, it seems anomalous to me that the company would have purchased these farms if cropping them as orchards was not considered to be a viable proposition. I am mindful in this regard, that the planning application now the subject of this appeal was made in June 2019, just three years after purchase of the Bloors farm land, just two years after replanting 4.45 hectares of orchards on the Pump farm land. Nothing has changed on the ground, as it were, in terms of the physical characteristics of the appeal site, its surroundings, or the local weather, since being purchased by the appellant.
- 9.143 I also understand that the company has, as recently as 2020, invested in Gore farm, located some 3 miles from the appeal site, including its continued use as orchards to support what it described as the ongoing expansion and improved efficiency of the business. As noted by the Council, it is a satellite farm growing Gala and Braeburn apples, among others. It is also of similar overall size, cropping area and yield as the appeal site, with similar small orchard block sizes (in part).^[7.79(3)]
- 9.144 Notwithstanding that the burden of proof is on the Appellant to prove its case non-profitability, no accounts relating to the appeal site were available to the **Inquiry (nor even to the Council's agricultural witness on a confidential basis)** on the grounds of commercial sensitivity. I was advised that even if they had, since the Appellant has dispersed groups of orchards it would not be possible to identify site specific profit because a significant proportion of the costs associated with those sites are central costs (such as a central packhouse, central storage, central management and other labour, and administration) borne by the business in respect of all of the sites - they are not site specific. Mr Pelham agreed (in evidence in chief) that there were some economies of scale to be had in these regards.
- 9.145 If it is not possible to identify whether a particular site is profitable, that begs the question of how to tell if it is not profitable. Mr Pelham confirmed that although he had not been asked to undertake any assessment of the profitability of the appeal site as part of the larger enterprise he had a suspicion, based on his own experience, that the site had not produced any profit over the last ten years although, absent the relevant analysis, he could not be confident about that.^[7.86] Were that the case, that again begs the question as to why the Bloors farm site was purchased just five years ago.
- 9.146 Relying again on his own experience, combined with data that Goathams was able to let him have sight of (but which could not be shared with the Inquiry)^[6.287] Mr Pelham produced a theoretical lifetime financial model for a 2024 orchard replanting of a Gala dessert apple crop, using a coloured clone such Royal Beaut, across a site the same size as the appeal site, with the same soil quality and with the new trees all planted on a north-south alignment.^{[6.286-}

⁷¹⁶ Table 1 in the proof of Mr Pelham (page 10) informed by Goathams.

6.295, 6.298, 7.87-7.88] 717 That indicates that excluding hail damage, and with the price of apples remaining static (a position contested by the Council) the orchards would return a lifetime profit of 2.39% of turnover.^[6.294, 6.295] Once hail damage is taken in to account, the model shows that the theoretical site would return a loss.^[6.298]

9.147 However, and if nothing else, that treats the site in isolation and seems to me to miss the benefits that accrue from the site being a part of the larger Goathams portfolio. In discussing the economic viability of this site, much was made of the prevalence of hail damage to crops, with reference to an average annual crop loss of 10.4% over the last nine years on the appeal site (based on Goathams evidence to Mr Pelham).⁷¹⁸ There was no suggestion in this regard, that the appeal site is any more (or less) susceptible to hail than any other of the Kent orchards run/managed by the company. In the absence of any evidence to the contrary, I have no reason to suppose that similar hail **damage would not also be a feature at the Appellant's other farms (other than perhaps where hail netting might be employed).** On that basis, absent any protection, it seems to me that the Appellant must accept annual losses across its orchard portfolio as a consequence of hail damage.

9.148 **In essence, in any given year, some 'random' sites within the Goathams group may suffer from hail damage but, as part and parcel of a larger group of satellite farms, any losses sustained on those individual sites in any one year would, in the bigger picture, be compensated for by the ongoing profits from unaffected sites that same year as part and parcel of the company's ongoing operations.** In other years, other sites may, or may not sustain such damage. Whilst an individual site may, in any one year, not make a profit because of hail damage it may not, given the random, variable and very localised nature of hail events, suffer that damage in other years when other sites in the **'family' might. This seems to me to be a symbiotic relationship, where the whole of the group, in terms of viability, is greater than the sum of its parts.**

9.149 In relation to apple prices, the Council referred me to data published by DEFRA concerning past and current trends.⁷¹⁹ **That shows a rise in 'farm-gate' sale prices of some 3.33% (compound interest rate) for the period 2010-2019 for dessert apples in general.**⁷²⁰ In addition, the DEFRA evidence indicates that the weekly wholesale prices (ie not adjusted for farm-gate sales) for Gala apples have increased by some 5.12% between October 2011 and October 2020. I am mindful, in this regard that Goathams deal directly with the supermarkets. Either way, these are the only empirical figures before the Inquiry on this matter. Whilst the Appellant sought to portray these figures as being generally static,^[6.305] I do not agree. I recognise that there is some variation year on year, with some years showing a decrease from the year before. Overall however, on the evidence that is before me, the average farm gate price per tonne for dessert apples has increased from £533 to £607

⁷¹⁷ See also Mr Pelham proof paragraphs 6.1- 6.13 and his Appendices 5 and 6

⁷¹⁸ Mr Pelham proof Table 1 (page 10) and paragraphs 3.16-3.22 and paragraph 6.9. This refers to incidents of hail in five out of the nine seasons that Goathams has been in occupation of the land (2012-2020).

⁷¹⁹ Mr Lloyd Hughes Appendix RH07. The DEFRA Horticulture Statistics 2019. These statistics cover area, production, value, imports and exports of horticulture crops from 1985 to 2019. (CD7.9)

⁷²⁰ Mr Lloyd Hughes Appendix RH07 Table 6 **INSPECTOR'S NOTE:** ID48 confirms that the dataset that supports these figures has been adjusted to reflect 'farm-gate' prices. The Gala apples wholesale average price and prices chart 2010-2020 are not so adjusted.

(2011-2018). I am mindful, in this regard, that Gala apples only feature in those statistics for 2016, 2017 and 2018. It is over those three years that the prices started rising after a dip (although I recognise that there was slight drop in 2017).

- 9.150 On the evidence of the Council, were the static sale price of Gala apples in the lifetime cropping model to be replaced with a 2% annual price rise (reflecting the historic rise in dessert apples generally referred to above) then, even allowing for 10.4% hail damage, the model shows a lifetime profit in the region of £89,634, which represents a **'reasonable' profit as a percentage of a turnover of £749,983.**^[7.87(3vi)] ⁷²¹ Even a price rise of 0.6% per annum, well below the average historic price rise for dessert apples referred to above) would still return a reasonable profit as a percentage of turnover.^[7.87(3vi)]
- 9.151 Mr Pelham also looked at the suitability of the appeal site for other enterprises none of which, in his experience, could realise a reasonable profit. These included other tree fruit and soft fruit, field vegetables and salad crops, cereals and potatoes, hops, livestock, non-food crops (biomass and pharmaceutical crops). That evidence was not robustly challenged by the Council (on the basis that in its view, continued intensive orchard use of the land could return a profit) other than to point out that the reference to the **price of vermin proof fencing around the site would, on the appellant's figures,** be some £35,00-£45,00 as opposed to £350,000-£450,000 as referred to by Mr Pelham,⁷²² casting some doubt on the accuracy of his forecasting in that regard. For the most part though, the evidence before me on this was very generalised, including little in the way of any actual costed figures relating to the introduction of other uses on this particular site.

Conclusion on Agricultural Land

- 9.152 Based on DEFRA figures, there are over 90,000 hectares of BMV land in Kent.⁷²³ Nevertheless, I am in no doubt that the loss of more than 50 hectares of such land, which would be a consequence of the development proposed, is a significant matter, particularly given that such land is a finite resource. However, the Framework does not advocate against the loss of such land. Rather it indicates that its economic and other benefits be recognised.
- 9.153 In this case, the evidence that was before the Inquiry indicates to me, that even if the site is not capable of returning a reasonable profit were it to be put to any other agricultural/horticultural or related uses I have found that, on the evidence before me, there is good prospect for the land to be farmed in such a way that it realises a reasonable profit. That is a matter that will need weighing in the overall planning balance.
- 9.154 Should the Secretary of State consider that there is no reasonable profit that can be made from this significant area of BMV land, that too would need weighing in the overall planning balance.

⁷²¹ Mr Lloyd Hughes Rebuttal proof (CD10.17)

⁷²² Mr Pelham proof paragraph 7.18

⁷²³ Mr Pelham proof paragraph 8.13

Highways[6.185-6.263, 6.332-6.3336, 7.119-7.199, 7.228, 8.14, 8.15, 8.20-8.22, 8.27-8.35, 9.1, 9.2] 724

- 9.155 Local Plan policy T1 is permissive of new development proposals where, among other things, the highway has adequate capacity to take the additional traffic and where they would not add significantly to the risk of road traffic accidents. In addition paragraph 108c) of the Framework seeks to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree. Paragraph 109 goes on to confirm that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 9.156 There was no agreement as to what might comprise the highway/highway network for the application of policy T1 or the Framework policies. The Appellant suggested that they require consideration to be given to the impact of the development over the whole of the Medway authority area, as opposed to parts of the network, with the Council taking a more focussed approach.
- 9.157 **The Local Plan gives no indication as to what comprises the 'highway' in terms of the extent of the area over which consideration is to be given to implementation of the policy. Neither is there anything in the Framework to define what might comprise the extent of the 'transport network, or the 'road network,' nor indeed is there any quantification or threshold as to what may comprise a 'severe' impact to assess at what point, if any, an increase in congestion would amount to a severe residual cumulative impact. That seems to me to allow for site specific circumstances to inform matters on a case by case basis. Had those drafting the policy and the Framework intended the considerations to apply to a specific area, it surely would have said so.**
- 9.158 In this case, I see no reason why the reference to capacity in policy T1 should relate necessarily to the impact of a development on the capacity of every single part of the district-wide highway network, when the traffic impacts of a development are most likely to be felt closest to the source. The same goes in relation to the application of paragraphs 108 and 109 of the Framework. That effects may only be felt over a small part of the network does not mean, in my view, that they cannot also be severe. Indeed, it is hard to imagine anything other perhaps than a new settlement, or the cumulative effect of housing growth in a Local Plan being of a scale to potentially to trigger the threshold of severity referred to in the Framework over an Authority-wide area. None of the appeal decisions dealing with the matter of severity of impact in highways terms that were brought to the attention of the Inquiry dealt with the impact over **the entirety of an Authority's network.**⁷²⁵ I am content, in this regard, that it is appropriate to focus on the areas of greatest potential traffic impact in order to assess the scheme against the relevant policies.
- 9.159 Figure 1 in the Final Transport Assessment provides a useful map of the local road network.⁷²⁶ In brief, the appeal site straddles Pump Lane which runs north to south between the B2004 Lower Rainham Road and Beechings Way

⁷²⁴ See also eg the proofs of Mr Tucker for the Appellant (CD10.4, CD10.13, ID36) and for the Council, the proofs of Mr Jarvis (CD10.10, CD10.16 and ID52) and Mr Rand (CD10.9, ID35)

⁷²⁵ Eg CDs 4.8 and 4.14 Also Appendix B to the proof of Mr Rand

⁷²⁶ CD8.3 Appendix 10.1

respectively. To the east, as the B2004 enters Lower Rainham, where the width of the single carriageway enters a pinch-point, the route through the village is managed by a series of traffic light controls, incorporating shuttle working and build-outs. To the west, the B2004 runs to a roundabout junction with Yokosuka Way (which links the roundabout to the A2 to the south) and the A289 Gads Hill to the north west.

9.160 To the south, Pump Lane passes under the rail line, where the carriageway narrows and shuttle working for two-way car passage is exercised, before joining Beechings Way where, via a staggered junction, it continues southwards to the A2 London Road. Beechings Way is an important local distributor road providing access to a number of residential streets within the local vicinity, connecting the eastern edge of Gillingham with the A2 corridor. With limited options for crossing the River Medway, the A2 and the A289 are two of the key east-west arterial routes in Medway. Together with other A roads in the locality, they form the principle road network within the area, also servicing the M2 and M20.

9.161 The local highway network, including key arterial routes, is already heavily congested, particularly during the AM and PM peaks.^{[6.336, 7.119, 7.140, 7.167, 7.172,}

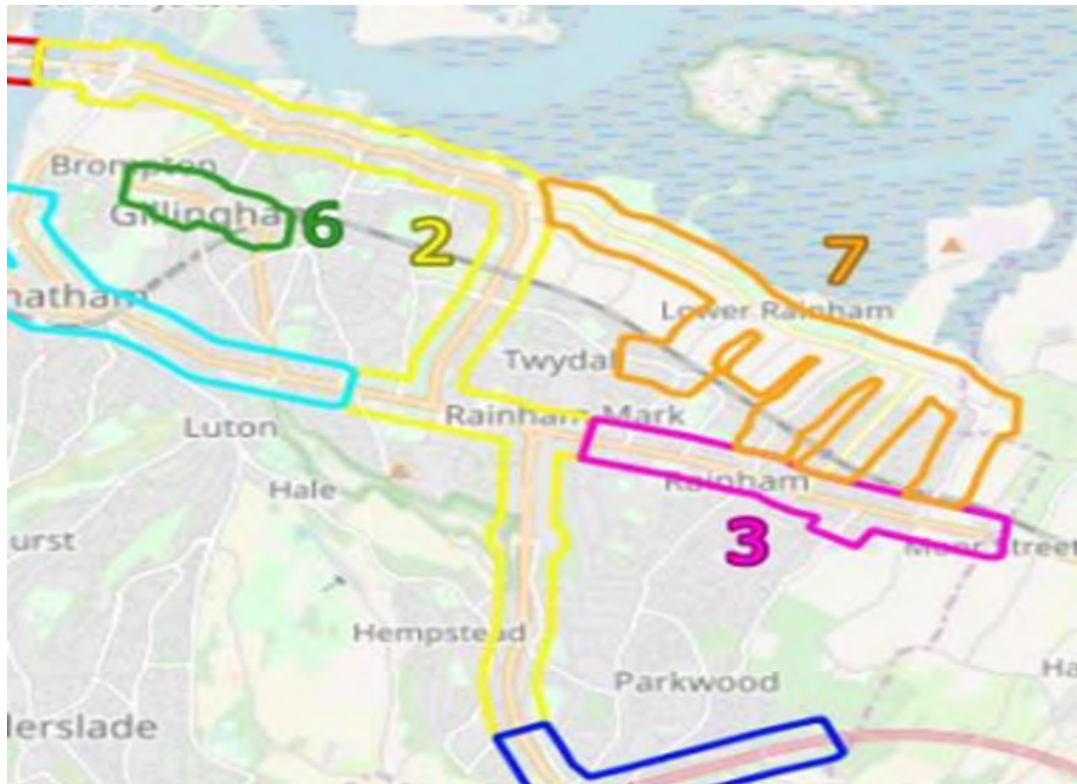
7.177, 8.14, 8.20, 8.27, 8.30, 8.35, 8.40, 9.2]

In support of the proposal, the Appellant proposed a number of mitigation works, as amended during the Inquiry, comprising:

- Lower Rainham Road/Yokosuka Way/Gads Hill roundabout: widening of the eastern, Lower Rainham Road approach to provide a two-lane entry with kerb realignments on the southern side of the road and associated amendments to the central splitter island, plus appropriate destination markings to allow for two lanes of right-turning traffic from the eastern arm (Dwg No 20230-10 Rev B)
- A2/Will Adams Way/Ito Way roundabout: revised lane markings to accommodate three lanes of traffic on the southern circulatory carriageway (Dwg No 20230-18B).
- Bloors Lane/A2 London Road/Playfootball signalised junction: additional ahead lane on the eastbound approach (Dwg No 20230-09 Rev A).
- Bowaters Roundabout: reconfiguration of the Toucan crossing to the east of the roundabout to include staggered refuge island, revised signal timings and additional lane capacity on the roundabout through new lane markings (Dwg No 20230-17B).
- Otterham Quay Lane/Meresborough Road/A2 signalised junction: revised timings.
- Pump Lane rail underbridge: revised signal shuttle arrangement (Dwg No 20230-05-1F).

9.162 There are two competing appraisals before the Inquiry that deal with traffic impacts. The Council assessed highways impacts through the use of its strategic Medway Aimsum Model (MAM),⁷²⁷ which consists of eight main sub-networks covering the whole local authority area, operating at macroscopic

and microscopic levels simultaneously. The modelling assessment undertaken in relation to the appeal scheme analyses the impact of the development on the three subnetworks closest to the site, (subnetworks 2, 3 and 7)⁷²⁸ including the mitigation measures referred to above. The appeal site lies within subnetwork 7.



- 9.163 The Appellant's assessment is based on isolated junction modelling (using ARCADY and LinSig)⁷²⁹ at locations where it is predicted that the most significant traffic impacts are likely to be felt, informed by the Council's sub-networks and MAM outputs.
- 9.164 In terms of inputs to the models, the Council contends that there would be around an additional 800 two-way trips on the highway network in both the AM and PM peaks (around 13 additional trips every minute). The Appellant's figures, derived from the TRICS database, suggest an additional 585 two-way movements during the AM peak, with an additional 558 two-way movements during the PM peak⁷³⁰ (around 9.5 additional trips every minute).⁷³¹ To assist the Inquiry, the Council ran its model using the appellant's trip rates (scenario 6a in the evidence) and presented its case on that basis. Other inputs to both models, including committed development, TEMPRO growth forecasts and future forecast years were all agreed.
- 9.165 The results of each assessment are significantly different. Simply put, if the Appellant's modelling outputs are to be preferred which suggests that, with the proposed mitigation, none of the modelled junctions would be operating over

⁷²⁸ Figure 1 in the proof of Mr Rand

⁷²⁹ ARCADY is an industry tool used to model the capacity of roundabout junctions. LinSig is used to model the capacity of signalised junctions.

⁷³⁰ *ibid* Section 5 Table 30 (page 36)

⁷³¹ See Technical Note 2 (CD6.7)

capacity, then the conclusion would be that any residual cumulative impacts on **the road network would not be severe. If the Council's outputs are preferred**, then even with the mitigation measures proposed, the residual cumulative impacts would, in its view, be severe

- 9.166 Both models are very different and assess different aspects of the highway network and the way in which it functions. A significant amount of the highways evidence, and the related time at the Inquiry, was spent on the merits and deficiencies of each modelling approach. Needless to say, each party highlighted the benefits of its own preferred modelling and the shortcomings and apparent anomalies in terms of validation/calibration and **outputs of the other's. It is necessary however, to come to a view as to which** approach should be preferred in this case.
- 9.167 In general, it seems to me that in focussing on isolated junctions, the evidence of the Appellant may not have fully embraced the complexity of the already congested highway network around the site.⁷³² That is particularly important in this instance, given strategic scale of the development proposed and the interaction of the junctions and the links between them. The MAM, in principle at least, enables an assessment of the complex traffic interactions of this large and congested urban area, taking account of a range of effects that arise not only at several junctions but also, importantly, key routes. By their very nature, isolated, junction assessments cannot account for such matters on that holistic scale.⁷³³
- 9.168 Taking just a couple of examples: the MAM allows for congestion and travel times in some areas causing drivers to redistribute across the network. Whilst the Appellant suggested that this is dealt with in Technical Note 3 (TN3)⁷³⁴ it is not readily apparent from the Note how those diversionary impacts have been **accounted for in the Appellant's modelling. The MAM also takes account of** individual driver behaviour such as lane changing and individual acceleration/deceleration, as well as link capacity issues, including any blocking-back at junctions which may affect the performance of the links and other junctions on the travel corridors, and thus the capacity of that part of the network. I agree with the Council that this is a phenomenon which is particularly evident in urban areas, where a network is already congested and where there are multiple junctions in close proximity.^[7.172] A further example, explored in more detail below, relates to the mitigation measures proposed for the Lower Rainham Road approach to the A289 Gads Hill/Yokosuka roundabout. Whilst the mitigation reduced impacts on Lower Rainham Road to less than severe, it had a significant knock-on effect for traffic on the northbound Yokosuka Way approach which was not accounted for.

⁷³² The junctions modelled by the Appellant comprised the Lower Rainham Road/Yokosuka Way/Gads Hill roundabout, Beechings Way/Yokosuka Way/Cornwallis Avenue/Ito Way roundabout, Will Adams roundabout, Bowaters roundabout, Pump Lane/A2 junction, Bloors Lane/A2/Playfootball junction, the two Beechings Way/Pump Lane junctions, Lower Rainham Road/proposed site access junction and the proposed Pump Lane underbridge shuttle. (see eg TN4 (CD12.6))

⁷³³ Table 2 of Mr Jarvis original proof (CD10.10) identifies the links, junctions and routes close to the development site that were calibrated and validated in the MAM. In addition to the above, the MAM looked at Otterham Quay Lane/Meresborough Road junction, plus link counts on Lower Rainham Road, Sovereign Boulevard (A2), London Road (A2) Ito Way, Hoath Way, Yokosuka Way, Pier Road/Gads Hill, and route travel times on the A2 and the A289/A278. ⁷³⁴ CD6.11

- 9.169 **It was also confirmed during the Inquiry that the Appellant's own traffic** surveys stopped counting when a queue extended back through the next junction and/or reached 15. That seems to me to confirm that this is already a problem on this part of the network. Even with the mitigation measures **proposed, the Council's microsimulation videos suggest** that there would be a deterioration in journey times and network statistics, caused by a combination of the junctions being overcapacity combined with link capacity issues. This is particularly true on the A2 corridor where there are a number of potential causes of delays on the links. The isolated junction models do not account for that wider linked effect.
- 9.170 **The Appellant's evidence suggested that as its modelling did not show any of** the junctions to be operating over capacity (based on volume/capacity sections showing that none of the modelled junctions would be operating at over 90%) then none would cause queuing which would block back along a link and/or through another junction.^[1] However, it does not take account queuing at other interacting junctions that were not modelled - the MAM model looks at the interaction of all the junctions within any subnetwork and the interaction of their performance with each other. Moreover, as is clear from the microsimulation videos, queuing and blocking-back can also be affected by other features on the links between junctions, although I appreciate that such effects are more transient. I am mindful, in this regard that, as confirmed during the Inquiry, **the Appellant's own traffic surveys stopped counting when** a queue extended back through the next junction and/or reached 15.
- 9.171 **Even with the mitigation measures proposed, the Council's microsimulation** videos suggest that there would be a deterioration in journey times and network statistics caused by a combination of the junctions being overcapacity combined with link capacity issues. This is particularly true on the A2 corridor where there are a number of potential causes of delays on the links. The isolated junction models do not account for that wider linked effect.
- 9.172 In my view, the complex inter-relationship of the various components of the network are not fully tested in the isolated junction modelling approach. Therefore, whilst recognising that there are some apparently anomalous outputs from the MAM I tend, on balance, towards the more holistic approach **that informs the Council's evidence on this.**
- 9.173 I turn now to the predicted effects on the identified subnetworks based on the **Council's modelling. In essence, and noting that the identified impacts are based on the Appellant's trip generation figures which are lower than those** suggested by the Council) the model outputs indicate the following:
- 9.174 Subnetwork 2: this is the largest of the three subnetworks, principally comprising the A289, A2 and A278, being the main urban strategic distributor roads (all dual carriageway). Even in the 2028 reference case, two of the junctions within that subnetwork, including the Lower Rainham Road/Yokosuka Way roundabout, would be over capacity, both exceeding by some margin the highest level of saturation (LoS) rating of F (alternatively a RFC (ratio of flow to capacity) of more than 1) which can be equated to a severe residual impact. With the appeal scheme, the MAM indicates that in the AM peak, three further

^[1] XIC Mr Tucker

junctions would operate over capacity, including the key Will Adams and Bowaters roundabouts on the A2, exceeding an LoS F rating. In the PM peak, four junctions, including Bowaters, would operate over capacity.

- 9.175 Journey times would also increase significantly from the 2028 reference case. Westbound journey times would increase by over 5 minutes (80%) in the AM and PM peaks, with eastbound journey times increasing by over 10 minutes (89%) in the AM and over 8 minutes (119%) in the PM peaks, giving rise to journey times for a 3.3km stretch of the A2 of around 12 minutes heading westbound in both peaks, over 21 minutes heading eastbound in the AM peak and over 15 minutes heading eastbound in the PM peak. Journey times on the A289 are also significantly worsened, with an increase in journey times of between 27%-100% when compared with the 2028 reference case.
- 9.176 The impact of the development is also felt on the overall network statistics, with travel times increasing in the AM peak by 23% relative to the reference case (from 3.2 minutes to almost 4 minutes in terms of minutes per km); delays increasing by 38% (from almost 2 minutes to 2.75 minutes in terms of minutes per km); and mean queues by 73% (from 489 vehicles to 846). Similar increases are experienced in the PM peak.
- 9.177 The latest iteration of proposed mitigation for the Lower Rainham Road/Yokosuka Way/Pier Road roundabout allows for two lanes of westbound traffic on the Lower Rainham Road (which lies within subnetwork 7) to turn right onto the A289. The Council accepted that this would reduce queuing on Lower Rainham Road to less than severe.^{[.242]735} However, the originally modelled impacts (which were severe) would shift to the southern A289 arm of **the roundabout, which forms part of subnetwork 2. The Council's evidence**⁷³⁶ predicts a lengthy queue on the northern approach of the A289/Yokosuka Way, which has implications for travel times on that link. For instance, in the 2028 reference case, the journey from the A278 (Hoath Way) to the Church Street roundabout on the A289 (Pier Road) which traffic uses the northbound approach to the A289/Yokosuka Way roundabout – a journey of approximately 5km – would take just over 10 minutes. That would increase to some 19 minutes and 31 seconds with the now proposed mitigation in place,⁷³⁷ with the junction performance being classified as having an LoS rating of F, equating to a severe residual impact
- 9.178 Based on those statistics and being mindful that, importantly, this network incorporates two of the key arterial routes in the local highway network, I am in no doubt that the residual cumulative impacts on this subnetwork would be severe.
- 9.179 Subnetwork 3: this is the smallest of the three networks, comprising a roughly 3km stretch of the A2 between Bowaters roundabout to a point past Otterham Quay Lane. Other than a short stretch between Bloors Lane and Century Road, this is a single carriageway route. The MAM indicates that whilst the proposed mitigation would in fact improve journey times on this part of the A2, there would be a knock-on effect, transferring delays to the side

⁷³⁵ Mr Rand EIC

⁷³⁶ Mr Jarvis Addendum proof (ID52) Figure 12

⁷³⁷ *ibid* paragraph 4.7

roads, including Meresborough Road and Moor Park Close. The A2/Otterham Quay Lane/Meresborough Road junction would operate over capacity in both peaks, with the delays at the junction being particularly extensive in the PM peak.

- 9.180 However, among other things, the Appellant took particular issue with the statistics for the Meresborough Road and Moor Park Close arm. Whilst Moor Park Close, which serves approximately 80 dwellings,⁷³⁸ contains numerous short cul-de-sac offshoots, it has direct access onto both the A2 and Meresborough Road, by-passing the traffic light controlled A2/Otterham Quay Lane/ Meresborough Road junction. It is not, of itself, a cul-de-sac⁷³⁹ as suggested by the Appellant. That said, I agree with the Appellant that the **Council's figure of 300 associated traffic movements as suggested in the 2028** reference case seems, on a common sense approach, to be excessive, given the number of dwellings, noting that west and southbound traffic from the Close can avoid the junction altogether, and noting that Meresborough Road does not link to any significant residential areas.
- 9.181 Mr Jarvis sought to explain this by a Note to the Inquiry.⁷⁴⁰ However, whilst that confirms that the MAM does not model the link as a cul-de-sac, it was not clear why traffic associated from other development within the relevant centroid is also modelled as using Moor Park Close/Meresborough Road, when there is no direct link between them.
- 9.182 In any event, the most significant point in relation to this subnetwork to my mind, is that the mitigation measures would mean that journey times on the A2 would be improved. Whilst queuing may, as a consequence of that, increase on the Moor Park Close/Meresborough Road arm of the junction, sufficient doubt is cast over the relevant figures for that arm of the junction and I have not taken the residual cumulative impact identified for that arm to be severe.
- 9.183 Subnetwork 7: this includes that part of the B2004 Lower Rainham Road between the Lower Rainham Road/Yokosuka Way/Gads Hill roundabout to the west and Otterham Quay Lane to east, together with Pump Lane, Lower Bloors Lane, Berengrave Lane, Station Road and Otterham Quay Lane. The MAM identified the main problem within this network to be westbound traffic (towards Gillingham, Chatham and the Medway crossing) in the AM peak.
- 9.184 The modelling suggests that, as a consequence of the development proposed, flows would be expected to virtually double, from 582 vehicles per hour in the 2028 Reference Case, to 1,032 vehicles/hour in Scenario 6A (ie based on the **Appellant's trip data**). However, the latest iteration of proposed mitigation for the Lower Rainham Road/Yokosuka Way/Pier Road roundabout allows for two lanes to turn right onto the A289. The Council accepted that this would reduce the impacts on queuing on Lower Rainham Road to less than severe.^[6.240]⁷⁴¹
- 9.185 Drawing these findings together, I consider that the development proposed would have a significant adverse impact on the transport network, particularly

⁷³⁸ See eg aerial photograph at ID54

⁷³⁹ Eg Figure 15 in ID34 page 33

⁷⁴⁰ ID54

⁷⁴¹ Mr Rand EIC

during the AM and PM peaks, in terms of junction capacities, journey times, and overall network statistics on corridors such as the A2, A289 and A278 ie subnetwork 2. The linked residual cumulative impacts in this case would, in my view, be severe, bringing the scheme into conflict with policy T1 of the Local Plan and paragraphs 108 and 109 of the Framework, which together and among other things seek to prevent such harm.

- 9.186 In support of its case, the Appellant drew attention to a Council issued decision in relation to a large residential led scheme on land at East Hill, which was issued during the April adjournment. [6.209-6.211] ⁷⁴² Although the application was not refused on highway grounds, I was directed to a reference in the **officer's report setting out that the applicant in that case undertook an** approach of considering MAM derived flows, providing a consideration of net changes in traffic flows from the model, and then providing individual junction models (Arcady and LinSig) of each junction, which approach was accepted by the Council in that case.
- 9.187 **The Council's written response,** ⁷⁴³ as supplemented orally at the Inquiry by Mr Jarvis, suggested that East Hill was distinguishable on the basis that no **'blocking back' was evident and separately, because wider, net transport** betterment of the scheme had been shown, including provision of link road.
- 9.188 I agree with the Appellant that the betterment point carries little weight in **relation terms of the matter at hand, since it doesn't go to the robustness of** the assessment in principle. However, it is not clear whether blocking back along the links between junctions in that case was an issue or not. It has been shown to be an issue in the instant appeal and I am satisfied that the MAM approach is the more appropriate model through which to consider those effects on the performance of the linked highway network. A such, that case is **not directly comparable to this and it does not indicate that the Appellant's** modelling is to preferred in all the circumstances of this particular case.

Highway Safety

- 9.189 Although no longer a matter of concern for the Council, [1.10, 6.196, 6.198, 6.262] local residents continue to have concerns in this regard. [8.31, 9.2] However, as confirmed by Mr Tucker, ⁷⁴⁴ the recorded number of accidents for the area, including the A2/Ito Way roundabout (Will Adams roundabout) the A289 Yokosuka Way/Cornwallis roundabout, Lower Rainham Road and Pump Lane, is not significant in the light of national accident rates. In the absence of any empirical evidence to substantiate the concerns raised, and noting that the mitigation measures referred to above all meet the requirements of the latest Stage 1 Safety Audit (April 2021) ⁷⁴⁵ there is no good reason to suppose that the traffic movements that would be a consequence of the appeal scheme would have a material adverse impact in terms of highway safety. Indeed, the local highway authority raises no objection on these grounds. I find no conflict therefore, with Local Plan policy T1 or paragraphs 108b) and 109 of the

⁷⁴² ID37 see also paragraph 4.3 of Mr Jarvis proof (CD 10.10)

⁷⁴³ ID41

⁷⁴⁴ See eg Section 6 of the Transport Assessment Addendum attached to the Appellant's Statement of Case and related Appendix D (CD8.1)

⁷⁴⁵ ID40 See also Section 6 of the Transport Addendum Statement September 2020 (CD8.3 Appendix 10.1)

Framework, which together and among other things seek to prevent adverse impacts on highway safety.

Conclusions on Highway Matters

9.190 I find no harm in terms of highway safety.

9.191 In terms of the highway modelling evidence, whilst acknowledging the shortcomings and apparent anomalies highlighted by the Appellant, on **balance, I prefer the outputs of the Council's more holistic MAM approach** (which models the interaction between junctions, links and journey times) over **the Appellant's isolated junction modelling approach, which itself was also the** subject of identified shortcomings and anomalies.

9.192 Whilst I have found that the residual cumulative impacts on subnetworks 3 and 7 would not be severe, that is not the case for subnetwork 2. The residual cumulative impacts on that subnetwork would, in my view, be severe, particularly during both the AM and PM peaks. I recognise that those impacts are confined largely to the peak hours and that the subnetwork forms only a part of the wider network. That does not, however, mean that the impacts cannot be considered as severe in their context. As such, even taking account of the mitigation measures proposed, I find that the appeal scheme would have a severe residual cumulative impact on the local highway network. There would be conflict in this regard with Local Plan policy T1 and paragraphs 108 and 109 of the Framework.

9.193 In support of its case, the Appellant drew attention to the constrained urban nature of Medway and the need to deliver some 28,300 homes by 2037.^[6.336] I recognise that such development would need to utilise the urban road network and draw upon its capacity. It is suggested that if the appeal were to fail, then more housing would have to be provided elsewhere, with highways capacity issues displaced rather than prevented. That may well be the case, but each scheme needs to be considered on its own merits. Without knowing in detail what any other impacts might be elsewhere, this is not a consideration that **takes the Appellant's case any further. Any highways** impacts consequential upon that scale of development would be better addressed on a strategic basis, through the emerging Local Plan. I am mindful for instance, that the Council has been awarded £170m from central government, through the Housing Infrastructure Fund (HIF) for infrastructure improvements to enable delivery of the Local Plan, including road infrastructure (consisting of six phases, involving strategic interventions on the local highway network to help unlock strategic development).^[7.213]

9.194 Should the Secretary of State prefer the modelling employed by the Appellant and/or disagree with my conclusion in relation to subnetwork 2, that would lead to a finding of less than severe cumulative impacts for the reasons set out in paragraphs 6.185-6.263 above.

Other Matters

9.195 Separated by Lower Rainham Road and agricultural land is the Medway Estuary and Marshes SPA, Ramsar and SSSI, a European Protected site, which lies approximately 250m to the north of the appeal site. It has been designated for the complex and mix of coastal and intertidal habitats which

support assemblages of winter and breeding birds as well as migratory birds and various plant species.

- 9.196 As **set out at the start, one of the Council's reasons for refusal related to the** effects of the development proposed on the integrity of the protected site, subsequent supplementary information was provided on this, in consultation with Natural England. As set out at paragraph 5.1(1) of the General Matters SoCG,⁷⁴⁶ on the basis of necessary planning conditions and an executed section 106 agreement to secure the mitigation required by Natural England, the Council did not pursue this reason for refusal at the Inquiry. Since there was no dispute between the main parties on this matter, ecological impact is not identified as a main consideration in the Report.
- 9.197 Annex E below sets out my assessment of the evidence presented in this regard. I found that the appeal scheme would not be likely to have a significant effect on any of the identified European/international designated sites through lighting, noise, hydrological impacts or physical damage and degradation to habitats when considered alone or in combination with other plans or projects. However, in the absence of avoidance or mitigation measures, there remains potential for the development proposals to lead to a significant effect on the Medway Estuary and Marshes SPA/Ramsar site via disturbance effects and, on a precautionary basis, to contribute towards such an effect at other of the coastal international/European designated sites. In addition, further detailed assessment is required in respect of NOx associated with road traffic emissions in relation to this site. An Appropriate Assessment under the terms of the Conservation of Habitats and Species Regulations 2017 (as amended) is therefore required. Such an Assessment is to be carried out by the Secretary of State in this instance, as the competent authority under the Regulations. Should the Secretary of State be minded to allow the appeal, Annex E sets out information to help inform that Assessment
- 9.198 Local residents raised concerns in relation to air quality, in particular in relation to traffic generation.^[6.261, 8.20, 8.31, 8.40-8.42, 9.1, 9.2] This matter is dealt with in more detail in Annex E below, albeit in relation to impacts on the European protected sites. Suffice it to say here, that there was no objection from the Council in air quality terms and the concerns raised were not supported by any substantive evidence. Whilst I fully appreciate local concerns, I am of the view (as set out in Annex E) that there would be no adverse air quality implications arising from the appeal scheme, subject to conditions. On this point, the recommended Travel Plan condition (condition 41 in Annex D below) includes provision for the monitoring of air quality.
- 9.199 Other appeal decisions and court judgements were put to me in evidence by the main parties. Each case turned on its own evidence, as does this case. I have had regard to these, drawing specifically on them where necessary. However, because of the individual site-specific nature of those other cases, none of those schemes and their planning context are substantively similar to this case. As such, I have given limited weight to them in determining this appeal.

⁷⁴⁶ CD11.1

Benefits of the Development Proposed^[6.5, 6.98, 6.103, 6.118, 6.185-6.188, 6.316-6.323, 7.200-7.209] ⁷⁴⁷

- 9.200 A number of what are described by the appellant as benefits in fact relate to an absence of harm, for instance high quality design including landscaping and the provision of a local centre and village green to support the function of the development itself and create a **community 'feel' and the accessibility of the location**. As such, they attract no positive weight in the planning balance. For the purpose of clarity, where there is positive weight to be ascribed, I have used the following scale: limited, moderate and substantial.
- 9.201 The housing land supply range identified by the parties is between 1.78-3.03 years.^[5.1, 6.6] Whichever figure is used, the parties are agreed that as a minimum, the shortfall is significant.⁷⁴⁸ **Even on the Council's figures, and** recognising the steps it is taking to address that shortfall both in the short and longer term,^[7.203-7.207, 7.214] I consider the weight to be afforded to the extent of the shortfall to be substantial.
- 9.202 There is also an acute need for affordable housing.^[6.2, 6.5, 6.8, 6.14, 6.18-6.21, 6.317, 6.331, 7.208] ⁷⁴⁹ In light of that, the delivery of at least 25% of the residential units as affordable accommodation (equating to no less than 313 units if 1,250 homes come forward through the reserved matters applications)^[11.3] ⁷⁵⁰ attracts substantial weight.
- 9.203 The development would contribute to employment provision, primarily through construction and related jobs over a ten year period for a range of trades and occupations, including opportunities for training and skills development. In the longer term, although not formal employment uses, the school and the care homes, together with the facilities in the local centre, would all provide a range of employment provision. Future residents would also contribute to the economy through local expenditure, supporting shops and local businesses. The weight to be given to these benefits is substantial.
- 9.204 The current use of the appeal site as a commercial orchard includes a spraying and fertilisation regime that suppresses biodiversity on the site. The appeal scheme includes a significant amount of planting and landscaping, including a buffer zone around the site and landscaping between the different development areas to create connected habitats to allow movement of animals through the site. Together with enhanced hedgerow planting, a mix of grassland habitats, tree planting etc, as well as garden areas and the swales that would form part of the surface water drainage works on the site, the development would result in significant improvements in terms of ecology and biodiversity. Indeed, one of the suggested conditions secures at least 20% biodiversity net gain.^[10.10] I consider that the benefits secured in this regard attract substantial weight.

⁷⁴⁷ See also eg the Appellant's Planning Statement (CD5.11) and Statement of Case (CD8.1) the proofs of Mr Parr for the Appellant (CD10.1 and CD10.12) and Mr Canavan for the Council (CD10.6) and the Main Matters SOCG paragraph 5.2 (CD11.1)

⁷⁴⁸ Main Matters SoCG paragraph 5.1(8)

⁷⁴⁹ ID45

⁷⁵⁰ ID14b

- 9.205 The vehicular connection between Beechings Way to the south (on the far side of the railway line) and Lower Rainham Road to the north via Pump Lane is said to be improved. This is an existing narrow lane, single vehicle width in places. The appeal scheme introduces two new junction points along the lane where the proposed estate spine/loop road crosses it, necessitating significant realignment at those junctions. I am not persuaded, in this regard, that there would be any knock-on improvements as such for existing residents in this regard, who would either have to negotiate both those junctions, or turn off onto the spine/loop road and wend their way through the proposed housing development to a new junction on Lower Rainham Road.
- 9.206 However, the appeal scheme does provide for signalisation of the section of restricted carriageway beneath the railway at the southern end of Pump Lane.⁷⁵¹ That may represent an benefit for local residents but in light of my forgoing comments, that is a consideration to which I afford limited weight.
- 9.207 Reference is made to improved pedestrian and cycle networks promoting sustainable travel and enhancing local connections through the site and surrounding area. There are already connections through the site - along Pump Lane and along the bridleway between Pump Lane and Bloors Lane (albeit that there would be some realignment of Pump Lane in places). **However, as confirmed in the appellant's IHRA,**⁷⁵² and by Mr Goodwin in oral evidence to the Inquiry, in order to avoid providing a direct link which residents could use to easily access the European designated site on foot, no enhanced pedestrian linkage between the application site and the Country Park towards the north is proposed.⁷⁵³ As such, there would be no enhanced access through the site for existing residents either.
- 9.208 It is intended to open up a pedestrian access to the site from the southern end of Lower Twydall Lane, which would allow existing residents from that part of the settlement to access open space areas within the appeal site, and potentially to the local centre and school. It is also suggested that there would localised beneficial effects for the setting and character of Bridleway GB6a, with reference to it being incorporated into areas of Green Infrastructure including the village green, linear green space, play areas and community orchards.⁷⁵⁴ However, it would continue on its existing alignment between two rows of substantial conifers. It would pass next to a proposed play area and through the proposed village green at its western end, but I am not persuaded that that is necessarily an improvement, given that it currently passes through orchards. It would also need to cross the estate loop road and is not shown as passing through or near any community orchards on the illustrative plans. I recognise that financial contributions towards bridleway improvements are secured. Those measures would benefit existing residents to some extent and are considerations that attract limited weight in my view, not least since were the development to proceed, the bridleway would pass for the majority of its length, through a housing development, as opposed to its current route through countryside orchards as it does at present.

⁷⁵¹ Dwg No 20230-05-1F

⁷⁵² *Information for Habitats Regulations Assessment* (CD5.13)

⁷⁵³ *Ibid* paragraph 6.34

⁷⁵⁴ Mr Hughes proof paragraph 1.39 final bullet (page 10)

- 9.209 Reference is made to improved public transport links as a benefit.^[6.187] The planning obligation includes a contribution towards interim assistance to support bus service provision. As set out in the TA and the HSoCGC,⁷⁵⁵ that relates to extending the route of existing bus service No 1, which currently terminates at The Strand, approximately 3km or so to the north-west of the appeal site along Lower Rainham Road. Whilst aimed at encouraging future occupiers of the appeal scheme to utilise public transport it would, however, also benefit existing residents living close to the proposed extended route. That is a consideration that attracts moderate weight.
- 9.210 Whilst the Appellant asserts that the increase in population would greatly contribute to ensuring the future viability of community facilities such as healthcare centres, post offices, and schools, there is no evidence before me to indicate that existing facilities are failing, or would fail absent the appeal scheme. As such, this is not a consideration that attracts any material weight in this instance.
- 9.211 The local primary schools are at or over capacity and the school proposed on the site could assist in this regard.^[6.187] However, its provision is largely to mitigate the impact of the future occupiers on existing school capacity. I therefore give this limited weight. The two care facility facilities are also referred to as a benefit. There was no evidence however, to demonstrate a particular need for these in this specific location. That said, inasmuch as they may increase choice for residents, I afford their provision limited weight.
- 9.212 Reference is made to income for the Council from the New Homes Bonus as a benefit. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. However, New Homes Bonus payments recognise the efforts made by authorities to bring residential development forward. I am mindful, in this regard, that the Planning Guidance makes it clear that it would not be appropriate to make a decision based on the potential for a development to raise money for a local authority.⁷⁵⁶ Accordingly, whilst the Bonus is a material planning consideration, it is not one to which I attach positive weight.
- 9.213 Increased Council tax receipts are also mentioned as a benefit. However, since the development would result in a corresponding increase in demand on local services etc, again that is not a consideration to which I attach positive weight. Similarly, the financial contributions secured via the planning obligations do not amount to benefits, since they are aimed at mitigating the adverse impacts of the development scheme on local infrastructure.
- 9.214 It is suggested that the release of Bloors Farm and Pump Farm for the development proposed would generate additional funds that would enable the Appellant to invest meaningfully in farms that produce a materially higher fruit yield. No robust evidence was produced in this regard as to the extent of that profit; to demonstrate that such funds are necessarily required at this time for investment; or that profits from the sale of the land would necessarily be

⁷⁵⁵ CD5.25 and CD 11.4 respectively

⁷⁵⁶ Paragraph 011 ID: 21b-011-20140612

reinvested as suggested. This not a consideration therefore, which attracts any positive weight.

Overall Planning Balance and Conclusion

Policy Framework

9.215 The Secretary of State is required to decide this appeal having regard to the development plan, and to make the determination in accordance with it, unless material considerations indicate otherwise.

9.216 In this case, the Council is unable to demonstrate a five year supply of housing land. Even on its best case of 3.03 years, the shortfall is agreed as at least significant. In light of paragraph 11d) of the Framework and associated footnote 7, the absence of a five year supply means that the policies most important for determining this appeal are out of date.

Heritage Balance

9.217 In coming to an overall view on the scheme, there are some 'internal' balances that need undertaking. Firstly, in relation to heritage assets, paragraph 196 of the Framework requires that any harm to designated assets be weighed against the public benefits of the scheme, with paragraph 197 setting out that any harm to a non-designated asset is also to be taken into account having regard to the scale of such harm and the significance of the asset.

9.218 As a consequence of the extent and location of the development proposed, I have found that there would be harm towards the middle of the less than substantial range to the special interest and significance of the grade II listed Chapel House, and to the heritage significance of Lower Rainham Conservation Area, with harm identified to other of the designated assets to be at the lower end of the scale. Any harm to the significance of the non-designated Bloors Oasts would be very minor.

9.219 When considering a proposal involving a number of heritage assets, as here, more weight can reasonably be attached in the overall planning balance to a **number of 'less than substantial' harms than would be the case if only one** asset would be harmed. However, these separate harms would not then cumulatively amount to substantial harm, or a high level of less than substantial harm in **the Framework context, as asserted by the Council's** heritage witness.⁷⁵⁷ Rather, each incidence of harm to the listed buildings **needs to be given 'considerable importance and weight',**⁷⁵⁸ with the Framework confirming that whatever the level of harm in relation to other designated heritage assets (the Conservation Areas in this instance, the settings of which are not statutorily protected) great weight is to be given to their conservation, with any harm to the significance of non-designated assets also to be taken into account in determining the application, taking account of the scale of any harm.

⁷⁵⁷ Ms Wedd paragraph 6.65

⁷⁵⁸ Eg *Barnwell Manor Wind Energy Limited v East Northamptonshire District Council* [2014] EWCA Civ 137

9.220 In this case, I consider the very substantial benefits that would arise from the appeal scheme to be sufficient to outweigh the heritage harm that I have identified both individually and collectively. In reaching this conclusion I have applied the balancing exercise so as to give great weight and importance to the conservation of the heritage assets, understanding that they are an irreplaceable resource. The outcome of this balance does not, in the terms of paragraph 11d)i) of the Framework, provide a clear reason for refusal. If the Secretary of State were to come to the opposite view, that would engage paragraph 11di).

Agricultural Land Balance

9.221 Framework paragraph 170b) requires that the economic benefits of this area of BMV land be recognised. I have found, in this regard, that the appeal site, which comprises more than 50ha of BMV land is capable of returning a reasonable profit and is therefore economically viable for continued horticultural use.

9.222 I am also mindful that, in relation to development plans, footnote 53 of the Framework states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. That is also reflected in the Planning Practice Guidance.⁷⁵⁹ **Based on Natural England's Likelihood of BMV Land Map (2017)**⁷⁶⁰ it would appear that that part of the District with a low likelihood of comprising BMV land lies to the north of Cliff and along the north side of the Hoo peninsula, around Lodge Hill and to the west of the Isle of Grain. Those areas also coincide with large areas of land within flood zone 3 and areas identified as SSSIs.⁷⁶¹ Excluding those built up areas, which cannot realistically accommodate the forecast housing requirements for Medway, the rest of the District is considered to be BMV land.

9.223 The Council accepts that BMV land will be required in order to meet housing needs across Medway.^[6.265, 7.91] However, none of the scenarios in the emerging Local Plan envisage development of the appeal site, or indeed any strategic level development in the same locality. I recognise that, going forward, the Council relies in no small part on large scale development on the Hoo Peninsula to meet its housing requirement and that, given the early stage **of the emerging plan, that cannot be guaranteed (notwithstanding Medway's New Routes to Growth HIF Project)**.⁷⁶² However, it seems to me that there is at least the possibility of locating strategic development, such as that proposed here, on land that whilst comprising BMV is potentially of poorer quality/usefulness than that of the appeal site, albeit that that may be some years off if it was to be delivered as part of that emerging Plan.

9.224 In my view, the substantial benefits of the appeal scheme, including the delivery of market and affordable housing at a time of pressing need, are not sufficient in this instance, to outweigh the loss of more than 51 hectares of

⁷⁵⁹ Reference ID: 8-026-20140306

⁷⁶⁰ CD6.6 Appendix 1

⁷⁶¹ CD6.6 paragraph 2.7 and 2.8

⁷⁶² CD1.4

BMV land, including the loss of orchards, being land that I have found is capable of continued beneficial economic use. BMV land is a finite asset and, once built on, it will never be available again. All in all, I consider that the loss of this significant area of BMV land, and the orchards, would have a negative effect on the provision of such land in terms of economic and other benefits, bringing it into conflict with paragraph 170b) of the Framework.

- 9.225 If the Secretary of State were to come to a different view, then the loss of the BMV land would not be a matter that weighed against the appeal proposal.

Overall Balance

- 9.226 In the absence of a five year supply of housing land, the most important policies for determining this appeal are out of date and the so-called tilted balance as set out in Framework paragraph 11d)ii) is engaged. In other words, permission should be granted unless the presumption in favour of sustainable development can be displaced. That is not to say, however, that any conflict with relevant policies should be disregarded. That will depend on their consistency, or otherwise, with the policies in the Framework. The Position Statement on Policy Matters⁷⁶³ sets out the parties' views on the various policies and their consistency with the Framework.
- 9.227 The development proposed would have a substantial adverse landscape and visual impact, with corresponding harm to the character and appearance of wide swathe of countryside between Lower Rainham Road and Twydale/Rainham. That harm is all the more significant given the status of the site as part of a locally valued landscape as recognised by its designation as an ALLI in the Local Plan, with the development causing material harm to the character and functions of the ALLI, including its function as a green buffer. That brings the development into conflict with policies S1, BNE25, BNE34 and BNE47. There would also be conflict with paragraph 170a) and b) of the Framework.
- 9.228 There is no dispute that policy S1 does not reflect the Framework and that any conflict should be afforded limited weight.^[6.29, 7.222]⁷⁶⁴
- 9.229 In dealing with development in the countryside, policy BNE25 is intrinsically linked to settlement boundaries that in turn reflect now out-of-date housing requirements. It also lacks a hierarchical approach requiring that landscape protection is commensurate with status, effectively placing a blanket restriction on most development in the countryside.^[6.33, 6.40, 6.41, 7.221] However, it does include a requirement to maintain/enhance the character, amenity and functioning of the countryside, which chimes with the environmental objective in the Framework at paragraph 8c) and with the need set out at paragraph 170b) to recognise the intrinsic character and beauty of the countryside. To that extent, I afford any conflict with it some, albeit limited weight. I am

⁷⁶³ CD11.6, **INSPECTOR'S NOTE:** Mr Canavan (for the Council) verbally corrected some of his entries on the table. The weight to be afforded in his view to policy BNE25 (page 2) was confirmed as limited (instead of medium); the weight in his view to be afforded to policy BNE48 (page 4) was confirmed as none (as opposed to limited); and the weight he considered should be afforded to policy S1 (page 5) was confirmed as limited (as opposed to full). In addition, the Appellant revised its position in relation to policy T1, as set out in ID46.

⁷⁶⁴ CD11.6

supported in that view by the reasoning of a colleague in the Orchard Kennels Decision drawn to my attention.⁷⁶⁵

- 9.230 BNE34 relates to the ALLIs.^[6.34, 6.36, 6.331, 7.222(3-5), 7.223] As noted by the Orchard Kennels Inspector, it is not a general restraint policy, but one that protects specific areas for their local landscape value. I agree with him that as such, it is consistent with the aims of Framework paragraph 170 in seeking to contribute to and enhance the natural and local environment, including valued landscapes. There was no dispute that it is a valued landscape for these purposes. Although as a local designation, it is at the lower end of the hierarchy, it still merits protection. In restricting development in some areas, the policy may have some effect on housing delivery, but that is an inevitable side effect of protecting valued landscapes. As with my colleague, I see nothing in this aspect of the policy that is inconsistent with the approach of the Framework in seeking to balance the need for housing with the interests of the environment. I recognise, as noted above, that the Council has granted permission for some development in this ALLI, but matters of landscape and visual impact will often vary between different sites. Whilst recognising the pressing need for housing in Medway, like my colleague, I see no reason in this case why the conflict with policy BNE34 should be given anything less than full weight, even.
- 9.231 Both parties are agreed that policy BNE47 is consistent with the Framework and any conflict with it can be afforded full weight.⁷⁶⁶ I have no reason to take a different view.
- 9.232 There would be harm to the heritage significance of a range of heritage assets to varying degrees, none higher than towards the middle of the range that is less than substantial in the terms of the Framework, and minor/very limited harm to the significance of a non-designated asset. Those harms bring the development into conflict with Local Plan policies BNE14 and BNE18. Notwithstanding that the outcome of the internal heritage balance, a finding of less than substantial harm in relation to designated heritage assets does not equate to a less than substantial planning objection.
- 9.233 Both parties are agreed that BNE14 is consistent with the Framework and any conflict with it can be afforded full weight.⁷⁶⁷
- 9.234 Inasmuch as policy BNE18^[6.31, 7.226] reflects the statutory duty set out at Section 66 of the Planning (Listed Buildings and Conservation Areas) Act to resist development that would adversely affect the setting of a listed building, as opposed to balancing any harm that may arise against public benefits, there is an apparent tension with the Framework. However, the underlying purpose of both the statutory duty and the Framework is to protect the special interest and heritage significance of listed buildings. It would be a nonsense not to protect them just because the policy contains no balance. On that basis, I consider that any conflict with the policy can attract at least moderate, if not virtually full weight.

⁷⁶⁵ CD4.4 paragraph 29

⁷⁶⁶ Position Statement on Policy Matters (CD11.6)

⁷⁶⁷ *ibid*

- 9.235 I have found that the loss of this significant area of BMV land is not justified in this instance, bringing it into conflict with paragraph 170b) of the Framework. I attach moderate weight to this harm.^[6.315, 7.93]
- 9.236 I have found that the appeal scheme would result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network, in particular subnetwork 2. As such, I have found that the scheme conflicts with Local Plan policy T1 and paragraphs 108 and 109 of the Framework.
- 9.237 The relevant part of policy T1 in terms of this appeal is permissive of development proposals provided that the highway network has adequate capacity to cater for the traffic which would be generated by the development. Inasmuch as it sets what the Appellant considers to be a lower threshold at which a policy conflict may be found, with the Framework allowing for adverse impacts on capacity, with refusal on highways grounds only where the residual cumulative impact is severe. I agree with the Appellant therefore that the policy is not in conformity with the Framework.^[6.332, 7.138]⁷⁶⁸ Nonetheless, inasmuch as it does require an assessment of impact on capacity, I consider that any conflict with the policy should attract at least modest weight.
- 9.238 The benefits of the appeal scheme are substantial and wide ranging. I am particularly mindful of the market and affordable housing that would be provided at this time of undoubtedly pressing need. However, when assessed and considered those benefits do not, even collectively, overcome the cumulative substantial weight I attach to the harms I have identified. In my view, the adverse impacts in this case significantly and demonstrably outweigh the benefits when assessed against the Framework taken a whole.
- 9.239 Even had I concluded that the mitigated highway impacts were acceptable and that there really was no viable agricultural/horticultural use to which this particular area of BMV could be put, I consider the landscape harm to be so substantial that, and even without the heritage harm, the adverse impacts would still significantly and demonstrably outweigh the benefits when assessed against the Framework taken a whole.

10. RECOMMENDATION

- 10.1 For the reasons set out above, I recommend, on balance, that the appeal should be dismissed.
- 10.2 In the event that the Secretary of State comes to a different view and allows the appeal, Annex D sets out the conditions that I recommend should be attached to any grant of planning permission, with Annex E containing information that the Secretary of State will need to consider when carrying out an Appropriate Assessment under the Habitats Regulations.

Jennifer A Vyse

INSPECTOR

⁷⁶⁸ ID46

Pump Lane Steering Group Community Submission in Response to the Medway Local Plan (2041) – Policy SA10 (Lower Rainham / Rainham Parkside Village Proposal)

To: Medway Council / Planning Inspectorate / All Parties Concerned

Local Plan Policy: SA10 (Lower Rainham / Rainham Parkside Village)

Paragraph: 14.11, Page(s): 286-290

Number of Objectors: 1728 (see document 2a – List of Objectors)

Area of Contention (Policy SA10):

- **Legal Compliance:** With regard to Policy SA10, we believe the Local Plan is not legally compliant and significantly conflicts with the NPPF and the findings of the 2021 appeal decision relating to a similar development on the same site.
- **Soundness of Plan:** With regard to Policy SA10, we believe the Local Plan is not sound as the proposal does not represent sustainable development. There is significant evidence provided in this submission, particularly with regard to the detailed evidence relating to the 2021 appeal on the same site, that such a proposal will have a severe impact on the local area.

Ground for Objection (Policy SA10)

On behalf of the overwhelming community response and 1728 objectors from the communities of Rainham and Twydall, and all those concerned in East Medway and beyond, the Pump Lane Steering Group is submitting this community objection to Policy SA10 – Lower Rainham / Rainham Parkside Village on the following grounds:

1. The proposal fails to protect valued landscapes and would severely harm those landscapes and the function of the site as a green buffer between urban areas and the Medway Estuary.
2. The proposal would lead to development across the site leading to a significant loss of high-quality and productive BMV (Best and Most Versatile) Grade 1 agricultural land.
3. The proposal, particularly due to its isolated location north of the railway line, would exacerbate existing traffic issues, whilst introducing new significant impacts, resulting in severe residual impacts on the highway network.
4. The proposal would fundamentally alter the historic character of the area, affecting both visual and non-visual connections to the heritage assets, which neighbour or are encompassed within the site area.

We have set out our case for objection to Policy SA10 in document 1a – Case for Objection, which forms the detailed part of our submission. We have also provided the full report appeal report (Appeal Case Ref: APP/A2280/W/20/3259868) from the Secretary of State and Inspector regarding the 2021 appeal decision (document 1b).

Finally, we have also included the full list of objectors (document 2a) who have signed up in support of this community submission objecting to Policy SA10. Please note that individual objectors have made their own comments with regard to Policy SA10, and the wider Local Plan, in addition to supporting the core reasons for Objection as above.

Submission Documents Included

1a – Case for Objection

1b – 2021 Appeal SoS & Inspector Report

2a – List of Objectors (with Comments)

The Pump Lane Steering Group’s Summary of Arguments Against Development of the Pump Lane Orchards (in the form of “Rainham Parkside Village”) being included in Medway Council's Draft Local Plan

1. Whilst we acknowledge the need for housing in Medway, the proposal (Rainham Parkside Village) for 750 homes, an 8 form entry secondary school, a 2 form entry primary school, and associated development, would cause significant and irreversible harm to Lower Rainham, with wider direct and indirect impacts on the communities of Rainham, Twydall and those living in East Medway.
2. In 2021, a similar proposal for 1250 homes was dismissed following a lengthy public inquiry (Ref: MC/19/1566, APP/A2280/W/20/3259868). The Secretary of State, agreeing with the findings of the Planning Inspectorate, issued a strong and decisive repudiation of that proposal on the basis that the loss of best and most versatile (BMV) Grade 1 agricultural land, the landscape impacts and the local highway impacts did not outweigh the benefits of development. There were also strong arguments on grounds relating to the designated heritage areas and properties.
3. The evidence presented in 2021 proved that the harms of significant development on this site strongly outweigh the benefits of housing delivery and associated facilities. We have reappraised the 2025 proposal, setting out our concerns, whilst also acknowledging the common threads and substantial weight of evidence in the 2021 appeal decision against significant development on the site.

4. Valued Landscape and Rural Character

4.1. The appeal site is recognised as a 'valued landscape' that requires greater protection under national policy:

4.1.1. The Lower Rainham Farmland Character Area is noted for its rural character. The Medway Landscape Character Assessment identifies the area as retaining an 'essentially rural character.'

4.1.2. The site is largely rural, with minimal urban influence. It is currently categorised as an Area of Local Landscape Importance (ALLI).

4.1.3. The site is characterized by rural features, including orchards and tranquility.

4.1.4. The area serves as a buffer between urban and rural settings, emphasizing the need to resist major developments.

4.1.5. The area has clearly defined boundaries separating the urban from rural, with the railway line to the south, Bloors Woods to the east, and Yokosuka Way to the west.

Document 1a – Case for Objection

4.2. The proposed development site occupies a substantial portion of the ALLI, affecting its integrity:

4.2.1. The proposal would cause irrevocable harm to landscape character and visual amenity.

4.2.2. The proposal site constitutes about 75% of the depth of the ALLI, making it crucial for maintaining a green buffer between urban areas and the Medway Estuary.

4.2.3. Development of the site would eliminate the green buffer and erode clear boundaries leaving only a narrow field width between urban areas and the estuary.

4.2.4. The proposal would also adversely affect views from the estuary and railway, diminishing the area's attractiveness.

4.2.5. Access to an attractive rural landscape for urban residents would be severely limited, as the area would become a housing estate.

4.3. With regard to the 2021 appeal decision, the Secretary of State agreed that development of the site would have a substantial adverse landscape and visual impact, with corresponding harm to the character and appearance of a wide swathe of countryside between the Lower Rainham Road and Twydall.

4.4. The Secretary of State considered the degree of harm to be significant, and came to this view having had regard to the status of the site, lying as it does within a valued landscape as recognised by its designation as an ALLI in the Local Plan (existing), and that the harm would be a consequence not only to its landscape importance, but also to its functions, particularly that as a green buffer.

5. Best and Most Versatile Agricultural Land

5.1. The appeal site comprises predominantly best and most versatile (BMV) Grade 1 agricultural land, which is currently in use as viable productive orchards:

5.1.1. AC Goatham & Sons (Goathams - who are a substantial and sophisticated operator in the top-fruit market) purchased the freehold of Pump Farm in 2011. It is reasonable to assume that, before purchasing the freehold of the farm (rather than merely renting it), they would have only purchased the farm if they considered it to be viable.

5.1.2. Since purchasing Pump Farm, they have reinvested in the site by replanting the orchards twice (4.45 ha in 2011, and 4.45 ha in 2017). It is reasonable to assume that Goathams would not have replanted had they considered the orchards to be unviable.

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5.1.3. Goathams also illustrated their confidence in the viability of the orchard by purchasing the freehold of Bloors Farm in 2016, expanding orchard production at the farm. At that time they had been operating Pump Farm for five years. Therefore, they decided to purchase Bloors Farm having had half a decade of experience of operations on the neighbouring farm.

5.2. There are significant concerns regarding the loss of the BMV Grade 1 agricultural land and productive orchards:

5.2.1. Approximately 51.5ha of the site is classified as BMV, with 96% being Grade I (Excellent) or Grade II (Good).

5.2.2. The proposal indicates a direct, permanent substantial adverse effect on BMV land, which will no longer continue as productive orchards / farmland.

5.2.3. The loss of this extent of BMV land of the highest quality is plainly a consideration which should ordinarily carry substantial weight against the proposal.

5.2.4. Historical investments by Goathams in the site suggest it is viable for orchard farming.

5.2.5. In 2021, the Council, “did not accept that allocated sites in the emerging Local Plan would inevitably involve the loss of this extent of BMV land of this quality, and certainly not a site in active agricultural use, as the site currently is.”

5.3. *With regard to the 2021 appeal decision, the Secretary of State considered the Inspector’s analysis regarding the extent of BMV land in the District and the availability of non-BMV land in the District. He agreed that there is at least the possibility of locating strategic development, such as that proposed here, on land that is potentially of poorer quality/usefulness than that of the appeal site. Furthermore, the Secretary of State agreed that the loss of the site’s significant area of BMV land, and the orchards, would have a negative effect on the provision of such land in terms of economic and other benefits, bringing it into conflict with the NPPF.*

6. Traffic and Highway Network Concerns

6.1. The local highway network is already congested, and the proposal would exacerbate existing traffic issues significantly:

6.1.1. Current conditions are characterized by heavy congestion, with queuing already occurring at junctions.

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- 6.1.2. There are limited safe walking routes to/from the site area, and very limited public transport.
 - 6.1.3. There is a rural PROW that runs through most of the middle of the site.
 - 6.1.4. The roads around the site are traditional narrow country lanes, whilst the busy main road to the north (The Lower Rainham Road), struggles with existing traffic loads and features multiple narrow pinch points.
 - 6.1.5. The two proposed schools would have capacity for around 2000 pupils. There is very limited connectivity to the existing urban area (south of the railway line), where most pupils will likely be travelling from home.
- 6.2. The proposal, including the schools, would be largely dependent on car travel, resulting in developments and communities, which fall short of sustainable transport principles:
- 6.2.1. Due to the isolated location of the site, the development will likely generate an additional 1500 two-way trips during peak hours, worsening traffic conditions.
 - 6.2.2. Key arterial routes, such as the A2 and A289, would experience significant deterioration in congestion and travel times.
 - 6.2.3. The proposal does not provide adequate mitigation to address the challenge of the existing traffic situation.
 - 6.2.4. The exacerbation of traffic issues by the proposal will lead to severe impacts on the local road network, resulting in overloaded junctions and severe congestion.
- 6.3. *With regard to the 2021 appeal, the Secretary of State agreed with the Inspector that the residual cumulative impacts on subnetwork 2 would be severe, particularly during the AM and PM peaks. He stated the appeal scheme would have a severe residual cumulative impact on the local highway network and that there would be conflict in this regard with NPPF. The Secretary of State considered the harm to attract substantial weight.*

7. Heritage Assets and Their Significance

- 7.1. The proposed development would adversely affect multiple designated heritage assets, necessitating careful consideration of the associated harm:
 - 7.1.1. The site is adjacent to (or surrounds) several listed properties and borders two designated heritage areas.

Document 1a – Case for Objection

- 7.1.2. The proposal would cause material harm to the significance of five designated heritage assets.
- 7.1.3. Historic England emphasizes the importance of the agricultural setting for the significance of these assets, which would be compromised by the development.
- 7.1.4. The assessment of harm should consider the aggregate impact on all designated heritage assets rather than evaluating them individually.
- 7.1.5. The development would fundamentally alter the historic character of the area, affecting both visual and non-visual connections to the heritage assets.

7.2. With regard to the 2021 appeal, the Secretary of State agreed with the Inspector that the heritage harms should be given considerable importance and weight. He further agreed with the Inspector that such harms should be weighed against the public benefits of the scheme.

8. Conclusions on the Proposal and National Planning Policy Framework Compliance

8.1. The proposal contradicts several key policies in the National Planning Policy Framework, and substantial weight should also be afforded to the 2021 appeal decision. Whilst that development and this proposal are not identical, it is a similar proposal which covers the same site area with the same or worse impacts. Therefore, just as the case for the 2021 development, and the subsequent strong and decisive rejection at appeal, the significant harm from the proposal outweighs the benefits, making it unsustainable:

8.1.1. 1. The proposal fails to protect valued landscapes and would severely harm those landscapes and the function of the site as a green buffer between urban areas and the Medway Estuary.

8.1.2. 2. The proposal would lead to development across the site leading to a significant loss of high-quality and productive BMV (Best and Most Versatile) Grade 1 agricultural land.

8.1.3. 3. The proposal, particularly due to its isolated location north of the railway line, would exacerbate existing traffic issues, whilst introducing new significant impacts, resulting in severe residual impacts on the highway network.

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8.1.4. 4. *The proposal would fundamentally alter the historic character of the area, affecting both visual and non-visual connections to the heritage assets, which neighbour or are encompassed within the site area.*

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Alan Stockey	Yes	The destruction of the orchards on which this new development is planned will be massively detrimental to our air quality and already crumbling road surfaces in Rainham throughout its build phase (no £106 money there to repair the damage) and worse still after the "lungs of Rainham" have been destroyed. Staggering biodiversity loss at
Leslie beckwith	Yes	750 homes equates to at least 2000 extra people in the area. Where is the water coming from and where is the extra sewerage going? Into Motney Hill which can't cope at present? The infrastructure MUST be in place BEFOREHAND. And, we've heard it all before about (false) promises that schools, community centers etc will be built and
Colin Panter	Yes	
Donna Buckingham	Yes	I thought this was already turned down and the appeal failed as it would adversely affect the view as well as the infrastructure is not there. Roads in Rainham will not cope.
Ann Martin	Yes	This part of Medway cannot take anymore traffic whatsoever!
James Buckingham	Yes	The local roads simply can't cope with the extra traffic this will create. As it stands the roads become blocked if the the lower Rainham road or A2 have roadworks, this will jut make things worse. Also the Medway Maritime hospital is already overstretched dealing with the current population, a new or better staffed facility would be needed
Mercedes Wilkinson	Yes	
Robert Handy	Yes	once agricultural land is concreted over it cannot be re-instated and with climate change we may need all the agricultural land to feed the people. I know some fools say we don't need farmers but when all foreign farms are just dust bowls then we sure do need our farmers. The current infrastructure is not capable of sustaining this develop
Robert Wilkinson	Yes	
Amanda Handy	Yes	Great concern over the water supply for all these houses, as we are already on a hosepipe ban before they are built. Also the road infrastructure will not manage with another 1400 cars on our already pot holed busy roads. Our roads are already overcrowded, this development has the potential to cost lives as ambulances will take longer to
Misia Taylor	Yes	There has been significant development along Lower Rainham road already over the last few years. The orchards are the last bit of farm land left. The infrastructure simply cannot cope with this additional level of housing.
Elie Morris	Yes	why would we want to get rid of the beautiful scenery and nature around us?
Cheryl	Yes	The impact this would have on the safety of everyone from pollution, infrastructure, travel,traffic, and services. The country element of wanting to live here is the beauty of open spaces an orchards to be destroyed for housing thats currently not needed as houses in the area on other sides remain unsold on the next phase now on hold.
Derek Benford	Yes	1) The orchards are full of wildlife, rabbits, foxes, woodpeckers and pheasants to name but a few. 2) When I moved here, I was assured the orchards couldn't be built on, as it was green belt land. 3) I recently needed a dentist and rang in excess of 35 dentists, before I was finally taken on as a temporary NHS patient! The locality just can't cope with the added burden to the NHS. 4) The lack of infrastructure is a massive problem as it is, Pump Lane and Lower Rainham Road becomes a death trap during rush hour as it is. These roads are a fatality waiting to happen particularly during peak times. 5) Since living here, I have suffered more power cuts and water outages than all of my previous addresses put together. And the constant stench from the third rate sewage system is never far away. In short - THE NEIGHBOURHOOD IS STRUGGLING TO COPE WITH THE DEMANDS IT ALREADY HAS! 6) Temporary housing is proposed a stone throw from my back garden. Who exactly, in the Council proposing to temporarily house? This earmarked site is also very near to the proposed school site. Possibly ill thought and dangerous in my opinion! 7) If the school is turned down, what alternative proposals are there for that site? 8) Is anyone going to compensate us for the depreciation in the value of our homes and for that matter, for the increased cost of house insurance? Disgraceful destruction of British countryside. Also, distinct lack of infrastructure and facilities. Total lack of consideration for the vast array of wildlife, living in the orchards
John Fitness	Yes	Noise, pollution, extra traffic, Inadequate infrastructure and the adverse effect that this proposed development would have on the ever diminishing quality of life of the residents of Gillingham and Rainham.
Nigel Beckett	Yes	
Gary Nunn	Yes	
Brian Clay	Yes	I can not see one good reason to build these homes as the impact it will have on the health of all the surrounding area with the dust and burning of the trees and people.If you count the amount of people. 750 new homes would bring in 3000 2500 cars going up and down pump lane if think this is very poor business. Infrastructure Change of environment I brought in the area for. Safety of traffic and pedestrians on pump lane. Noise, pollution during building. Not needed homes not sold now on lower rainham road. School sits empty at Teydral School. MCH health centre closing an building another surgery which will not accomdate the 3000 extra people . This is a ludicrous plan for this area.
Matt Day	Yes	This area has neither the physical infrastructure, (such as suitable road links or additional utilities capacity) or the wider social infrastructure (such as hospitals, doctors, dentist's)
Rebecca Lehmann	Yes	Medway is becoming a nightmare conurbation. It's so important to protect the green spaces that remain.
Jayne Woolley	Yes	Too much traffic as it is, not enough schools, doctors, hospitals, dentists, infrastructure just isn't there. Roads are full of potholes due to excessive traffic, numerous power cuts recently and too many water leaks. Everything needs renewing before we even start to think of building any more!
Katalin Hrebenko-Squire	Yes	I have concerns about further strains on already strained services. Drainage is poor, and Lower Rainham Road is already too busy now.
Jackie Clark	Yes	
Courtney Penfold	Yes	
Kristina Laker	Yes	
Claire Clarke	77	Yes
Chey Hallihan	Yes	The orchards are full of fruit and there is an abundance of wildlife. There is no infrastructure to support the proposed development.
Cheyenne Penfold	Yes	
Hollie Sterry	Yes	
Anna Goulette	Yes	
Paul Clarke	Yes	May we implore you to come to the same conclusion you came to less than 5 years ago following thorough examination and a tour of he area. The circumstances of which nothing has changed other than additional homes and an academy being built adding 40 minutes to journey times due to the acute traffic and immovable infrastructure
Conor Murdoch	Yes	
Ewan Murdoch	Yes	
Debbie Murdoch	Yes	
Julie Davis	Yes	
Ysabelle Downen Clought	Yes	
Jon chappell	Yes	I would like to know..... Under the Freedom of Information Act 2000, I request the following information: Housing Waiting List & Local Residency -How many individuals are currently on your housing waiting list? Of these, how many have lived continuously in your authority area for at least six years? Immigration or Residency Status (if held) -Once the council hold or consider any information relating to immigration status, nationality or residency eligibility of housing applicants? If not, please confirm whether there is any internal policy guidance regarding this. Crisis or Emergency Justification -Has any recent or proposed housing development been justified on the basis of a housing crisis, shortage, or emergency? If so, please provide a summary of the reports, data, or correspondence used to support that claim. Allocation & Priority Criteria -Please provide a summary of your current housing allocation or banding system, including the priority criteria. Are applicants with no local connection ever prioritised above long-standing residents? Cross Council Relocations -In the past 5 years, how many individuals or families have been placed into housing or temporary accommodation in your area by external councils or national bodies? Please provide this information in electronic format. The area cannot simply cope with the extra housing and associated problems that this development would bring. Destruction of natural habitat and wildlife.
Leanne Vincent	Yes	
Kerry Stubbs	Yes	
Bonny	Yes	
Peter Knight	Yes	The objections raised previously to the Pump Lane development are still very relevant today. This beautiful natural region, provides essential protection to the environmentally important area alongside the River Medway
Kathy Sheppard	Yes	We need this orchard not only for the fruit but for the wildlife - bees etc and oxygen from the trees. There is so much building work going on in this area the traffic is absolutely horrendous, hospital services cannot cope, doctors, dentists etc are not taking new patients. What is going to happen. Please, please !!! look at all the objections. W
Janet Duggan	Yes	
Sarah Young	Yes	Rainham cannot handle anymore houses
David Hale	Yes	The infrastructure of the lower Rainham area cannot deal with this additional pressure.
Lucy Clarke	Yes	The traffic will be insane and so polluting a double whammy for our environment
Ron Stronach	Yes	The lack of roads in the area, the lack of water in this region, the lack of hospital space in this part of Kent, the lack of doctors in this part of Kent, the poor air quality in this part of Kent, need I go on?
Sharon Searle	Yes	
Rebecca Stelling	Yes	We do not need any more houses in Rainham. Stop allowing all of the orchards and land to be developed. The town and roads can't cope as it is and the countryside is being spoilt.
Lisa Rayliss	Yes	This piece of land is so important to everyone's mental health. I love to go walking down there to get away from it all, so much nature and beauty. The area around this is struggling already with not enough hospitals, doctors, schools and dentists. I am totally against this building, this area is being ruined and does not have room for these
Ila Hewitt	Yes	This land should not be built on full stop. Its value as high grade agricultural land as a vital green buffer within the local landscape are too valuable to loose.
Mel Paylor	Yes	
Robert Paylor	Yes	Where is all the extra traffic going probably a 1000+ cars plus we need a new hospital not houses for profit and certainly not affordable for locals.
Laurie Snell	Yes	
Nicholas Humphrey	Yes	

Name	Do you reaffirm your objection to the destruction	Please use this space to make additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Jenny Pattenden	Yes	The air quality in Rainham is already suffering with the amount of traffic and queries that are becoming part of the norm. Children's health is suffering let alone taking away more green spaces. The hospital is struggling to support the amount of people currently in the area and additional people is going to effect them further. GP's/dentists/orthodontic/ health visitors etc are all very short staffed. Schools/nursery/childcare facilities/social services/mental health services-are all unable to provide the necessary resources already required. Water supplies water shortages, pipelines are old and need upgrades. Electricity and Gas all need extra resources. All of the above.
Jarvis Clement Walker	Yes	Already written to them with our objections which are mainly about the lack of infrastructure.
Mark Beard	Yes	There is no infrastructure in the area. The roads are gridlocked every day I cannot even get out or into my drive most days due to the sheer volume of traffic. Stop killing this area. There is plenty of space in other parts of the country. The government is turning Kent into a concrete jungle. I hope people see sense & bin this silly idea.
Amy	Yes	
Helen Kerr	Yes	Save our Wildlife and the environment should we be keeping green spaces instead of making a concrete jungle
Heather Gilbert	Yes	Agree with the above
Jonathan Kerr	Yes	
Sarah Kemp	Yes	More green space lost to housing that would infrastructure cannot accommodate, This housing is unsustainable
David P Slater	Yes	Worrying destruction of Agricultural land affecting our local wildlife and road infrastructure, along with a General Hospital that cannot cope already with the amount of people living in its catchment area, meaning even longer waiting lists and difficulty obtaining Doctors & Dental Surgeries.
William Dawson	Yes	Agree with above comments
Christopher Clement W	Yes	Already written to the planning inspectorate This area is entirely unsuitable for large-scale development for several reasons: Loss of agricultural land: These orchards are a valuable food-producing resource at a time when national food security and sustainable farming should be a priority. Inadequate infrastructure: The surrounding road network—particularly Lower Rainham Road—was never designed for high traffic volumes. It already suffers from chronic congestion. The layout of existing housing makes any meaningful highway improvements unfeasible. Environmental harm: The proposed development threatens one of the last remaining green spaces in this part of Rainham. It acts as a vital green lung, helping to offset poor air quality, and serves as a wildlife corridor linking to the Country park and fields to the north. Reintroducing this proposal not only disregards local voices and environmental priorities but also undermines trust in the planning process. This land, designated as prime agricultural land, has already been the subject of a previous planning application—one that was not only firmly opposed by the former Medway Council administration, but ultimately rejected by the Planning Inspectorate. That rejection followed significant public opposition and came at considerable cost to the community. It is wholly inappropriate for development—past decisions have shown this clearly, and nothing has changed to justify a reversal.
Danise Harris	Yes	
Craig Harris	Yes	No infrastructure Not enough doctors Hospital overran
Sarah Stepney	Yes	Traffic congestion already horrendous along the lower Rainham Road and surrounding areas Rainham used to be beautiful yet every piece of Greenfield is being destroyed
Katie Kemio	Yes	Too much traffic on the Lower Rainham Road already!
Larry Williamson	Yes	Even if all the properties built were affordable we could not cope with extra vehicles in our area. The doctors surgeries and hospitals are already overwhelmed.
Paula Cairns	Yes	We urgently need to address the biodiversity crisis. This potential development is totally in the wrong place. "Wrong development in the wrong place for the wrong reasons."
Leon Roddick	Yes	We have more need to preserve green space for the benefit of the wider community than housing here, where infrastructure is already creaking under the load of inappropriate development.'
Max Harris	Yes	I love walking through these orchards on my way to school and do not want them to be destroyed for houses. We need to protect our trees, not chop them down unnecessarily.
Zoe Pokora	Yes	
Olivia Smith	Yes	
Karen Stone MBE	Yes	It is incredibly sad that this is up for debate again, particularly as nothing has significantly changed from the last application which was refused and if anything the infrastructure in the local area has got worse; the roads are constantly congested making impossible to travel in the local area, the GP surgeries and Medway Hospital are at breaking point and these orchards are prime agricultural land which should be preserved
Debra Hawkes	Yes	This proposed development is very profitable orchards, which produces the most amazing crop of apples, But after few years the trees have been laden with apples and as a small country we need those orchards otherwise we will have to rely on crops being imported from overseas, which makes no sense whatsoever
Christine Clarke	Yes	Medway especially Rainham does not have the infrastructure to cope with any more housing. The roads are gridlocked, the hospital is at breaking point and these orchards are prime agricultural land which should be preserved
Dylan Cale	Yes	
Sharon Curllife	Yes	Too much greenery already taken away and destroyed. Bad enough with Norththane Way
Kasey Kelly	Yes	Rainham has literally been saturated with new housing developments over the last few years - it is now totally unrecognisable - no more building on our green open spaces - we do not want to live in a concrete jungle!
Claire Moore	Yes	This area cannot cope with any more house There is already too much traffic on the Lower Rainham road and surrounding areas. The water and sewage system cannot cope with the amount of houses there that at the moment, along with the roads that are constantly needing repairs due to the amount of cars and lorries that go on them. The Lower Rainham road was designed as a B-road, not for high-volume traffic which would be made even worse if this development was to go ahead. The local Hospital and doctors are struggling to cope with high demand as there are too many people in the area. Destroying more green land means destroying homes for wildlife. The area does not need any more houses built on it, it is already overcrowded.
Grace Smith	Yes	Further destruction of residential landscapes with little or no regard money for Rainham to the area. The facilities for local people are already over run. This change will make things unbearable.
Allison Stickleis	Yes	Hospitals, Doctors,Schools and definitely the local roads and Motorways can not cope with the amount of new builds that have swamped Medway and Swale
Michelle Green	Yes	Please take into account the amount of housing sites already approved in this area and as a resident how this affects all our lives. I used to live with fields around me now I'm in the middle of a 2/3 car lane please stop
Stephen McIntosh	Yes	We are bursting at the seams. No infrastructure to support all the new houses. Traffic is already like London.
Deborah Gorman	Yes	It's very sad we have to go through this again. As before the roads at Lower Rainham and Beachings Way cannot cope at rush hour now, let alone with another 750 houses that probably will have 2/3 cars per house hold increasing the traffic.
Mark Ratby	Yes	Although the Enquire proposal is for 750 properties the adjacent plots are also in the pipeline to be developed probably by a different company (according to an Enquire planner at the consultation event) Is correct and those developers haven't been appointed yet?
Allison Doyle	Yes	Do we really need another secondary school so close to others in the area? Even with a widened Pump Lane school traffic alone will cause issues
Marilyn Croucher	Yes	Rainham has become over populated and as a result, services including the health services, doctors, hospital capacity etc has deteriorated with no proportional measure to accept these increases, no investment. I cannot get doctor appointments, the hospitals are struggling more than ever, the roads are more congested with constant closures
Diane Pullen	Yes	No infrastructure to support this. Medway hospital cannot cope the roads cannot cope. We do not need more housing on Lower Rainham road. There is increased traffic and pollution as it due to new housing estates. How many times do we need green space.
Lynsey Clarke	Yes	This application is just stupid. We have already objected to, and overturned, a previous application, so why would the Inspectorate think we have changed our minds? I'm just finding all of this utterly maddening. How many greens do we have to go through this? Are you not listening? No means no.
Elizabeth Tredgett	Yes	This area is already saturated with new developments and local infrastructure is already overwhelmed.
June Park	Yes	I enjoy walking in this stunning area of countryside and enjoy the wildlife, it's one of the few places left in the area to experience it. There has been so much destruction to the countryside in this area which is now so built up. It has made the lower road quite busy and dangerous. More housing will add to this. I fail to understand how we have a government focused so heavily on net zero and yet we are looking to cut down trees which eradicate CO2. It makes no sense whatsoever. Given all the empty housing and brown field sites available including areas which were passed for development in the area which still haven't seen a single house built on it, it is a disgraceful use of public funds.
Charlotte Flannery	Yes	This land should be kept for farming not wasted on houses that we don't need. Rainham has already been developed well beyond its infrastructure. Roads are regularly log jammed, doctors' hospital over stretched, air quality low and water supply issues. It's far too large a scale development right in an already built up /highly populated area.
Steve Stone	Yes	Why spend 250k on the refusal and now add it back in? What a disgraceful use of public funds.
Emma Aldous	Yes	Pressure on the local hospital- we don't have enough beds for the population as it is.
Kirsty Outendunen	Yes	Sewage burden. Lower rainham road and pump lane cannot cope with the sewage it has. There is a frequent smell in these areas.
Margie Francis	Yes	Bats are frequently seen flying in the orchards. What about other wildlife too? Concerns around traffic. Rainham cannot cope with the existing traffic.
Anita Bushell	Yes	I am speechless that this is back up for consideration as nothing has changed, the proposed plan of 750 houses , a secondary and primary school will mean that the number of cars and people will equate to the same numbers as previously and the area is just not able to cope with this increase, the infrastructure is already stretched to breaking point
Susan Rogers	Yes	The destruction of viable agricultural land that enables wildlife to move between great green areas has to be stopped. The pockets of green landscape in such an over developed urbanised area is essential to maintain boundaries and a better ecosystem. The increase in traffic on an already broken infrastructure of roads, sewage and waste
Rebecca Baldoob	Yes	As well as all of the reason stated by the steering group all of which I agree wholeheartedly with I would also like to reiterate my concerns regarding the poor air quality in the Rainham area and the negative impact it feel further development and distraction of our natural areas will have on this. We all deserve to breath clean air but I also have to breathe the air that is being pumped out of the cars and lorries that are stuck in traffic.
Louise Macdonald	Yes	Totally opportunistic attempt to destroy grade I listed agricultural land. The section 166 money promised against this and other local developments is not coming to fruition to the benefit of the local residents so extremely unlikely to change in this case. No one has listened to me previously but I live in hope that in this occasion common sense will prevail
Michael Rogers	Yes	Destruction of even more of our green spaces which provide a cleaner air than urbanisations. More traffic on roads which already struggle coping with.
Brigitte Reeve	Yes	A local hospital which provides the best service it can whilst being far too small for the area it covers, more people will make this problem even worse, it is also hard enough already to get to see a GP let alone being new and needing to register.
Edward Rapley	Yes	Many houses now are being rented out to London councils at astronomical amounts bringing in many undesirables to the area. Leave our little piece of the garden of England as it is, for generations to enjoy in the future.
Susan Winder	Yes	Infrastructure/hospital/doctors cant cope now the whole system is overloaded will be overrun with more houses people cars ect
Stephanie Curtis	Yes	Kent is the Garden of England. It must stay that way. Our own agricultural land is vital to our nation and the orchards are vital to this community. They provide a green lung to what is fast becoming a concrete jungle. So many negatives have been proven in 2021 and these are just as important now as they were then. The planning inspectorate should take into account the fact that the area is already over developed and that the infrastructure is already at breaking point.
Sarah Green	Yes	Rainham/Medway cannot cope with more housing especially on green belt it has to stop
Amanda Grundy	Yes	The area can't support more buildings, already at breaking point with roads, drains, ditches, surgeries and hospitals
Tara Curran	Yes	I am just appalled this area has come back in for possible redevelopment. We need to preserve this prime agricultural land , wildlife etc and I really don't understand how building this amount of houses right next to roads that are basically so tight (one car only)in places with children walking down without pavements can be considered safe
Steve Honeyball	Yes	Rainham has already lost vast amounts of its green space, it has turned into a concrete jungle. The ridiculous traffic issues being just one of the many reasons this cannot continue. This is Kent, the garden of England, please leave us alone.
Jeanne Asquith	Yes	I cannot believe the cheek of AC Gotham to try & get planning through on that land again, they lost for a reason & have just dismissed those reasons, it is pure greed just look at the amount of agricultural land they have sold off for housing in recent years. They need to be stopped !! Rainham cannot handle more houses on the lower road if it is not for the fact that the area is already over developed and that the infrastructure is already at breaking point.
Geoffrey Winder	Yes	The roads cannot take the thousands of more vehicles, we all struggle now with the congested roads. We seem to have more vehicles driving at speed on Lower Pump Lane and this is before more houses are built. Agricultural land should be left and not spoil. Buy British fruit and veg. If the council had their way they would agree to every
Vivienne Harris	Yes	

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Lyndsay Johnson	Yes	
Mark Hewer	Yes	<p>I will supply additional information to the council as allowed for as part of the consultation.</p> <p>The inspectorate refused the appeal previously on varying grounds, I mention some below that I feel are of the utmost importance.</p> <p>The highways were a contentious issue as they were at that time stretched to their limit. Since the rejection Rainham has been subjected to many new building developments which have further pushed these roads to breaking point.</p> <p>Air pollution is far higher now than 2021 & it is an unacceptable levels.</p> <p>Indeed as an Asthma sufferer I can feel the difference the growth of traffic levels have made to my condition.</p> <p>The original reasons for rejection are therefore more pertinent now.</p> <p>The proposed land is profitable as a working & high yielding orchard. Indeed AC Goatham are sole supplier for apples to Aldi I believe so these fields are very profitable.</p> <p>It is also graded as best & most versatile for growing & to be kept as such for times of national emergencies.</p> <p>Given that the world is in a state of flux, uncertainty & dismay due to multiple conflicts in 2023 it is unthinkable this land should be built upon. As a country we have become too reliant on the importation of our food & losing this land would add further strain to this.</p> <p>Historically this Kentish 'hut hut' has existed for generations, I find it abhorrent that the greed of a small group of people would steal this land from future generations.</p> <p>The green lungs of this area cannot be replaced once built upon.</p> <p>Medway Hospital is not fit for purpose due to the huge increase in population in recent years. Operations are cancelled. Beds are not available to those who need them & corridors are used as overflow wards.</p> <p>Local GP surgeries are full. Wait times to see a GP can be weeks.</p> <p>This is not seen in all areas of the UK, seemingly only in areas where land & houses are priced high.</p> <p>To add thousands more people to this is creating more burden when the system is so far stretched already.</p> <p>I object to this development on every level.</p>
Sarah Freier	Yes	<p>Are considerations being made for the increased sewage waste, household rubbish waste, water usage and the absurd sewage discharge into the Medway estuary. This development is in addition to the 2000 houses earmarked for brethhurst. All of which will feed back into Medway. Medway council are broke and will fold to any developer.</p>
Patrick Curran	Yes	
Michael Adams	Yes	
Stephen Eriksson	Yes	
Judith Ballard	Yes	<p>This cannot happen, the building requests in Medway on green fields and orchards are a disgrace. The roads can't take any further traffic. The hospital is full to the brim. You can't get a GP's appointment. There are no places in our schools. Our town's are going to rack and ruin, this has to stop. Medway is not a nice place to live any more,</p>
Sally McBride	Yes	
Heidi Folk	Yes	<p>Did the other side pay all the costs after they lost. I think this would have been a deterrent. This has already cost vast amounts of money and should never be considered again in any format</p>
Lianne Partington	Yes	<p>Beautiful productive orchard and the infrastructure cannot handle anymore housing /population in Rainham. The roads, hospital, doctors dentists, schools cannot cope with anymore additional housing. We need some productive green space saved, once we the orchards of England now we are becoming an extension to London. No more farms</p>
Sally Tarbit	Yes	<p>This is an environmental disaster and more so, the road infrastructure cannot support the additional cars and traffic</p>
Sarah Norton	Yes	
Penny Cadman	Yes	<p>I object to the development of this agricultural land. I am concerned that it will adversely affect the diversity of nature, the rural aspect of this part of green Medway, traffic and pollution. It will also add pressure on existing services. Please find brown field sites for redevelopment, not green field sites like this one.</p>
Michael Halbritter	Yes	<p>Apart from the additional traffic, I think this development would would devalue the properties already located in the adjacent area and spoil there views and peace.</p>
Louise Wragg	Yes	<p>As an allotment holder that's runs alongside the orchards I see daily flosses badgers rabbits a variety of birds, and many many bats and insects on a daily basis, but by bit their habitat is being destroyed, soon there will be no where left for the animals. I would also like to state that the infrastructure can not cope with the amount of traffic, it will be too much for the roads.</p>
Karen Adge	Yes	<p>Congestion on roads that cannot be widen. Loss of air quality with trees being destroyed and property going up. Medway has an extremely high asthma rate in part to London we need our trees for clean air. The plans being submitted are unacceptable nothing will make this doable.</p>
Sophie Ives	Yes	<p>It is absolutely ABHORRENT to destroy all of that wildlife and nature! There's nothing worse that humans could do on this planet (excluding a nuclear bomb)! The ONLY Hospital was at breaking point back in 2021, let alone now! I worked in outpatients management and I know for a fact that the waiting lists for 1st appointments for some of the most common ailments are over 12 weeks!</p>
Geoff Clarke	Yes	<p>Another agricultural asset in what was the garden of England being destroyed for greed. More imports more traffic. More pollution.</p>
Claire Gordon	Yes	<p>Medways current infrastructure does not have the capacity for additional housing. Hospital, doctors, schools and roads are over subscribed. Equally this land has been of agricultural use for decades and should remain that way.</p>
Denise Lockyer	Yes	<p>The roads and infrastructure are just not available for houses in this area. As planning committee members you must be aware of the absolute carnage this will cause on Lower Rainham Road and other surrounding rounds, not to mention the extra strain on Medway Hospital. The health centre and schools will not be built</p>
David Lockyer	Yes	<p>INFRASTRUCTURE,HOSPITAL,ROADS,CONSTRUCTION TRAFFIC, LOW WATER PRESSURE ON EXISTING HOUSES, LAND LEFT FOR NEW SCHOOL AND HEALTH CENTRE WILL NOT BE BUILT</p>
Shella Collins	Yes	<p>The traffic is already considerable with roads of poor quality. Would add to difficulties for dentists doctors and hospital appointments</p>
L Pellett	Yes	<p>Medway is already too overcrowded and lacking enough facilities for those people it already holds ie Hospital, Doctor and Dentist access. It also now has very little green space left so to remove this to put further houses up would be a huge blow.</p>
S Naylor	Yes	
Carole Pollington	Yes	<p>The orchards are the last green area of Gillingham/ Rainham. Pump lane / lower rainham road too small for another 1000 cars. Pump lane is constantly dug up due to water issues for the small housing estate - the water system will not cope with another 750 houses without even more disruption for the local population</p>
Jayne White	Yes	
Mark Crane	Yes	<p>Good agriculture land should not be used for development, the proposed land is on the edge of a nature reserve and country lanes with no road infrastructure that current traffic can cope with and the increase in traffic if development was granted would only add to this. Local school routes already bottle neck between Motney Hill and Broomfield. Traffic calming measures on the lower Rainham Rd are inadequate. Speed bumps to small allowing vehicles to speed and not slow down. 20mph zones not enforced and 30mph zones to fast through the traffic lights adjacent to the Public House Three Martins.</p>
Debbi Atkinson	Yes	<p>There is brownfield sites very close by that should be considered for development before destroying orchards.</p>
Elaine Terry	Yes	<p>This is a beautiful area which supports green spaces which is important for mental health and also for wildlife. I visit often as I have family who live in the area</p>
Jayne Mealey	Yes	<p>With the further development at the Otterham Quay Lane end of Lower Rainham Road our Roads are so over loaded at certain times of the day the roads are already practically at a stand still. That's the whole of this area including most of Lower Teydall too. There are already 4 primary and 3 secondary schools that all have to drop off and</p>
Brodley McLoughlin	Yes	<p>The orchards have been part of our community for many years. From socialising dog walks for especially older people to kids running around be sad to see them go and everything becoming buildings and all nature and land being removed</p>
Crystal Cotterill	Yes	
Chndy Lee	Yes	<p>I urge the council to rethink the impact this build will have on the existing infrastructure. Living particularly close to the site I have seen first hand the impact that the current building on lower Rainham road has had. I already cannot get a dentist appointment, I am barely able to see my GP. The wait lists are never ending to see a specialist at</p>
Andrew Jenkins	Yes	<p>The Rainham Community are right to protect this land. They a have valid reasons which have been upheld. Medway Council need to listen act and support.</p>
Carole Kent	Yes	<p>Totally oppose. Lack of infrastructure, hospital, school etc.</p>
Keith Mackenney	Yes	<p>The impact on hospital and Dr</p>
Jan Bentley	Yes	<p>I cannot believe that this proposal is being considered once again after the recent very lengthy and costly planning process which resulted in the Inspector's complete rejection of the previous development proposals. This is the wrong place for a development of this size on prime agricultural land in an area that provides a much needed green space for the community.</p>
Kelly Ascheri	Yes	<p>The current infrastructure regarding roads, water, sewage and electrical supply is currently inadequate and not robust enough to cope with the existing buildings and ongoing building works, let alone add another 750 homes, school, care home and other amenities in this proposed development. This is without the impact it will cause on the environment.</p>
Emma Stewart	Yes	<p>The land being considered is not unused green space. It is land currently used for agriculture which has been there for many years. I live very close to the area and have done for a very long time. These beautiful orchards make up the character of where we live. The proposal will bring overcrowding to the area, put a strain on facilities and it will be a disaster for the community.</p> <p>1-it is already extremely difficult to cross the Lower Rainham Road as there are no crossing point between Riverside Park and Grange Roundabout</p> <p>2-there is already an extreme litterfly tipping problem in this area, a lack of litter and dog poo bins, I have already complained numerous times to the council to no avail</p> <p>3-the over crowded roads that are extremely poorly maintained will become even worse</p> <p>4-further pollution</p> <p>5-parking on and near new build estates is always an issue as sufficient parking is not included leading to pavement parking and difficulty for local road users</p> <p>6-any new housing should be reserved for local people only not sold out to London councils or London overspill.</p> <p>7-Gillingham has some of the most dense housing in Medway already along Pier Road without a shuttle service to the train station, locals have to wait months for driving exams as the volume of Londoners that have moved here that previously relied on public transport find that the infrastructure is not in place in Medway so they need to use the train.</p> <p>8-there is an immense amount of wildlife here that further development would have a disastrous effect.</p>
Janet Mackenney	Yes	<p>I'm disgusted that this has surfaced again after its complete rejection last time.</p>
Gloria Woolley	Yes	<p>Previous planning was refused it went to appeal at a huge cost and was refused - how can this be fair putting us and the people that boarder it through all this new stress and putting people's lives in limbo again - Rainham can't cope with an extra 1500 plus cars more strain on doctors, dentist and school places!</p>
Steve Mooney	Yes	<p>When anything happens on M2 or Lower Rainham Road closed Rainham is gridlocked which then creates more air pollution!</p>
Anne-Marie Hewer	Yes	<p>I strongly object to the Pump Lane proposed development being included in the Local Plan or being used for any other development. This is prime agricultural land and any changes will have an adverse effect on the whole area. The proposed changes to infrastructure will never be enough to adequately deal with the enormous amount of traffic that will be generated. My objection is full will be submitted additionally. I am utterly appalled and dismayed by Medway Council's idea to include the proposed development of Pump Lane Rainham Orchards into their Local Plan, to include housing and numerous school developments. At Goatham attempted to develop this piece of land and was thankfully rejected. The Planning Inspectorate highlighted the potential harm to the countryside's character and appearance - how has this changed? Lower Rainham is already more urban than semi rural due to the number of housing developments that have been allowed since the last proposal was rejected.</p> <p>The Planning Inspectorate commented that the orchard site is designated as part of a valued landscape and is an Area of Local Landscape Importance.</p> <p>I believe the decision of The Planning Inspectorate in 2020 should be upheld and the renewed proposal of Pump Lane Orchards should be removed from Medway Council's Local Plan 2041.</p>
Julie Price	Yes	<p>Planning permission was refused before, so what has changed. We need to keep our orchards.</p>
Steve Woods	Yes	
James Martin	Yes	<p>This new proposed development should be refused on exactly the same grounds as the previous planning refusal and appeal refusal. The scale and scope will have similar if not worse impact on the local area than the previous scheme.</p>
Charlotte Cooke	Yes	<p>I just cannot believe that yet again another green space is going to be taken. Our children and future generations are going to have nothing. You truly are destroying our environment for more housing and yet again no more infrastructure or make the areas that we already have matter. The roads are shocking, not enough schools, etc yet you are still building more houses.</p>
Josephine Milbank	Yes	
Douglas Smith	Yes	<p>Lower Rainham Road is already at times a bottle neck with two sets of traffic lights and another one planned within a few hundred yards of the existing ones. During the rush hours cars and large lorries are at a standstill. 750 new homes means around 1000 more cars this road will be unable to cope. After talking to their representatives you can see they are not interested in the local community's concerns.</p>
Nicola Kingston	Yes	
Tina Bruce	Yes	<p>Traffic, loss of wildlife habitat</p>
Leah Ellis	Yes	<p>We live on Lower Rainham Road and the pollution is now unbearable. Not only that the old Victorian sewerage pipes absolutely stink and overflow. We can't have our windows open through pollution and the smell. We have a 2 year old. School spaces are already pushed. We live in a historical property that leads straight out onto Lower Rainham Road.</p>
Johanna Galton	Yes	
Debra Pryor	Yes	<p>I object to this as it destroys green space and buffer area will not exist. We will lose agriculture land and traffic will increase in an area that can't manage further traffic. If reasons for objection in 2021 were valid then they are still valid and this should not go ahead</p>
Claire Hickman	Yes	<p>Our infrastructure cannot take any more new builds. We have water shortage. Lack of GP Surgeries. Roads are busy with too much traffic.</p>
Michelle Ankers	Yes	<p>1) The area is already densely built up due to the new developments on LNR 3) Strain on healthcare services, there is only 1 hospital i. Medway 3) Lack of amenities in the area with GP appointments and school places already a struggle 4) Protecting Our Orchards</p>
Harley Tutt	Yes	<p>Traffic will be horrendous and not good for the climate</p>
Andrea Jurs	Yes	<p>Traffic in the area around pump lane, lower rainham road and Bloor's Lane is already dreadful, especially when there is an accident on the M2. There is no access to the orchards - the single track road cannot be widened, lower rainham rd cannot be widened, and the other side is a dual carriageway. Rainham's infrastructure is struggling at the moment.</p> <p>We moved to Lower Rainham Road 19 years ago, having lived in Gillingham and Rainham all my life. As a child I played in these orchards (and was chased off by the farmer). The dream was to live semi rural.</p> <p>Unfortunately, in the past 19 years we have been seeing the destruction of our countryside and the increase of traffic. The increase of pollution is very noticeable, especially my husband who has asthma. There is a serious lack of infrastructure and the lower road is constantly being closed to repair services which are under strain presently.</p> <p>Medway hospital cannot cope, doctors cannot accommodate, and as for housepiss bans! Our bills have been doubled but no new reservoirs are being built so no new reservoirs are being built so no new reservoirs are under more strain!</p> <p>I completely oppose this development and the destruction of our wildlife.</p>
Kay Maher	Yes	<p>If this was to go ahead I would become a prisoner in my own home watching hundreds of lorries thundering past my house undermining the roads, utilities and our health.</p>
Hilary Brooks	Yes	

Name	Do you reaffirm your objection to the destruction of the Pump Lane Orchard? Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Nicola Tutt	Yes
Emma Smith	Yes
Donna Bowman	Yes
Gertrude Hayward	Yes
Rob Toms	Yes
Nick Carden	Yes
Mavis Hollingsworth	Yes
William Heaton	Yes
Denny Galton	Yes
Jill Arnold	Yes
Laura Sparks	Yes
Darren Andrews	Yes
Amanda BUCK	Yes
Richard Sawyer	Yes
Linda Thomas	Yes
Karen Blake	Yes
Lauren Bailey	Yes
Evan Harris	Yes
Linda Reynolds	Yes
Lynn Williamson	Yes
Simon Harris	Yes
Charlotte Jones	Yes
Valerie Gillett	Yes
Leanne Cayless	Yes
Lynn Drake	Yes
Sally Hughes	Yes
Sally White	Yes
Julie Seager	Yes
Maria Jarvis	Yes
Anne Byrncraft	Yes
Paula Heddbitch	Yes
Charles Streete	Yes
Colin Heddbitch	Yes
Anthony Rist	Yes
Steve Mooney	Yes
Danny Milbank	Yes
Daphne George	Yes
Jane Sedgwick	Yes
Stephen Button	Yes
M Everett	Yes
Linda Cavalli	Yes
Karen Ford	Yes
Sue Sandy	Yes
Olle Drake	Yes
Mark Driscoll	Yes
Caroline Marks	Yes
Susan Birch	Yes
Lita Lamb	Yes

Name	Do you reaffirm your objection to the destruction of Rainham? Please use this space to make additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Dennis Lamb	Yes
Ricky St Ange	Yes
Susan Raddon	Yes
Denk Pantony	Yes
Sue Metcalfe	Yes
Steve Winchester	Yes
Vlada Kneša	Yes
Arturas Tytoniak	Yes
Jillian Edwards	Yes
Julie Field	Yes
Holly Bee	Yes
Helen Jones Gill	Yes
Chris Day	Yes
Judith Carr	Yes
Tilly Smith	Yes
Joyce Day	Yes
Michael Day	Yes
Shannon Page	Yes
Terri Anne Short	Yes
Nicki	Yes
Victoria Leeds	Yes
Zoe Rogers	Yes
Clare Healy	Yes
S.Hillery	Yes
Gwen Nathan	Yes
Sharon Collins	Yes
Ruth Beattie	Yes
Alan Round	Yes
Elaine Millington	Yes
Sharon Lumley	Yes
Trudy Wilde	Yes
Andrew Fill	Yes
Mark Beattie	Yes
Sanah King	Yes
Anthony Odd	Yes
Lisa Moss	Yes
Brian Wren	Yes
Barbara Allen	Yes
Barry Cadman	Yes
Rachel Cooper	Yes
Rebecca McDonald	Yes
Ozzy Nathan	Yes
Belinda Jee	Yes
Lissa Selfe-Hudson	Yes
Patricia King	Yes
Chris Strudwick	Yes
Hazel Lloyd	Yes
Winston	Yes
Laura Pennington	Yes
Simon Wheeler	Yes
Carole Osmond	Yes
Aimie Hudson	Yes
Jayne Mills	Yes
Janice Kettle	Yes
Katherine Hurst	Yes
Teresa	Yes
Dianne Hemming	Yes
Nim Thorp	Yes
Jacqueline Funnell	Yes
Dean Gilbert	Yes
Sarah Humphrey	Yes
Marion Boyns	Yes
Alan Wilkin	Yes

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Debbie Stillwell-Cox	Yes	Rainham infrastructure is not suitable for such a large estate...roads are already a nightmare and in addition to this the land is grade a agricultural land and should be left alone
Adrian Stillwell-Cox	Yes	Loss of prime agricultural land and poor infrastructure currently experienced will make this horrendous
Janice Hyatt	Yes	
Francis Flynn	Yes	How can you justify tipping up 60,000 trees? We teach the young kids at school trees are good for us. This is an absolute massacre on our climate. This cannot be allowed to happen. This is grade a agricultural land it has already been rejected by local council and government. And yes, here we are trying to justify ourselves once again please
Lorraine Shephard	Yes	No improvement in infrastructure, roads around Rainham already gridlocked. Medway Hospital couldn't cope 15 years ago, nothing has changed yet still they add more and more to Rainham, which is already suffering from over-construction. It's the aim to concretise from London all the way down to the coast and then moan, there isn't a
Dan Morrison	Yes	To much development already...roads are already full. Not enough dentists doctors hospital space etc
Michelle Edwickier	Yes	
Nick Edwickier	Yes	
Pauline Nash	Yes	
John Linehan	Yes	
Alan Munn	Yes	The area is designated green space as well as agricultural growing land. The number of houses planned is ridiculous and seems to have no allowance for the increase in traffic and people. There is no sufficient upgrade to the road structure (a lot of the existing roads are little more than glorified single track roads)
Claire Wybourn	Yes	The plans are not suitable for the area which all ready struggles to cope with traffic and housing. There are continuous gas and water issues which lead to problems in the area as it cannot serve the population here as it is. The farm land is prime agricultural land which serves the local community and the proposed houses will not be with
Tracey Harvey	Yes	Rainham is already gridlocked & the lower Rainham Rd is not the correct infrastructure for more traffic as a result of more housing. This is before you take into account already overstretched demands on utilities & services in the area.
Denise Docherty	Yes	Why are the previous secretary of states comments now being disregarded about the orchards
Denise Docherty	Yes	<ul style="list-style-type: none">Impact on the character and appearance of the surrounding countrysideEffects on designated and non-designated heritage assets.Loss of best and most versatile (BMV) agricultural land for farming foodImpact on the local highway network capacity and safety due to increased traffic and congestion
Alan Duncan	Yes	
Angie Sandys	Yes	
Victoria Galehawk	Yes	The access roads to this infrastructure is not suitable for the amount of housing The environmental impact on building on this land is non reversible. Dangerous traffic to the near by schools.
Jonathan Carey	Yes	I assume the extra traffic generated by this development will be using existing already busy roads and there is no provision for the extra healthcare the influx of people will inevitably bring. The lower road is already over used by vehicles avoiding the A2 for example and often seems to be shut or restricted due to roadworks. Where will the apples come from to fill the gas left by no longer harvesting those grown on this site? From the continent or further no doubt.
Damen King	Yes	I have an allotment on the Lower Bloors Lane site and feel this will have an impact on our enjoyment of our semi rural site and if development of these orchards begins the vermin (rabbits and rats) will likely be forced onto our site causing loss of crops and possibly at the extreme resolve some people to give up growing food for themselves
Matthew Dawson	Yes	
Nicola Bridges	Yes	Disgraceful use of farmland/orchards. Too many people outside the area will move in, so not helping local people buy houses anyway.
Damen	Yes	Want to build houses improve the infrastructure rainham is gridlocked...be no fields left soon
Mike Hallows	Yes	Development in this area has already been refused by Government. These reasons still stand, despite the now marginally lower proposed number of dwellings, which I no doubt would increase again as part of planning amendments if this ridiculous plan were to be allowed.
Rebecca Lister	Yes	Do not destroy the orchards. Rainham can't take any more housing
Emma Vego-Brown	Yes	The roads in and around Rainham cannot cope with the current traffic load let alone more adding to it. We already have a few other sites being built on and this area cannot deal with it. Residents already struggle to get doctors appointments, with added residents this will become impossible. We pay a decent amount of council tax and t
Neil Williamson	Yes	My sister lives in the area and we've already noticed how much busier the lower Rainham Road has got with recent development. The orchards provide a pleasant environment and additional house building would destroy the peaceful atmosphere.
Deborah Lane	Yes	Please, please stop building on all our open space and adding to the traffic, school places and access to services chaos that we residents already suffer with. The drains stink as the waste pipes can't cope, we have so many power cuts as the network can't cope. It's too much, the infrastructure CANNOT COPE. Our kids are suffering, our el
Theresa Elsey	Yes	This has been declined once. Nothing has changed in fact Rainham is more gridlocked than ever. No services to support these new homes. It's a struggle already. This proposal is beyond belief. All of you please come and sit in the traffic right now. It's gridlock at work and school time. No doctors or dentists have appointments right now
	Yes	Objection to Planning Submission - Concerns Regarding Infrastructure, Safety and Environmental Impact
		Since the last planning submission, Medway Council has approved multiple medium-sized developments in the Lower Rainham Road and Beregrange area. These approvals have been granted without due consideration for the already severe traffic conditions.
		Each morning, long queues build up at the Beregrange Road junction with the A2. These often stretch as far back as the Holmorks junction, creating absolute chaos. This congestion poses a serious risk to schoolchildren crossing from Beregrange June Holmorks towards Rainham Girls', Rainham Mark, Thamesview, and The Howard Scho
James Harriott	Yes	Lower Rainham Road itself is extremely narrow and was never designed to support the volume of traffic generated by the recent and proposed housing developments. Any suggestion to the contrary should be substantiated publicly, unless the council is planning to invest in new infrastructure - potentially within the Riverside Country Park
		The environmental impact of the proposed development will be significant. The council has previously demonstrated an awareness of the importance of preserving local ecology - for example, by reducing verge cutting to allow nature to recover. It therefore seems contradictory to now permit the destruction of a large area of fertile green
		Kind regards,
		James.
Nicola Walters	Yes	I understand there is a housing need but the destruction of prime agricultural land and this development does not have the infrastructure to support this. The roads and services along lower Rainham road cannot sustain such a development on this scale. The local infrastructure of this development simply cannot support such a large scale
Michelle Holiday	Yes	This will be disastrous on every level - environment, lack of infrastructure, pressure on hospital and GPs. New builds and schools on that land will NEVER be acceptable and local
Claire Feekings	Yes	People will fight this all the way. I was surprised how many people did not know about this - because of the low key, underhand way this bid has resurfaced. I am making it my business to let everyone know about it and every person - every single person I have spoken to - opposes this plan wholeheartedly.
Dan Ward	Yes	Rainham and Teydall are becoming so overcrowded that it is now becoming a horrible place to live. The medway hospital cannot cope and neither can the Road network. Im sick to death of being gridlocked both on the A2 and the lower rainham road going from Teydall to Rainham. Cramping everyone ho london into the south east ell or
Jordan Crozier	Yes	Anyone who lives in Rainham/Sittingham will already know the devastation this will cause if this goes ahead. Common sense would look at this and say this is too much, but we're not working with this unfortunately - just greed. The traffic is a nightmare and genuinely the best time to travel is if a night-time. The green space is not only the
Leon Houghton	Yes	The road infrastructure is dated already and will not cope with the proposed increase. Lower Rainham road is already notorious for being closed due to utilities falling. Also this will driver further traffic up oterham quay lane where there is a new school(Leigh Academy) that is starting to cause heavy traffic and a danger to school children a
Rodrigo Vega	Yes	Orchards are important sites (hotspots) for biodiversity. They provide shelter and food for many insect species and other invertebrates as well as vertebrates. The land also maintains different species of plants including those found in hedgerows. No housing development would be able to achieve or maintain the same levels of biodiver
Sinead Ryan	Yes	The additional traffic from developments on Otterham Quay Lane and Lower Rainham Road is making it an increasingly frustrating place to live. There used to be so much green space to enjoy and slowly but surely it's becoming a carbon copy from one housing development to the next.
Helen Caston	Yes	I feel that there is insufficient infrastructure to support additional housing. The roads are unable to cope with the traffic we have at the moment without bringing 100+ more regular vehicles into the equation. This will be an additional squeeze on our schools, GPs, hospitals, dentists etc as well
Kathy West	Yes	Affordable homes or green spaces. Fear of flooding if no fields for water to run into. Too many cars on the roads. Not enough amenities for extra people.
		No infrastructure in place to support the excessive new development.
		Not only are the GP healthcare services already sub-par in this area (although I know there are "plans" to "build a gp's surgery" which we all know will be the last thing on the list and likely to be scrapped due to a "lack of funds or space"), the already crippled Medway Hospital which is on its knees supplying emergency medical attention
		Roads:
		The roads that were built for what was once a small village are inadequate for the amount of housing that is now being laid upon it. As much as I am aware that times change and areas do become developed, the lower rainham road is used (although not really fit for purpose) to help traffic flow freely through the town centre. When this is c
Ryan Caston	Yes	Environment : As stated before, the pollution levels in this area have risen by considerable amounts due to the standstill traffic that is created. Also, the orchards that are proposed to make way for the flats are one of the few remaining green spaces in Rainham that can help reduce the emissions in the area. Removing these trees will only worsen the problem. Environment p2: Bees are an integral part of our ecosystem and I know that there are many hives kept on the land of the orchards, not only does this give them a safe space to help pollinate our gardens and fields, they provide an award winning honey that aids residents with allergies. If the orchard is bulldozed, what happens to them?
Kirsty Mariett	Yes	
Kirsty Callar	Yes	Stop taking our fields and orchards away!
John Byrne	Yes	We need green areas.
Tina	Yes	Medway infrastructure, roads, schools, hospitals are clearly unable to cope with current population levels. Bottle necks in traffic at pump lane and lower Rainham road will be exacerbated by this development. The farm land was deemed A1 arable land, how has that changed in such a short period.
Paul Roberts	Yes	Traffic is horrendous at peak times because so many houses are being built...the hospitals, schools, not able to cope with demand it's created.
Richard Read	Yes	
Helen Louise Cook	Yes	Road infrastructure not suitable to take the extra traffic. The railway bridge in Pump lane is a pinch point traffic wise. Heavy construction traffic hitting that bridge would cripple the rail link. The amount of wildlife disturbed by this development would be a disaster. The lower Rainham road near the 3 mariners pinch point would ca use mo
J.H	Yes	Along with the destruction of wildlife habitat and the felling of healthy trees, this proposed development would add significantly to the congestion already suffered by those living in Rainham and its environs, which includes gridlocked traffic, noise and air pollution. Medway hospital is already overstretched and this would add still further to
Harry Holmes	Yes	No material changes have occurred since the last rejection its hard to imagine the destructive impact on nature, the local road network and wider infrastructure complexities especially considering the amount of remedial repairs to water, sewers, electricity and gas with the current population. Increasing that will only further increase the str
Kevin Moloney	Yes	Lower Rainham Road is already over capacity and subject to frequent closures. It and the other infrastructure such as sewage cannot cope with the increased burden.
Keely Shorman	Yes	I object to planning going ahead due to increased traffic congestion that we are already currently having to deal with day in day out in this area. Lower Rainham road and Beechings way are congested already during school times let alone additional traffic adding to it.
Javed Mughal	Yes	
James Smith	Yes	There is not enough infrastructure in Rainham at present to support more households. There is a lack of Doctors, dentists, schools and community amenities. Also traffic is getting worse each year.
Steve Goodwin	Yes	Ruining rainham the traffic will be diabolical
Claire Davis	Yes	There is no road, doctor, dental, school infrastructure built for more houses. Water drainage and electrical supplies already can't cope. Rainham can't cope with more houses.
Vicki Tilley	Yes	
Felicity Holton	Yes	This development has been called a 'village'. Original 'villages' in Kent and across England grew up where there were ideal conditions such as supply of water, employment, good routes for transport, medical care, land to grow your own food (allotments) and often a space for nature and community formed around the local church. This pr
Amry Ross	Yes	Rainham is already struggling with the amount of houses being built. Schools, doctors and roads are not made for this amount of people.
Lynne Taylor	Yes	It needs to keep important areas like this to maintain its character.
Charlotte Constable	Yes	This is not London or a dumping ground for London residents. This is Kent, the garden of England, keep it that way.
Fay Bussey	Yes	Logistical nightmare, Medway very crowded already we need more facilities as it is without many more homes being built. Infrastructure would not cope
Sophie Moss	Yes	Currently Medway has highest water rates and council tax rates. This is nit being spent on upgrading infrastructure. Until there are more or better GP, dentist, hospital, electricity and water supply for Medway with the road conditions improved to cater for the existing housing that has already taken place in the last 5 years. No more housing
	Yes	This cannot go ahead destroying green space, and our infrastructure cannot cope as it is Schools Doctors Dentists all Water services,

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Gill Ransley	Yes	The destruction of so much excellent land is totally wrong. The local services can't cope with the houses that there are already and the local roads are sufficient to cope with any more traffic.
Brenda Rayfield	Yes	This is my first time of objecting but I feel I need to because I am overwhelmed by the amount of new developments in this area. The roads already cannot cope with the extra traffic, the hospitals can't cope with the additional people, nor can the water supply, the sewage works, or the local doctors and dentists. With additional houses it will be even worse.
Lee Kelly	Yes	These roads can not cope with the extra traffic.
Dawn Talbot	Yes	We need to keep as many open spaces for bees and plants. Rainham is becoming over populated with the infrastructure to cope.
Peter Springate	Yes	Over building in the area.
Kaelia Pennellier	Yes	I would like to add this would add to the already congested area and lower Rainham Road.
Taylor Martyn	Yes	I suppose you think that land is abundant and endless, that your children and their children will prefer brick and concrete to trees and grass? But rarely has one been enlightened or inspired by the grey bleakness of development. It is in the orchards, forests, farms and fields that inspiration and devotion to life and God have been fostered. I am firmly against the development of the orchards on Pump Lane.
Helene Goldup	Yes	If you were making an educated decision, you would understand the severely detrimental impact this development would have, for all of the reasons already outlined to you. Ignorance is not bliss when you are destroying the land and everything that thrives here. Educate yourself (!) on the ethics of what you are proposing - with any luck, you will be able to make a more informed decision.
Shane Sterry	Yes	
Kally Preston	Yes	
Joanne Neal	Yes	The roads in nearby areas are already congested, we have no more green space left, too many people in the area now with new builds everywhere and one of the most important points, Medway hospital is at capacity, where are all these people going for treatment???
Marion Stevens	Yes	We need the orchards, fresh produce, it's not safe area for traffic passing through, no bus route, more pressures on water problems, NHS, Schools, and not affordable housing. I could go on all night, moving wildlife, birds, insects, reduce existing houses value.
Julie Stronach	Yes	There isn't the road structure to accommodate any more houses in Lower Rainham, not enough hospital space, no clean air, no doctors or dentists. There isn't a suitable road network for the houses in the area already, building more will make things much worse, there aren't enough Doctors nor hospital spaces for the existing people using the area.
Judi Benavente	Yes	
Sarah Hobson	Yes	I am greatly concerned on the impact this will have on local wildlife - birds, rabbits and bats. I also have concerns regarding the infrastructure locally, roads and hospitals.
Charlotte Morrison	Yes	Too small road and going to be more busy and it is a nice green area so just leave it alone.
Rebecca Sheene	Yes	I am concerned on the impacts of roads, hospital and the loss of green space and wildlife concerns.
Arla Hobson	Yes	Loss of open space and healthy land.
Jackie Dooley	Yes	Wildlife security and the traffic that will be created will not be manageable.
Emily Marshall	Yes	
Kerry Cannon	Yes	Increased volume of traffic in the local area and surrounding areas. Pollution and environmental concerns. Habitat and loss of nature. Impact on health services, children's services, adult services, police services and education.
Mark Ramsay	Yes	I grew up in Teydlah and lived there until I was 30 I'm still a frequent visitor. There simply isn't the supporting infrastructure to support new housing. Over the years there has been little maintenance done on the surrounding roads and they simply cannot cope now as it stands. If you allow this new housing to be built it will cause utter chaos.
Paula Parker	Yes	roads hospital money hill can not cope
Lesley Wall	Yes	
Mark McIlhenn	Yes	National scandal
John Vennel	Yes	We need farms as we need to eat we don't need golf courses build on them
Alan London	Yes	The land is close to the Medway estuary. A very important site for birds and other wildlife.
Stuart Miller	Yes	
Philip Fisher	Yes	This application is merely a reconfiguration of that refused by the planning inspectorate in 2021. The overriding fact is that there is inadequate infrastructure to support this application. This particularly applies to our hospital, roads, wastewater systems.
Deborah Turnbull	Yes	This development will cause catastrophic environmental consequences. The uprooting and destruction of 60,000 trees will kill wildlife and destroy the outstanding natural beauty of the area. This is a fertile land and provides abundance of quality food. We must protect this, especially with the troubles of this war torn world, we should be more self sufficient and carry on producing food to feed our ever growing country, no point in building more homes if we cannot feed the residents. The area's infrastructure will not be able to cope with this development, it is already struggling as it is. It will also result in more air and noise pollution. It must be stopped.
Amanda FOREMAN	Yes	
Chris James	Yes	This would displace over 100 million bees which would all die because they would have nowhere to go. We need the bees otherwise we will die.
Matt Stephens	Yes	Living in Teydlah, there is very minimal green space nearby. That is one of the very few places within a short walk where you can feel a sense of peace and serenity, whilst living in a very built up urban area.
Sarah Kelly	Yes	It's also not good for the environment and the wildlife that we have nearby which is already greatly depleted.
Jo Elsmore	Yes	I'm someone who struggles with depression and I'd find it incredibly depressing if that land was redeveloped. I understand there is a need for a new housing, but it should be carefully thought through and new housing developments shouldn't just be put in places where there is already very limited green spaces. I really hope this doesn't go ahead.
Annette Mooney	Yes	The community woodland, the allotments and the orchards form a natural corridor for wildlife which joins with the SSI & community orchard. Riverside on the other side of Lower Rainham Road. Any development here leaves marooned, small and degraded habitats for wildlife. People from Rainham and Teydlah regularly use routes through the woodland and orchards to get to the river and the sea. Any development here would be a betrayal of all environmentalists and the community who have lived in this area for centuries.
Francis Booker	Yes	My biggest objection is to the loss of a near continuous green space between Rainham & the estuary. The loss to wildlife and wellbeing is unacceptable and will mean further development is impossible to prevent. The destruction of habitats, wildlife pathways and the additional noise and airborne pollution would be a betrayal of all environmentalists and the community who have lived in this area for centuries.
Daisy Flack	Yes	The lower Rainham Road & surrounding roads are congested every single day at present. Building more houses the roads will be at a standstill. The local hospital Medway is struggling and it's difficult to get a GP & dentist appointment now!
Nicola May	Yes	The houses will be unaffordable for local people. We are losing nature & surrounding green areas. It's local GREEN. Not caring for the mental health & wellbeing of the people who live in this area. I am formally objecting to this proposed housing development. The impact to the area will cause the destruction of natural habitat for wildlife.
Mrs Parish	Yes	
Steven Green	Yes	The nearest road, Lower Rainham Road, cannot possibly cope with all the extra traffic that would accumulate. If there is a problem with the M2 shutting then all the roads in the Medway are swamped and totally gridlocked. It was a severe problem and will only be made considerably worse. the homes will not be affordable and as there is no other way to get to the town, the area will be cut off.
Philip Limal	Yes	The roads and infrastructure are not in place. Lower rainham road constantly has closures and the whole of rainham and gillingham come to a standstill. Build on brown sites not orchards this country is being destroyed.
Antonio DiStefano	Yes	
Marie Fullagar	Yes	I believe that the infrastructure is insufficient, not enough GPs, dentists, The hospital which covers Gillingham, Rainham, Chatham and Swale can not cope now, and with the planning for more housing will simply push the service to fail. The fauna and flora, and the wildlife is hanging on by a thread and will be disseminated. The idea of a new housing development in this area is a disaster.
Shelley Payne	Yes	I am concerned about more traffic in the area it is already so busy on the roads. I am concerned about the impact on Medway Hospital. It can't cope with more patients.
Michaela Perez-Ward	Yes	We are struggling with traffic and medical services as it is. Our wildlife is being destroyed. Lower Pump Lane is narrow, Lower Rainham Road is so full of cars. Please leave some of Rainham's beauty for my children to enjoy.
Dee Richards	Yes	The infrastructure around Rainham cannot sustain any more traffic than we already have due to constant roadworks, gas works, waterworks along lower Rainham road and when M2 shut is gridlocked. The houses that have been built are far too many as it is. This used to be a pretty village now being overrun with housing and not enough schools. Doctors and the hospital at Rainham is at breaking point with no beds available, patients now lying in corridors and sitting on chairs not acceptable. This development is one too many.
David Kellar	Yes	It has been suggested by the developers and other parties that there is no major problem with existing traffic flow and that further development will not have a significant impact on the Lower Rainham Road. It was also claimed that there is a good bus service on this road. Both statements are incorrect and go to show that these people are on another planet.
Kathryn Heather	Yes	There is already significant air and noise pollution on the roads in the Rainham area because of the very poor road infrastructure that is seriously affecting the wellbeing of residents and therefore makes further development totally unacceptable.
Clive Heather	Yes	I object to the loss of this agricultural site that not only provides food but the 'green lungs' for our area. Our roads are already severely congested at times and this must cause huge frustration to families trying to travel to work whilst dropping off children at school or to children. Also the increased traffic causes the air quality to deteriorate.
Lisa Atkinson	Yes	I object to the tearing down of the Pump Lane orchards. These provide valuable agricultural land and the 'green lungs' for our area. Rainham is becoming over-developed and we have neither the road network or health services to support this expansion.
Wendy White	Yes	We already have new developments all along the lower Rainham road which makes the traffic unbearable. I will be moving directly opposite this development, which is on a bend with 2 lanes either side that cannot cope with traffic now. Most of the wildlife has gone! The noise from a school will be unbearable as there is already a school just round the corner.
Michael White	Yes	
Peter Walker	Yes	Having lived on the Lower Rainham Road for approximately 40 years we have seen it gradually transformed from a country lane to something resembling a racetrack!! ENOUGH IS ENOUGH.
Nigel Gilson	Yes	This has previously been objected to as it is Grade 1 agricultural land. In addition to this, there is not enough infrastructure (e.g. ability to handle) to the extra cars that these houses would bring to the roads, school capacity, only having one hospital with an A&E in Medway which is consistently full and already has a backlog. Medway cannot cope with any more houses.
Sharon Russell	Yes	
John Gilson	Yes	Apart from being important places for wildlife and food, the sewers are coming to the end of their life and under size for the needs of a growing population, the water supplies are under size for a growing population, the electric grid is also under size for a growing economy and the roads where built for horse and carts. Before building new homes let's get the infrastructure right first.
Ray Holton	Yes	I worked in the construction industry for 30 years - including World Heritage and planning for the areas that may have an impact on the whole project. Before jumping in feet first. By the way, driving cars and lorries on the pavements causes the ground to subside and the services to flex eventually breaking down. This is why we have leaking water pipes, gas pipes broken and the electrical cables shorting out.
Michael Sewell	Yes	People who build houses do not always have the people with the expertise to see the whole picture. Given recent seemingly uncontrolled housebuilding north of the railway line, where will it end? One urban sprawl from Otterham Quay Lane to Rochester Bridge? There MUST be green spaces and to sanction building on this agricultural land would be an environmental crime. The Lower Rainham Road is already too busy, and the infrastructure is at breaking point.
Kathleen Sewell	Yes	Rainham is grid locked already, pollution is at its highest point ever, noise levels are rising and the council can't repair roads so it is without more traffic. Rainham life has been destroyed and with the destruction of our orchards will increase the carbon footprint of our fruit! THOUGH LOCAL COUNCILS WERE TRYING TO CUT EMISSIONS! Not sure.
Elaine Harper	Yes	Pollution levels going up, Rainham is completely destroyed, it's become dirty. This can't get about, roads are gridlocked, doesn't feel so safe to walk about. Destroying orchards, wildlife, places for people to walk I could go on.
Jenny Thorp	Yes	There are insufficient amenities locally to support such a development. The local town centre of Rainham is not fit for purpose and the lack of GP and dentist availability in the area is astonishing.
Frances Pitcher	Yes	The development will be dependent on car journeys as the area is not well supported by or suitable for public transport.
Ann Jeffery	Yes	The road has been a congestion hot spot for many, many years - the building of new houses and a school is really unsuitable for this piece of land.
Lisa Carter	Yes	In addition, this is a valuable piece of land for the local community and wildlife. It is a vital lung and wildlife highway, without it there will be a huge impact on the ecosystem with many insects, birds and small mammals being forced out or killed by this decision.
Tracey Cook	Yes	This is not a suitable site for a development as the road cannot be made any better than it is.
	Yes	There are plenty of brownfield sites in Medway that should be considered first before any prime agricultural land is destroyed.
	Yes	I am deeply concerned about the impact on our already busy gridlocked roads.
	Yes	I don't think we should lose our beautiful footpath walks through the designated area.
	Yes	The local infrastructure is already at breaking point. With the housing development already going ahead, and this re-proposed development, Rainham will be gridlocked. We have already experienced this with roadworks due to other local developments causing traffic on the local roads to come to a standstill. Our local hospital cannot cope with any more patients.
	Yes	This 'affordable' housing proposal will not benefit local people as the price of the houses they set are out of the local young person's reach forcing our children to rent or move out of our area, away from friends and family. We have seen this unfortunately with the other numerous developments in and around Rainham.
	Yes	When food prices are high the destruction of a perfectly viable food source is abhorrent. We should be encouraging farmers to keep crops, especially with climate change.
	Yes	What was once a beautiful village is now turning into urban sprawl.
	Yes	These orchards provide key habitat and wildlife area in an over-developed area. The lower road cannot cope with any more traffic which this proposal would bring. The hospital is not coping with all these huge developments bringing thousands to the area, its putting lives at risk.
	Yes	The sewage and water supply is not coping and this will put it under huge strain. This development will destroy valuable versatile land, needed for food security, the infrastructure is not there to support such a development and the huge amount of cars it will bring. There is no scope to improve the road. It's already not coping with the traffic.
	Yes	Consider traffic accumulation & endangered wildlife, not to mention Kent is supposed to be the garden of England.
	Yes	These Orchards need to stay for many reasons, the council should put a stop naming what is left of our countryside.

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Jan Wilson	Yes	Against the destruction of good fruit producing orchards. I Destroying wild life, trees, hedges, wild flowers and fruits, nesting trees. Against the be fact of the increase in traffic, in the already busy areas There's already no foot path along Pump Lane, which youngsters are to walk to and from school, with cars travelling up and down a narrow lane. Against as builders don't keep their promise of... new school, doctors, shops.
Melanie Stockey	Yes	The loss of all the trees will be catastrophic. Roads not able to take all the traffic now so even more (at least one car for each new house built 🤯) disastrous! Already risk that Southern water can't supply existing residences in draught times. Always NHS can't cope with the population now especially Medway hospital.
Laurel London	Yes	
Alan Grace	Yes	
Jemma Boorman	Yes	
Gillian West	Yes	
Jill Powell	Yes	
Nicholas Reynolds	Yes	I believe this development is totally unsuitable for the area. This is one of the very few historical areas of Rainham. With very narrow roads that can not be expanded due to the very old buildings there. This has been deemed prime agricultural land and has been so for centuries. This land supports wildlife within this area and is totally shortchanged for the council to put this forward again. This despite it being fully investigated four years ago and coming to the conclusion this should not go ahead. There are no changes that make proposal suitable, just permanent, irreparable damage to this beautiful part of Medway. I know the reason for the proposal, including greed on the part of the landowner, but the people who live here will suffer the loss of green space and the damage of a further fifteen hundred addition vehicles in an already highly congested area.
Christine Pearce	Yes	
Stacey Planson	Yes	Rainham is busy as it is with traffic at the moment roads will be a complete disaster if this goes ahead
Jenny Rockett	Yes	Pump Lane is constricted in its width by the railway bridge. There are no footpaths. Lower Rainham Rd, Beechings Way and the A2 are at full usage. The Medway Maritime hospital is at breaking point. The water companies have admitted they can't cope with any more housing. Doctor and dentist appointments are non existent. Medway is
Sally Periss	Yes	The roads, schools, infrastructure and medical facilities in the area cannot cope with the new houses being built now. Let alone any more being planned. The area will be an awful place to live if this goes ahead, for the reasons above, and for environmental reasons too, including the loss of even more green space and agricultural land, and
Richard Periss	Yes	The proposal was turned down previously and with good reason. Whether the new proposal is for less homes is irrelevant, every argument from previous remains valid. The area cannot support further development, the main point being Lower Rainham Road cannot handle current capacity, let alone more
Jacqueline Farnen	Yes	The infrastructure is not capable of coping with extra traffic on a single carriageway country road which is often closed. Schools, doctors, hospitals etc are already overstretched. Rainham does not have the infrastructure in place for the current homes & residents, these new houses will add to the problem & take away another green space
Clare Gills	Yes	
Marion Savaraut	Yes	
Jorge Hugo Burgos Saa	Yes	
Diane Easton	Yes	
David Easton	Yes	
Gerald Barwick	Yes	
Pauline Barwick	Yes	
Andrew Hopper	Yes	I see that the proposal includes a new secondary school. Why? We have four schools within 2 miles of the orchards. The council say things have changed but if the land was not suitable then it is not suitable now. Delay this as long as possible and when labour get kicked out in two years it will hopefully be dead in the water
Jo Sage	Yes	An established orchard like the one in Pump Lane is an incredibly important habitat for wildlife, including many rare/ endangered species that live near the River Medway Estuary. If this biodiversity asset is destroyed, it will further fragment already degraded and vital wildlife corridors across Kent & Medway. As a long term resident of Rainham, I have seen the over-development of my town in recent years, which has already changed the character of the town and its community for the worse, resulting in overwhelmed local services, gridlocked roads and high levels of air pollution, which threatens the health of both local residents (and especially children). This development is unsustainable, with our already overwhelmed roads, infrastructure, hospital/ local healthcare services. I understand that local people need housing, but there are thousands of empty homes in Medway, along with former industrial brownfield sites that would be far less damaging to develop into housing than prime agricultural land. I am shocked that it is back under consideration - it is wrong on so many levels.
Sarah Warren	Yes	The roads will not be able to cope with another 750 houses, the schools are overflowing, the hospital is at breaking point and no doctor's appointments. Taking this green space will be detrimental to the local area.
N Miller	Yes	
Laura Boucher	Yes	Lower Rainham Road is already heavily congested, the infrastructure cannot cope with the current amount of properties surrounding it. There are often numerous power cuts within this area as the network can't cope. New houses have been approved via the planning inspectorate on appeal in the past and this has turned the area into an
Paul Noman	Yes	The impact of all the extra traffic on an area that's already saturated especially during school runs would be horrendous. All that extra pollution when we already border Chatham which has one of the poorest air qualities in the whole of the UK. Plus if the school isn't built they have already said the land will be taken up by even more houses,
David Patemoster	Yes	The area already can not cope with traffic, insufficient schools and medical centres.
Samantha Kemsley	Yes	The building of 750 more houses is madness. Lower Rainham Road is struggling as it is. Hospitals are crumbling under pressure, children are on long waiting lists for local primary schools. We don't need more houses and more people and more traffic and more pollution.
Sarah Daley	Yes	The roads are horrendous already, with no improvement to lower road this idea is ludicrous. To add to the already gridlocked rainham.
Jennifer Ward	Yes	I was born and bred in Pump Lane, Rainham, leaving when I first got married in 1973. I still visit family in the area and each time I visit I see more destruction of the countryside. As a child I was always led to believe that agricultural land below the railway line would never be built on. We still need that agricultural land. Im also sure the road
Glynis Whatman	Yes	
Vivienne Rudd	Yes	It is irresponsible to even consider (yet again!) the destruction of prime grade one agricultural land. The suggestion in the revised plans for a school, a doctor's surgery etc is a well known ploy to get permission granted, when we all know these will NEVER appear
Helen Harland	Yes	
Caroline Crouch	Yes	There is not the infrastructure in place for more dwellings and more people. We need a bigger hospital, more GPs, more NHS dentists. The surrounding roads are regularly gridlocked and not suitable for the increased volume of traffic that would be using the roads. I'm sure the water situation will suffer adversely. Southern water have regularly discharged into the sea and obviously can't cope with demand at the moment. It will damage wildlife both on the proposed build site but will have a knock on effect at riverside and further along the estuary. It just isn't a viable build site.
Caroline	Yes	This area of Kent has had so much building without the required infrastructure upgrades. The traffic is congested due to this, particularly for commuters using the surrounding road networks i.e the A2 into London people need to commute to afford to buy the houses & public transport is too expensive & insufficient for commuting purposes
Shawn Challis	Yes	
D Moore	Yes	Out infra structure is already at breaking point with the thousands of new homes already being built, lots are still unsold and too expensive Both the Lower Rainham Road and the A2 are often gridlocked and whenever there is an accident on the M2, which happens often Rainham is at a standstill and no one can move anywhere. These roads even if the money was available cannot be widened and pump lane is just that... a country lane. The Medway Maritime Hospital is already broken and has been for a few years, it is the only hospital attending to a huge area, not just the Medway Towns. Rainham has just 2 local chemists plus 1 in Tesco's Gp surgeries can't cope and schools are under pressure... there are no NHS dentists with vacancies. The council would not have rejected this plan lightly as the income in tax would be valuable, but it really is a non starter... Rainham just cannot cope with the increase in population and cars on the roads.
G Moore	Yes	The whole of Rainham just cannot cope with any more housing... more infrastructure is already desperately needed and its not happening. God help anyone who needs Medway Hospital it is biblical... totally broken, that's when you can even park to attend appointments on time. The fact that it is even being considered is a crime. There are still lots of overpriced new builds still for sale Our council should not have to agree to social housing being built as a London overflow for their homeless when we still have our own... disgraceful
Daniel Crouch	Yes	With only a finite area of green belt land still standing, why not prioritise purchasing and processing the derelict brown sites dotted throughout the county. Stop destroying green and start developing brown. The local area already lacks in fundamental infrastructure. Schools are crowded, doctors don't have the capacity for new patients, the Take a hint from the previous attempt. Just don't keep destroying our local area with overpriced paper houses. No one benefits but you.
Craig Taylor	Yes	The local infrastructure i.e roads, gas, water and electrical would struggle to accommodate the vast number of properties. Unless, our sewage, water and other amenities were to be upgraded prior to this project.
Tracy Gemmell	Yes	
Sarah Gemmell	Yes	
Gill Powell	Yes	The infrastructure in this area is already under pressure, especially with road closures which happen frequently. The thought of maybe two thousand more cars on local roads is terrifying. Doctors' surgeries are at full capacity, as are dentists. Medway Hospital is under immense strain with the amount of people it serves. How on earth can they cope with even more potential patients?
Maria Chittock	Yes	Roads can't cope with the traffic now let alone the increase more houses will bring. Air pollution will be higher. Our green spaces are rapidly disappearing and will reduce locally grown produce. Why not utilise the empty buildings that already exist. Improve road infrastructure, reduce parking cost and encourage better shops so our town ce
Nicola Thomas	Yes	Rainham is cover crowd we need the country side think of the effect on climate change taking yes to you just a small number of trees but it soon adds up, kent was the garden of England now just a concrete jungle
Helen Cook	Yes	This was rejected by the council previously, there has been no positive changes made to the impact to local people, traffic, wildlife and the environment, and Rainham simply cannot support yet another development of such size. I strongly object to the destruction of good quality agricultural land to build houses. There appears to have been
Angelo Filippone	Yes	Sort out all roads before you box us into Rainham. No more building till you sort out the roads gas water and waste
Jo Harwood	Yes	This area cannot sustain any more building. It is already overcrowded, lacking in services and run down. I have seen Rainham deteriorate rapidly over the past few years. Traffic is horrendous and the roads are in a mess.
Brett wilson	Yes	The roads around Rainham & Twydall cannot cope with the volume of traffic as it is without more vehicles on the road, no doctors or dentists and tge hospital is a joke, we simply cannot accommodate more people.
Natasha Arintoul	Yes	Roads becoming more busy, will need a doctors, schools.
Susan Blake	Yes	To build on the orchards will impact on the amount of traffic it will generate for both upper pump lane and lower Rainham road especially when either road is closed... also the foot traffic which can be dangerous as there are no footpaths in lower pump lane...
Lesley Edwards	Yes	
Shella Bainbridge	Yes	
Heidi Nightingale	Yes	The total impracticality of this abhorrent proposed destruction of yet more beautiful landscape needs to be considered.
Sarah Tindi	Yes	We do not have the road infrastructure to deal with this number of houses. The roads in rainham are often extremely busy and thus would cause extra pressure to the current roads. It would also result in an increased level of pollution in the local area. Its clear that the Council does not have any regard for the residents of Rainham if you g
Maggie Morrissey	Yes	I objected to the destruction of 126 acres of grade one agricultural land and associated development four years ago. Since then there is even more reason to object to this development. There has been considerable in-fill development in this area which partly accounts for the increase of traffic I experience when going to my allotment in Lower Broom Lane. This must mean greater inconvenience and pollution for the existing residents. Due to the geography of the area with the railway line one one side and a narrow road un Although our country needs more affordable housing it also needs to provide more of it's own home grown food particularly given the unstable nature of the world currently. This land under consideration is grade 1 agricultural land and too valuable to lose from food production. Councils adjoining Medway intend to build huge developments on the borders of Medway which will place even greater strain on Medway infrastructure especially Medway Hospital which is barely coping currently. The objections I made 4 years are still valid: loss of wild life habitat, loss of green spaces vital to human health, dramatic degradation of the historical character of the area, lack of capacity in the infrastructure (doctors, dentists, water, sewerage, electrical power provision) of the area but 4 years on is even more critical.
Ann Roffe	Yes	
Gary Barnes	Yes	This is huge development built between the narrowest roads in Medway, roads that are so busy before any development! Also our community struggle now to get Hospital Appointments, another 2500 plus will only aggravate the situation. I also think that an enquiry should be made to Southern Water re supplies and Sewerage.
Dave Stickells	Yes	The area has been swamped with new houses the infrastructure can not cope now please don't add more. 1000s have already been agreed in this area we don't need or want any more

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John Hewer	Yes	Although I do not live in the area I have been spending an increasing amount of time on a regular basis and more so of late in my latter years to visit and spend time with my extended family some of whom are very young. During the last few years the volume of traffic has increased dramatically to dangerous levels, particularly so in Pump Lane. I could NOT AND DO NOT SUPPORT the proposal.
Mandy Watkins	Yes	John Hewer.
Carol Jarrett	Yes	There is not the infrastructure within Rainham to support this amount of extra people. The roads cannot cope, the trains are already full going to London in peak times and the hospital cannot cope.
Tina O'Sullivan	Yes	To much traffic and air pollution, theres not enough GP, schools or Dentists or police, will add on pressure to community affecting wild life, selfish to keep building on precious land
Daniel O'Sullivan	Yes	There no school & no doctors now you can't get a appointment please enough is enough put in place extra school & doctors tge traffic coming through pump lane is bad so no
Diana Weller	Yes	
Elaine Nutton	Yes	Having green areas is important for my mental and physical health.
Shawn Doyle	Yes	There is an insufficient road network to accommodate more housing. It can take 30 mins to drive from the village of Upchurch and Lower Halstow, a distance of less than a mile, 1.842 acres, 3 rains 8 months a year and we have water shortages every summer. That's because the water table cannot support the population. The Thames is
Derek Green	Yes	
Teresa Webb	Yes	This development shouldn't be allowed, although there are 500 less houses everyone knows the other facilities won't be built and the additional houses will be built. The land is still prime agricultural fields with an abundance of wildlife and should stay that way
Melanie Loader	Yes	Lack of hospital beds, doctors and dentists!
Stephen Loader	Yes	
David Pay	Yes	Building on beautiful orchards is outrageous.
Andy White	Yes	There are more suitable sites.
Deborah Summers	Yes	I have lived in Gillingham since 1966 and I have a heartfelt belief that our rural areas/farm land/orchards etc have enhanced the urban sections of what we now call 'Medway'. But now we are faced with the numerous INSIDIOUS developments upon our beautiful countryside which is not only detrimental to the wider environment but in time
Alan Carnfield	Yes	This is top grade farmland, we cannot lose it forever, with ever increasing population levels we need to produce more of our own food locally! Pollution levels are unacceptably high now, this will exacerbate those levels, with much more traffic resulting from this plan. The Lower Road is suffering from much increased traffic levels due not just to the extra housing developments already built, but also those from nearby areas, such as Newington, Otterham Quay Lane, Mierscourt etc. The loss of green space is catastrophic, the green buffer in this urban area is vital for the health of locals, mental health as well as reduced pollution levels for breathing. I was staggered to read that when the Great Lines was proposed for development, it was rejected and the point made that London has more green spaces than Medway. That was 20 years ago, that statistic is more potent now with the huge level of developments Medway, and especially Rainham, has suffered. And lastly, those with no voice will die and be gone forever from this development and they are the wildlife. The government says it is serious about the drop biodiversity levels in the UK. If this appalling development goes ahead, nature is once again forgotten and sent into a further downward spiral. Death to nature is the real loser here, not the rainham residents. This is an obvious reaffirmation of my previous objection... in light of the damage to people's health, destruction of nature that can never recover, and loss of valuable farmland, all amplified and more important than the last time I objected. It is madness for this to be proposed, it needs to be removed from any plans for good
Dean Caston	Yes	
Allan Webb	Yes	
Glen Cook	Yes	Some of the reasons this was first rejected by the planning inspectorate, which concerned infrastructure have, if anything becomes worse due to inappropriate developments nearby. To now include the very same land for development is perverse.
Allison Small	Yes	This is an area of outstanding beauty, part of the beauty of Rainham/ Teydall. We already have more new houses than the infrastructure can cope with, no dentist spaces, very long waiting times a Medway hospital A&E, not enough doctors. A sewage system at bursting point, roads simply not made for the amount of traffic already using
Elizabeth Green	Yes	I suffer from asthma and the pollution from traffic constantly at a standstill is causing so much pollution, and things will get SO much worse with all of our green spaces going. We have so many new builds in Rainham now and the traffic is horrendous, I really don't recognise the place anymore everywhere you turn and on every space no more
Nicola Mahoney	Yes	
Heather Jupp	Yes	This Development would have a negative impact on the area, destroying agricultural land which provides a habitat for wildlife and pollinators. It would increase pollution and destroy thousands or trees which are so valuable in the fight against climate change. There is also insufficient infrastructure to cope with the additional traffic and pollution
Wendy Newman	Yes	Too many houses have already been built in this area without the relevant infrastructure being put in place, the lower Rainham road, hospital, doctors etc have not got the capacity for more cars and people
Grace Jupp	Yes	
Michella Cull	Yes	I can't think of a single reason as to why this development should go ahead particularly as it was previously rejected. No should mean NO! Reducing the number of properties to be built shouldn't change the outcome of the planning decision in this case. All the objections from 2021 are even more valid than they were then.
Shane Sterry	Yes	
Vincent Brown	Yes	Environmental impact, infrastructure will not support the extra housing and facilities, This area is not going to cope with extra residential areas or services
Lisa	Yes	Please protect our green land for the future im scared for my kids there will be no greenery left soon
Patricia Whiting	Yes	
Sophie Barfoot	Yes	We currently live on Russett Farm which is in the centre of the huge development being proposed. I have lived here for 6 years and already know the infrastructure in Rainham cannot cope as it is, let alone with a development of this size adding extra pressure. The farming land was deemed the best quality land for farming 6 years ago, and
Natasha Malem	Yes	Medway hospital is already at capacity, I recently had a baby, and the service received was far from adequate due to the hospital being completely full of patients and there not being enough doctors to get round to everyone in an adequate amount of time. Again, this development will add more pressure to an already struggling hospital. The area is a natural green space where the natural world can thrive.
Hannah Soane	Yes	
Scott Fraizer	Yes	
Hannah Hall	Yes	
Suzanne Chappell	Yes	
Thomas Blondrage	Yes	
Daphne Home	Yes	
Lynn Cass	Yes	I object to the proposed loss of prime agricultural land, we already have gridlocked roads around the proposed site. 750 homes will probably mean at least 1500 more vehicles on the roads. The new homeowners will have moved in by the time the new schools have been built, so those who have school age children will already been enrole
Michael Hillert	Yes	We are one of the most nature depleted countries, token promises of green spaces & habitat preservation rarely materialise. I'm a 5th generation Rainham resident & can't believe what has happened to what was a lovely place to live. There are too many people & not enough infrastructure already lower Rainham road has tankers backed up
Matthew Lawrence	Yes	Pump lane and adjoining roads are not suitable to accommodate construction and delivery vehicles for the period of this development. The development on flood plains, the added pressure on all utilities, the road system is already struggling and the added pressure of no extra doctors or hospitals and the destruction and problems will cause for all the locals. I would like this development removed from the local plan because there is no infrastructure in place or planned to accommodate another 1400 cars as most households now own two cars and likely only 1 space allocated so where will the other 750 additional cars live? park. The Lower Rainham Road is already choked with the additional cars. Also the healthcare is limited having had originally 5 hospitals with now only one which is totally over capacity and has patients being left in corridors due to no bed availability. My surgery alone has over 5000 patients with only three doctors. Appointments at my surgery are generally a 3 week waiting time to see someone face to face. We have youths coming from outside the area to attend our schools leaving no spaces for local children. I hope the Inspectorate sees sense and rejects this and removes from the local plan.
Karen Batchelar	Yes	We are losing too much rural land to housing. The infrastructure in the area is already under pressure. Rainham's infrastructure cannot cope with the number of people already living here. As for the volume of vehicles, the roads already experience regular gridlock. Drs/dentists locally are already over subscribed and appointments are impossible to get. The whole area will be gridlocked and we do not have enough places in schools or Dr surgeries to cope
Jane Cunningham	Yes	
Pat Emerick	Yes	
Louise Owen	Yes	
Eric Hatfield	Yes	
Stephen Sandy	Yes	
Stephanie Hann	Yes	Lack of current infrastructure and services to accommodate these extra homes.
Tracey Simmons	Yes	The lower road is already so busy without the extra cars. Also very concerned about the lack of good Doctors, Dentist, schools etc for all the extra people. That's aswell as destroying the natural habitats for many birds and insects.
Karen Culmer	Yes	The distraction of 60 000 trees, the wildlife that will have their homes destroyed/ grade one agriculture land that can never be regained once covered in concrete, the road networks can't cope with the amount of homes we currently have/ the location is not close to a station which will force residents to drive AND it's a battle that has been fought and lost
John Paine	Yes	
Lucia Lacombe	Yes	
Eric Driver	Yes	
Denise Driver	Yes	
Chloe Willing	Yes	The roads traffic can't cope as it is, the traffic is causing issues with getting anyway out of rainham and risk to children going to school. If we are looking to build on this area it should be for beneficial reasons such as a hospital, Medway hospital is so backed up and the standard of care is being lowered due to the never ending increasing pressure on the system.
Owen O'Dowd	Yes	Temporary accommodation is mentioned, what does that mean, temporary for parents and children. If so why not build proper low cost units for rental for locals. Or could it be a dumping ground for immigrants. There have been reports of men, larking and drinking in Motney hill area
Gary Teague	Yes	There is no point in building a medical centre, when my local practice, according to the manager has four GP vacancies she cannot fill, so where are any new GPs going to come from? Furthermore it is not just the orchard trees that presumably would come down but the trees that border the railway line. I was under the impression trees so close to the railway line would be protected.
Sandy Hartley	Yes	These orchards are integral to the character and history of the local area. Once destroyed they can never be replaced. They should be preserved and cherished as part of Rainham and Medway's unique characteristic and charm.
Jemma Lilly	Yes	No infrastructure, so many green areas ruined already. Will cause more delays on an already busy road. Killing more wildlife
Graham Lilly	Yes	Rainham can't cope with what it has already.
P E Peck	Yes	As with so many other people, we in Rainham are being asked to lose more of our open spaces to buildings. There have been no new Sewerage updates, no new Doctors, Dentists, and certainly no improvements to the roads and parking. Our hospital is already at saturation point. If a new hospital is built, where are they getting the Doctors, Nurses, etc? It's a disaster waiting to happen.
Deanne Tring	Yes	There will be no extra doctor surgery's or schools to manage all the extra people in the area. Roads are busy as it is
Nick Taylor	Yes	There is no infrastructure put in place along with the loss to wildlife
Jason Cass	Yes	
Natasha Douglas	Yes	There has already been so much Greenland taken from our area. Please no more. Our roads cannot cope, our air pollution is worse than Bangkok city some days!
Sylvia Adams	Yes	My objections are on the grounds of destruction of the wild life, erosion of the environment, more pollution from the amount of cars per household and using a narrow country lane with no pavements for footfall to and from schools, no extra infrastructure in place like hospital GPs etc. The Lower Rainham road and surrounding roads are already overloaded at rush hours so this amount of proposed houses is unsustainable. Im against the planning because there is not enough infrastructure in place to support the addition of another 750 houses and 750 families and probably twice as many cars. There will be no extra GP surgeries, no extra schools, no extra police, no extra fire stations, no extra bus routes, no extra shops, no extra parks, no extra green spaces, no extra anything. I also feel the environment will suffer with more pollution and the wildlife on the farm will be pushed out and lost.

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		Yes	Flattening and concreting over even more green space will take away the Natural Water drainage... leading to flooding... the local water treatment plant cannot cope as it is... I'm seeing dozens most large HDV liquid tankers damaged the lower rainham road, clearly full with 'who knows what'... The lower road infrastructure is not able to cope with HDV's. It has a 7.5 tone restriction for a reason... destroying perfectly good agricultural land.
Laurence White		Yes	No safe foot paths... more traffic... more damage to roads More roads the council has to pay for repairs We've been having power cuts lately... more disruption...
Brian Hughes		Yes	Too much building on our green spaces - too much traffic added to already busy crumbling roads - no space in the hospital- no care homes schools all full, doctors all full, dentists all full, insurance premiums will go up no doubt crime rates will go up- just NO!
Michelle Thompson		Yes	Rainham cannot take anymore people and their vehicles. Or the blatant building on good fertile farm land. Please farm land serving our community.
Terry Wells		Yes	This is only going to exacerbate the local issues with health care, environmental destruction, traffic pollution,
Sandra Chapman		Yes	
Thomas Wallace		Yes	The surrounding roads simply cannot cope with the extra traffic this development would produce. The infrastructure cannot cope with a development of this scale. Roads are already congested, and the extra cars this would add will make the air quality decline considerably. The proposed development is near two schools and the pollution
Laura Travel		Yes	I object to the land being turned from orchards into housing. Rainham cannot sustain further houses and residents, the roads, education and health systems are already at maximum capacity.
Imy Tong		Yes	It will negatively effect the environment.
Han Chapman		Yes	This would be a gross destruction of wildlife habitat and would lead to an increase the already high levels of traffic fumes in Rainham. The roads cannot cope now, which are set to get even worse with the new developments at the bottom of Station Road, and under Swale Council by the Three Sisters pub on the pear orchards
Dave Sage		Yes	I object to this proposal as it is reality is manifestly no better in its design than that which was refused in 2021. In fact it's impact will be worse due to the additional houses that have been built or will be built in the immediate area.
Adrian Taylor		Yes	This proposal has a worse impact than that which was refused in 2021 due to the fact that considerable extra houses have been built or will be built in the Rainham area and adding an extra 750 is quite frankly madness.
Tina Taylor		Yes	the surrounding amenities like schools and hospital cannot cope with additional capacity of planned expansion. Roads here are already at capacity. blights the view and destroys current environment
Koon-Shun Tung		Yes	This has already been turned down by the Inspectorate. Nothing has changed and the same reasons for refusal still stand
Kerry Tester		Yes	I am objecting due to the wild life that will use their natural habitat I am objecting due to the extra about of traffic that would be using lower pump lane and the lower road
Linda Cass		Yes	
Sharon Boyle		Yes	Without the relevant infrastructure improvements/ developments further housing development will be unsustainable. Roads, schools, hospital capacity, doctor availability ,water supply and sewage are all under pressure. currently additional human demand will make the situation even worse. Consideration to the development of prime
Julie Wickman		Yes	Local transport infrastructure and health facilities are unable to cope with this level of development. In addition the loss of even more habitat for birds and invertebrates will have a highly detrimental effect on wildlife in the area.
Irene Hoare		Yes	
Roy Davis		Yes	
Victoria Marchant		Yes	Don't put greed and profit before doing what's right. No way on God's earth that this orchard should be destroyed for more housing.
Pamela Knight		Yes	
Collette Stevenson		Yes	Too much land has been earmarked for housing in this area, without consideration that the roads are already blocked with traffic most of the time. No extra services provided - our hospital, GP practices and pharmacies already cannot cope with the number of people that they have to deal with.
Helen Harris		Yes	Gothams used to be farmers and farmers used to protect their land. Now they are just out to make loads of money from the developments. It's actually a pleasant walk down that way at present. Lockdown taught us how precious the green spaces of Medway are, but I feel we have learnt nothing now. I was told many years ago that all of lower Rainham is earmarked for development. Sadly the person was correct. Very sad. Destruction of countryside which we have so little of here. More cars when our roads are always blocked with traffic. More strain on the NHS and chemists Over the years, there has been a big increase in green land and farming land. I am against planning. This is a big concern for not only the natural environment and wildlife but those of farmers who need this land Kent was named Garden of England for a reason. Please please reconsider using such land for building purposes please keep this building free for younger generations to enjoy as well as wildlife
Emma Smith		Yes	The local surrounding area already struggles with the amount of traffic and lack of infrastructure. The original reasons for the previous planning to be rejected still stand
Julie Oliver		Yes	No infrastructure.
Carol Youens		Yes	No infrastructure to cope with all the extra houses
Trevor Youens		Yes	So much agricultural land has already been built on in Medway. The Medway Towns is becoming an area of miles of buildings with very little natural space. The trees on this land are an incredibly valuable resource to the area. In a time of increasing climate change to remove thousands of healthy productive trees goes against all we as a
Ruth Dyke		Yes	Leave our orchards alone we do not need more houses
Maria Adams		Yes	
Becky Kenny		Yes	
Trevor Loveridge		Yes	The surrounding roads do not cope with the current levels of traffic so it will become intolerable if this development goes ahead, the general infrastructure cannot sustain this proposal
Amanda Reely		Yes	To build on a historical site, putting extra pressure on the existing struggling infrastructure and resources would be devastating for the local area. This clearly has not been thought through properly nor have the issues that will arise from such a development.
John Coppen		Yes	Medway Maritime Hospital and GP practices already struggle to cope with the existing local population. The proposed new homes will simply make a bad situation even worse.
Cally Bartatt		Yes	This plan was already declined by the Inspectorate for multiple reasons, these reasons are still valid today and nothing has changed to think differently.
Lucy Johnson		Yes	Rainham can't deal with any more houses the roads are too busy doctors are to busy everything is to busy, people are stupid thinking this is a good idea it's only going to negatively impact Rainham
Joanna Taylor		Yes	We respect and love our green areas, the local services could not possibly cope with a large number of new homes. Services, especially NHS are struggling already. We cannot get into GP is our choice and no chance of NHS dentist. We cannot cope now. The area would collapse with an even larger population. Where would kids go to sch
Lorraine Griffin		Yes	Infrastructure wholly inadequate for current population as is. Roads/ hospitals/ doctors/ schools/ gas and sewerage to name a few. Any road closure causes immense pressure on A2 and Lower Rainham Road. At certain times of the day, it can take ages for me to leave the house, and I am wholly dependent on another driver, stopping to
Linda Beckett		Yes	The Government mission of housing should definitely come and live in Medway before allowing anymore building in this area. Our hospital has struggled to cope for several years as it is but nothing is ever offered to help it, the lack of dentists doctors and water are huge issues as we are now. We already have the threat of being penalised
Paul Biddle		Yes	
Laura Sutton		Yes	I do not live in this area but I do have to drive along the Lower Rainham road to get to work and this is horrendous in the morning at the moment, my 15 minute journey can take an hour and with 750 new houses and the other developments going ahead this area could become gridlocked.
Andrew Freiter		Yes	
Tracey Pullen		Yes	
Kerry Harris		Yes	
Maureen Lawison		Yes	Losing wildlife and Greenfields chaos on roads and hospitals, schools and doctors
David Weeks		Yes	Enough is enough. Rainham and the surrounding area are already at breaking point.
			The sewage works at Motney Hill are regularly overwhelmed with barely any upgrades for decades. It's not fit for purpose now, let alone with more homes added.
			Doctors' surgeries? Overman. Medway Hospital? Struggling. Roads? Clogged.
Lewis Hickman		Yes	And while we're at it, let's not forget the destruction of natural habitats, green spaces, and trees... all in the name of so-called "progress." Funny how Labour loves shouting about Net Zero while ripping up trees and bulldozing wildlife habitats to cram in more housing. No more development until the infrastructure is upgraded and nature is protected. Locals deserve better. Nature deserves better. Enough of the hypocrisy.
Alex Lilley		Yes	
Stephen Friday		Yes	Insufficient infrastructures to support the additional population (road network, healthcare etc...) We're in real danger of becoming an overflow for London, which is exactly what most locals are trying to avoid or escape. More Development in this area will destroy the heritage of Rainham, and likely force happy residents out of the area to es
Billy Fleet		Yes	The additional road traffic this development would obviously add to will place the existing road network under immense pressure and will not be able to cope. This development was rejected in the past with very good reasons.
Lauren Colton		Yes	
Rhys Hughes		Yes	I've lived in this area all my life. I grew up on Broadway and spent most of my youth at my grandparents on Thornham Road and remember walking through the lanes with him. Given the beauty of the area and its obvious advantages to wildlife and green space which is a major factor in modern society with multiple green initiatives and net
Eric Reynolds		Yes	We cannot afford to lose the food independence that good farming land provides for the country.
Brenda Reynolds		Yes	Overcrowding and lack of facilities.
Joy Sanders		Yes	Recent heavy rainfall in the area has shown that local pumping stations are already overwhelmed. Huge tanker lorries had to be used to clear the overflows on the lower road which is already extremely busy. If this project goes ahead the main road in and out will not have the capacity it will need - the road is already often congested. The
Rhannon Fossey		Yes	Whoever is building this houses needs to be locked up and the key thrown away. Medway used to be a beautiful city and now it's just turning into a modern version of London. Busy. Overcrowded. Overpopulated because you keep building all these new builds I. Granted yes I live in a new build but if I have know all these others would have
Hannah King		Yes	The traffic is already terrible in the area and in the mornings backed up by traffic from Leigh Academy on Otterham Quay Lane which means I use Lower Rainham road to get to motorway, the road is already so busy without these additional houses and there are so many developments not yet finished along there. Lower Rainham road was
Jack Gregory		Yes	Traffic is already a nightmare in Rainham, with no plans on how the infrastructure will be upgraded to deal with the housing then this problem will only increase making Rainham a less desirable place to live
Russell Saunders		Yes	
N Scott		Yes	The local infrastructure and services simply cannot cope with this level of building- we already struggle with the volume of cars, with no real capacity to improve the surrounding road system, in addition to the loss of a valuable green lung
Julie Jobson		Yes	The building of more houses will absolutely damage the wildlife and surrounding areas - the road cannot withstand the volume of traffic as it is without further development. The local infrastructure is also unable to support this development.
Daren Pasfield		Yes	
Anna-Marie Matthews		Yes	
Jayne Dunn		Yes	Please can you stop London Councils building on Medway land. Whatever new houses are built should advertised for Medway residents only in the first instance and only afterwards advertised nationally. There needs to be far fewer houses built and they should be built in already urban areas such as central Gillingham and Chatham. These houses will be near public transport and there will be less pressure on already overcrowded roads. We need proper green spaces, not pathetic strips of green, which is all that will be left if this carries on.
Nikki Morris		Yes	We need to save our green land and orchards - we need the trees to live I There is far too much pressure on the local roads- most of the time the traffic doesn't move along the A2 in both directions. Trying to get out of the top of pump lane is near on impossible, there isn't the infrastructure for another 750 homes- there have already been too many new homes build in the area adding to the pressures of the roads. If a new school is built it will just increase the traffic on the roads- school time is already a nightmare with so many schools in such close proximity - using the a2- lower rainham road and pump lane - it's no joke I

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Frances Anastopoulos	Yes	Rainham has already become a really congested area for traffic and lorry movements, a massive construction of this nature will only intensify this problem. Obviously, all previous reasons against this planned destruction of a natural beauty spot of Rainham are still relevant, along with all the previously stated problems regarding hospitals,
Adam Morris	Yes	1) Problems with loc traffic. This is already very busy on the Lower Rainham Road. 2) Addition load on utilities especially waste water as Southern Water are already struggling with incoming flows at Motney Hill.
Mel Hadlow	Yes	Traffic!
Rick Wilmot	Yes	
Patricia Curtis	Yes	
Shiralee Keane	Yes	
Kerry Wooloughan	Yes	This development is not suitable for the area
Georgia Olley	Yes	
Lis	Yes	How much more can medway take, we can't go anywhere now without traffic. Jams plus lack of schools, amenities, water, jobs to name just a few. All the council think about is more income from council tax. I'm taking pictures of the country side in medway to show my grand children what the countryside was before it becomes extinct.
Kaye Retteley	Yes	
Andrus	No	
Paul Fisher	Yes	
Declan Wooloughan	Yes	Completely inappropriate for the area
Sue McAllister	Yes	No thought has gone into these developments on the impact of the loose green belt land! Brown field sites MUST be sort and use first! This will affect agricultural and nature which we need to maintain.
James Felton	Yes	
Stuart Lewis	Yes	
Brian Backhouse	Yes	Build on brownfield sites not green
Stephen Webb	Yes	
Eileen Yarnon	Yes	The current infrastructure cannot support the community of Medway as it stands, there is no way that this build should go ahead.
Linda Northover	Yes	Not enough Gp surgery's dentist's or and hospital overstretched. I live near the Strand and the lower road going will not take the extra traffic.
Daniel Parsons	Yes	
Sonny Andrews	Yes	The plans dont seem viable and the infrastructure
Paul Miller	Yes	We don't have the infrastructure, roads, doctors, dentists etc for more housing. Rainham and Gillingham too congested already.
Jodie Rushworth	Yes	The infrastructure in the area cannot cope with current demand and it will ruin the local green space
John Maher	Yes	We are a small town the roads can not cope the hospitals & dentist can not cope
Charles Dunn	Yes	The application was rejected in 2021...all the reasons for rejecting it then are still valid now. The traffic on the A2 and on the Lower Rainham Road is very heavy now, thanks in part to all the house building that has gone on in Rainham over the last few years (e.g. on Otterham Quay Lane which runs between the A2 and Lower Rainham Road). Adding even more traffic is a very bad idea! I live on the A2 and work from home 3 days a week. The proposed site isn't within easy walking distance on a town centre or a train station, or even a major bus route...the occupants would pretty much have no choice but to drive. It's noticeable that most houses have at least 2 cars...so that's a lot of cars added to the existing traffic on the local roads. And destroying that many trees to build the houses? My understanding is the land down around the Lower Rainham Road already has a heightened risk of flooding. (It's downhill from Rainham and it's near the river). Take away the orchards which must act as a water sink and replace them with houses, it must increase the risk of flooding, and wouldn't the new houses have a high risk of flood? Our house looks over the apple field, this will cause such devastation to the wildlife visitors we see to the Apple fields. There will be years of noise, traffic pollution. Medway Maritime Hospital is already at its limits and this is going to add so much more pressure to medical services. The roads in this area are not built for this much traffic. T
Joanna Featherstone	Yes	Rainham is at full capacity already with the amount of new houses already built or already under construction. Our roads are mainly narrow lanes and cannot take any further volume of traffic. Any slight problem with the M2 or Lower Rainham Road and Rainham grinds to a halt with a 10 minute journey taking up to 45 minutes On average
Jacqueline Potter	Yes	Losing trees and green spaces
Anne Edwards	Yes	Too many new houses. Not enough health provision. Not enough school places. Roads inadequate.
Mark Oliver	Yes	
Emma Moones	Yes	Lower Rainham is becoming a real bottleneck, especially when roads close which happens frequently. We are slowly but surely losing our green spaces and countryside and wildlife habitat. There are insufficient schools and GPs, poor road systems that were not designed for this volume of traffic, sewage systems that cannot cope. The house
Lisa Humphries	Yes	There is not the infrastructure in Rainham (particularly the already clogged road network and water / sewage capacity) to meet the needs of this significant further development. It will also have significant impact on nature and as a country we should be maintaining our land which is a source of food should we need to be self sufficient to
Lloyd South	Yes	
Tess Dixon	Yes	
Jane Higgins	Yes	There should be no further development in Rainham & Gillingham until ALL of the infrastructure concerns are addressed. The roads are congested already. The lower road, is a busy thoroughfare already and the road is inadequate. Schools, hospitals and GP surgeries are overwhelmed. Is there an adequate water supply?
Shannon King	Yes	Enough is enough.
Gavin Shrubshall	Yes	The need for housing does not outweigh the consideration for already established communities, empty and unused housing stock already in situ and the impact on already congested and under serviced road infrastructure in and around rainham. Proposal of 'additional services' should also be mandated to be sourced, constructed and ser
Valerie McQuaid	Yes	The overdevelopment of the rainham area will not sustain and is already struggling under the increased traffic strain from the current developments and the encroaching swale developments.
Claire Tulloch	Yes	This vast development would severely impact Rainham, roads gridlocked, much reduced quality of life due to overcrowding, loss of agricultural land which can never be recovered, loss of precious open land which would have a huge impact on residents' wellbeing.
Lee Tulloch	Yes	Our roads, our hospitals, our schools etc are falling as it is!
Michelle Cockerton	Yes	We need our green spaces
Andrew Piper	Yes	I'm totally against this development due to traffic to many cars on the roads which won't be improved at all. Lack of doctors dentist and schools. also the countryside it's just all going away no greenery just more pollution to the area
Peter Cook	Yes	Use common sense there is to much traffic in the area already hospitals can't cope and not enough facilities to cover thousands more people.
Joanne Muspratt	Yes	
Lauren Waters	Yes	
Lis	Yes	
Zoe Jackson	Yes	
Mark Lacey	Yes	More destruction of biodiversity and no infrastructure improvements to roads that are already failing to cope
Timothy Higgins	Yes	Grade A agricultural land. No transport links. No infrastructure. Not in local plan. Already turned down on appeal. Not a difficult decision.
Debbie Beeching	Yes	
Marie Edwards	Yes	
Jackie Bassant	Yes	
Dionne Groved	Yes	Our road infrastructure is already at capacity...constant gridlock and closures. This will be detrimental to our environment and quality of life. The local wildlife and beautiful countryside will be further affected and diminished. This housing will most likely not even be affordable for local residents and will be filled with down from Londoners.
Steve White	Yes	
Anne-marie	Yes	Our roads are chaos already, we do not need more heavy goods vehicles on them, damaging them, nor do we want 750+ more cars on them. There's no infrastructure to support new homes. We are over run already
Marie Oztendir	Yes	The area is overdeveloped, there is very little green space left in Medway, traffic will increase on already overused roads and infrastructure, loss of amenity for local residents, increased pressure on already stretched public services such as Medway Hospital
Joanne Seaward	Yes	The existing infrastructure, particularly the Lower Rainham Road with its two sets of traffic lights will not be able to cope with the additional traffic both during the build and subsequently with the traffic generated by the new residents
Kerry Matthews	Yes	
Leigh Matthews	Yes	Traffic, pollution, noise, trees, badgers are protected, other wildlife, crime, doctors
Diane Matthews	Yes	The orchards are habitat for a variety of wildlife. Infrastructure is non-existent in Rainham already. Traffic congestion is all ready there on lower Rainham Road and the A2. Pipes underground will crack under pressure of more traffic causing more problems. The noise of construction.
Karisha Rehsi	Yes	
Mandy Nain	Yes	
Kelly Andrews	Yes	
Amanda Barnes	Yes	Leave us some countryside. Too many new developments in such a small space
Ian Barnes	Yes	
Charlotte	Yes	ST06's need to be adequate to ensure the local area can cope with any more housing. These need to be implemented before any house building can start. These need roads cannot cope with the amount of traffic coming through Lower Rainham Road and the surrounding off roads. Neither can the water system, given the issues with water
Gaynor	Yes	Ridiculous to create more housing, rainham is drowning already in too many cars, on the road not enough doctors, dentists, schools, to cope with this overload. Plus we also do not need more dysfunctional families brought down from London to turn rainham into a unsavoury place to live, we can already see it happening with people that
Ching	Yes	You will destroy the whole town and take away anything that is nice in the area. The roads can't cope as it is. The internet can't cope and affects business It is over run with people and becoming extremely untidy and not looked after. The water and the electrics are already over stretched.
Allan Rest	Yes	It's just a money making exercise that won't be forlaid and will just make more room for non working residents and bring in more immigrants into this area.
Liz Allan	Yes	Totally inappropriate site with a lack of infrastructure. This is prime agricultural land and is a habitat for much wildlife. Heritage properties are within the locality and would be impacted. The A2 and Lower Rainham Road are gridlocked at peak times and the impact of ongoing new builds in Lower Rainham Road have not yet been realised. L
Manjit Sohal	Yes	
Graham Masters	Yes	This development will be devastating to the local area. It will cause great pollution not only during the building process but also after the houses are occupied. We already struggle with traffic congestion on both the A2 and the Lower Road especially when there are roads works, which are common. A simple journey can sometimes take be
Bob	Yes	
David Smith	Yes	

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Debbie Rams	Yes	The loss of valued green land, protecting wildlife the increase in traffic on roads that are not designed to carry huge amounts of car, coaches and construction emission is again not compatible in this area Another 2 schools in what is an already over populated development, again will encourage more traffic which the A2, Beachings Way and lower Rainham road can not cope with GP surgery s and hospital Medway Foundation Trust is already at crisis point with no room for expansion due to protected area GPs are not able to fill posts in existing surgeries let alone the intended proposal
Catherine Grant	Yes	Local infrastructure would not be able to cope. Roads are already crowded. Water supply, Medical services already under strain. The planners' idealised view of this development, with flowers and greenery and deserted roads is unrealistic. This development would be a huge burden on our services and would take away a glorious green spot
Paul Amott	Yes	
N Browne	Yes	
John Grant	Yes	The proposed development on land that currently serves as a 'green lung' between Gillingham and Rainham will be harmful. The current orchards currently enhance the living environment for the current neighbouring communities by ensuring valuable green space and improving air quality
Elle Summers	Yes	Development of further housing and a school will add greatly to traffic flow on roads which are unsuitable, Lower Rainham Road is the only practical route connecting Rainham and Gillingham for the proposed development and it is not two way for its full length with sections of single width road that cannot be widened. Key junctions (Bentley Road and Rainham Road) are already at capacity
C Morgan	Yes	Plenty of brown space, why ruin these beautiful orchards
Janice McCaukey	Yes	
Stephen Steadman	Yes	Please leave our orchard alone!! We've so many developments! This area already without this one as well
Jean Hall	Yes	The roads are far too busy same as hospitals, schools and Drs, the crime rate is rising and we don't have enough police officers, it's not safe to walk the streets even in daylight
Donna Hart	Yes	Not enough infrastructure, hospitals already have long waiting lists. Disregard for wildlife. Pollution. Unable to deal with sewage now. Traffic is already really bad, congestion will get worse.
Paramjit Beebejaun	Yes	My family have lived in lower rainham for 100 + years. Orchards of fruit, hop fields and our back garden lead on to beautiful fields with lots of wildlife. There is several new builds going on in lower rainham at the moment and it's getting so over built not the rural place we love. traffic is already a nightmare. No school places doctors or dentists
Kelly Johnson	Yes	The infrastructure in roads and local hospital are insufficient to cope with additional homes and associated traffic and patients
Kevin Whittaker	Yes	I have used Lower Rainham Road for 28 years and over the past few years the traffic along the road is ridiculous Also had my water supply increase my monthly payments by over £20 per month, their reasons for doing so being that as there are more and more houses being built there is an increase in demand for water. Our Dr surgeries are struggling due to increased population as are hospitals, and dentists, making getting an appointment much more difficult Our roads can't cope with the extra traffic and are full of potholes already that aren't getting fixed
Tuesday Finch	Yes	The lower Rainham road has a 7.5 tonne weight limit along it. All this construction is destroying the road and it is not wide enough for all the Hgv vehicles that use it. There are far too many Hgv vehicles already using it. The constant building of houses in this area is not good. There have been hundreds of houses built in last couple of years and the excess traffic causes the lower Rainham road to be congested. The lower road is always being closed for repairs and this brings Rainham to a virtual gridlock. Also all these new houses in this area all have to use Medway hospital which can not cope with the amount of people already here. Until a new bigger hospital is built then no more houses should be built in this area. There should definitely not be people from London being moved down to this area by London councils. Any houses that have been built in this area should be demolished and the area should be returned to its original state.
Andrew Lismore	Yes	Just think we are losing our farming and land. It shouldn't be happening. We will have no fields left - we are Kant - not Newquay City
Helen Hall	Yes	
Alice Oliver	Yes	
Ross Green	Yes	The local natural landscape is being replaced with a concrete landscape which not only removes nature corridors in an already over populated area, but also depends on a road infrastructure that already can't cope with the additional traffic generated from the lower Rainham developments.
Shirley John	Yes	Please stop destroying our green spaces. We need to breathe some fresh air. We are already struggling with the local roads, hospital, doctors, water
Gary Barnett	Yes	My granddaughter (4) needed a hospital appointment after a blood test showed she was deficient of iron. The first available appointment was in December. In 2023 this is a disgrace. Medway Maritime Hospital cannot cope with the number of residents in the Medway Towns. We can not cope with more families.
Natalie Janett	Yes	Do not build these homes on the lungs of Rainham. 20,000 trees gone? criminal!
Christopher Barber	Yes	
Robert Marfield	Yes	This land is too important to lose to housing. It is grade one agricultural land and must not be built on
Chloe Julian	Yes	There has been significant large scale redevelopment in this area with limited access in terms of road network. The lower road cannot cope now - with the addition of what is laid out in the local plan - the area will be under immense pressure. As well as detracting from our quality and the environment - this decision is excessive and will be detrimental to the area.
Shuart Atkinson	Yes	
Jackie Taylor	Yes	
Stephen Pattenden	Yes	Our local community is crumbling already, local amenities are stretched, healthcare is in its knees, traffic is appalling. We cannot cope with anymore housing before any of this is fixed, not patched, fixed permanently.
Alan Grossmorth	Yes	We do not need or want more houses in lower Rainham. The additional houses built over the last few years in lower Rainham is already having a detrimental impact on the volume of traffic and in many occasions I have seen it queuing back over 200 yards from the Yokosuka Way roundabout which adds to poor air quality on Lower Rainham Road
Taran Singh Padam	Yes	This developed will destroy heritage hop farm and orchards where generations and traditions used to come together, not only that, the developed will put more pressure on local infrastructure such as roads causing more pollution and more damage to the local environment and rail as they will be commuting to London, as well as more pressure on the local infrastructure.
Margaret Robertson	Yes	It is agricultural land in an already highly developed area. The increase in traffic and pollution will be detrimental to the health and well being of everyone.
Susan Tasker	Yes	I walk my dog in that area and it's a beautiful place
Doug Barnfield	Yes	Nothing has changed since the first refusal I read my case
Rebecca Miller	Yes	
Natalie Woods	Yes	This planned build is going to completely destroy my area where I have grown up. The area cannot cope as it is with the amount of houses already being built. The roads and infrastructure were not designed for huge towns, just small villages as it once was. Where are people going to get healthcare? GPs and dentists are already over stretched and as for the hospital, Medway just will not be able to cope. Then there's the fact that the area is already over populated and the roads are already congested. There is an awful lot of wildlife also in these areas, where are these animals, birds and insects going to relocate to? Not in the new builds postage stamp size gardens with artificial back lawns and black paved front areas. This leads me on to the air quality where we are, it can't be good with the amount of traffic (usually idling at a standstill, because there's already too much traffic) So it's going to be even worse. Please don't approve the application
Dave Hamblton	Yes	
Gary Ford	Yes	I have lived in a loved Rainham for over 30 years, & no aspect of the proposed development benefits myself or other existing residents in any way, it only serves to permit an easy application for Medway Council to fulfil the local plan which should not be including this region of Rainham in the first place.
Katherine Whitehead	Yes	The road infrastructure just will not cope with this proposal. It is already stretched to past its limit now!
Alison Martin	Yes	The lower Rainham Road area is congested as it is with traffic, buildings more houses without the infrastructure in place will cause major problems. As for the orchards, we need to save the trees from an environmental point of view as they are irreplaceable and their ecosystem will be destroyed. Therefore adding to the decline in wildlife and increasing globe warming which is already having an effect on in us and nature. You may say it's only a small area but all these areas add up and eventually we will be left with nothing.
Anthony Crowcroft	Yes	We have lost too much of our agricultural land to housing developments and this needs to stop.
Sandra Peake	Yes	We do not need any more houses within the Rainham area as there are not enough schools, Doctors and Dentists. Apart from the infrastructure is never thought through enough for any planned housing. Green spaces, orchards and woods are needed especially in this day and age.
Shirley Ryan	Yes	
Chris Crick	Yes	Local people like me (born and lived in Gillingham all my life) are being denied a decent medical service- having to wait far too long for appointments at doctors and hospital which is far too small for the area. All due to the increase in population. Increase in traffic on roads which are not suitable for existing traffic. The list could go on. Please don't approve the application
Maria Harrington	Yes	It's absolutely heartbreaking what is happening to our countryside. We've already lost so many orchards around this area. Our health is suffering. Our wildlife is suffering. Why are you building on greenbelt land when there is so much brown belt areas that are not being built on?
John Boyd	Yes	
Anna Zablocka	Yes	
Nicola Floney	Yes	Roads sewage Hospital Doctors Dentist Wildlife Pollution fresh Water and the list goes on.
P Clarke	Yes	
Maggie Mills	Yes	Along with the impact of all the above mentioned facilities in the locality ie, landscape, traffic utility services etc, the impact on Medway Maritime Hospital will be catastrophic, with all of the other housing developments appearing throughout Medway and Swale.
Katrina Hales	Yes	We need these trees to be able to live. Stop building and over populating Rainham
T Pay	Yes	Siting of the development is inappropriate for the surrounding area valuable countryside and orchards and agricultural
Ian Griffin	Yes	Grade one agricultural land is essential for both our food security and to reduce carbon omission due to the importing of food. It should be used as such.
Mr and Mrs Knight	Yes	There are too many houses here, too many cars and infrastructure cannot cope with traffic, schooling and doctors etc!!
Roger Fu	Yes	
Daniel Dobinson	Yes	
J Heaney	Yes	
R Heaney	Yes	
Cathy Assoba	Yes	
Graeme Johnson	Yes	Not enough capacity at Medway hospital, GP surgeries, dentists. The surrounding roads are unable to cope with traffic as most properties have more than one car. Also the water companies don't have capacity for the house already here so how do they intend to supply more homes in this area. The Lower Rainham road is also heavily impacted by the increase in traffic.
Angela Wallace	Yes	Once green spaces are lost, they are lost forever. We are putting short term 'priorities' of money and greed or a few disguised in the name of 'helping the housing crisis' and in a nutshell putting the nails in the coffin of sustainable living. We will have no local produce, no pollinators and in the long term - no natural world. I'm disgusted by it
Richard Tric	Yes	This is Kent England's garden not concert
Harbhajan Thind	Yes	
Paul Skinner	Yes	Insufficient access area over populated destruction of greenbelts
Amie Richardson	Yes	This building planning is going to destroy wildlife habitats and also the current infrastructure will not take the weight of a whole new community. We need hospitals schools and doctors surgeries, not more homes
Jessica Baker-Clark	Yes	Medway is already sinking under the weight of development. Don't make it a slum.
Amanda Hornsby	Yes	There have been thousands of new houses built in the vicinity of my home on the edge of the lower Rainham Road and Otterham Quay Lane, both access roads for this site. The multiple developments that surround me have been built in the last 5 years and in the planning wilderness of the boundaries between authorities (Medway and Swale) As far as I am aware this was the only free space left in the area, other than that now subject to this planning application and it disappeared over night. I have lived all over the country and I have never lived in an urban area so poor in green and open spaces as Rainham. The east lower rainham area was an area of open spaces, public footpaths and green fields - every available space is now covered in housing - with no additional roads, green spaces, schools, Health or commercial facilities. There is congestion and grid lock throughout the area already and if this application goes ahead this will increase, there is a dramatic lack of medical facilities - this area is one of the poorest served areas for GPs in the country, this plan will increase pressure on services that are already over stretched. Past covid research indicated that a 10% increase in population would result in a 50% increase in demand for health services. Beyond this, the people of Rainham spoke before on these proposals - their voice was strong and rightly the proposal was denied. Accepting this proposal now will do nothing to improve trust or support the local community - we have told you we reject this submission once and we now tell you again now this proposal is bad for the environment and the health of the area. The huge development will destroy the sea bed of the area and the area will be left with no wildlife in the area. Rainham and close surrounding area does not need or be able to cope with anymore houses being built in the area that's not to mention the strain on the road network and the lower rainham road is already being used as a main road even though it is a small B road which has a 7.5ton weight limit which is mostly ignored and when it is closed it causes a huge congestion of 4 or 5 miles and over 1,000 people reading doctor dentists and not to mention a hospital that can cope with more people which Medway Hospital CANNOT all these things should be considered seriously Kent used to be called the garden of England it is more like the garden of concrete which has to STOP I object to this planning as we have so many new build plots along the lower Rainham road. Traffic is horrendous at rush hour and if there has been any accidents in the area. My elderly parents cannot get off their drive and have had their car hit severely times. Wildlife is becoming existent. This plot is in-between two lovely lanes that carry a lot of traffic.
Nikki Atkinson	Yes	Bees, wildlife, trees, wild flowers etc
Linda Darby	Yes	
Elizabeth Travel	Yes	The traffic in Rainham is terrible and the roads are not adequate for the extra traffic 750 houses will bring. It is ridiculous to assume that this will have a positive impact on the community.
Stuart Lowther	Yes	This is political opportunism. Nothing has change sufficiently to change the inspectors decision in 2021

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Shelley Johnston	Yes	
Rob McMorran	Yes	
Lisa Libertucci	Yes	Along with all other residents in this area , we strongly object to these plans . We have lived in our house, Grenadier Close for 5 years and in that time alone have seen over 1,000 homes going up within a 1/4 of a mile of our house. . all using Lower Rainham Road & Otterham Quay lane & surrounding local roads for access. My family & we appreciate the need for new homes but none of these local homes are affordable for my children in their 20s / 10 local incomes. They don't want shared ownership and are not able to get social housing . they want a house they can afford. . Yeah, I'm just finishing this but this is not happening . We moved here as it seemed a semi rural area and now we are being built all around us. It's affecting our general health & well being. We moved to be close to nature and it's being destroyed. 200 homes being built directly behind my house now . we've lost many of our birds, rabbits & foxes, cuckoos, wood peckers & bats are struggling .
Jan Bunting	Yes	
Y Smith	Yes	The infrastructure of the surrounding area cannot cope at the moment, adding extra stress on it will be a disaster!
Phil Sayers	Yes	The local road system cannot handle the extra traffic these homes will produce. It's already too busy!! If they invest in the infrastructure then happy for the homes to be built. Obviously this won't happen.
Nicola Knott	Yes	The local community can not take any more traffic. The infrastructure is not there, schools, hospitals, dentists are not available for the community already and more houses will add to the already overwhelmed demand.
Anita Pease	Yes	Loosing more local countryside will be detrimental to the community and impact on the environment for animals and humans. There is already too much building within a few miles radius and more houses are not needed.
Jane Carter	Yes	The orchard has been there since way before I was born, I remember my late mum telling me about the orchard and it would be devastating if the orchard was destroyed.
Sophia Pease	Yes	Over crowded already. Not enough structural services to support any more houses
Valerie Prodronou	Yes	It would be a shame to lose a green space and lose a area that my nan talks about and so does my mum.
Ralph Belmonte	Yes	The proposal would impact too much on the current bad traffic situation and on the sheer volume of people using Medway Maritime Hospital and NHS services.
Yvonne Belmonte	Yes	
Dean Midgeley	Yes	
Paula Hills	Yes	We DONT need more housing in the Rainham/Urchurch areas. It's bad enough that the Pear Tree Orchards have been sold for housing, which will be started shortly. I am fed up with the waste of fruit, which happened last year and now this! Our country has a high poverty situation and the fruit could have been given to charities and food banks.
Carol Adams	Yes	
Brian Allowood	Yes	This area cannot sustain any more traffic. Kent is full of areas that need regeneration
Aggy Prodrmosu	Yes	Not here in Rainham
Lukasz Kosakowski	Yes	Far too much traffic, Hospital overcrowded, the infrastructure can't come as it is, so more houses means more people and vehicles.
Andy Wrafford	Yes	Impact on local hospital will be huge and waiting time will be even longer on A&E and wards.
Zoe Fincham	Yes	Having walked through there many times, I would hate development here!
Justin Harris	Yes	Stop building on green land. There's so much housing being built with roads infrastructure. The area and the Medway Towns can't cope as it is. If this is allowed to go ahead then the greater effect on agriculture and agricultural production in Kent, specifically Medway will contribute and detrimentally affect the whole country
Sonia Harris	Yes	More traffic on local roads what can't already cope. Local services. Schools doctors etc...
Maree Colgan	Yes	Infrastructure won't be able to cope
R. Lusted	Yes	
Rebecca Chipchase	Yes	This is the only green space between Rainham and Gillingham and must be maintained.
Carole	Yes	
Rachael Whitlock	Yes	
Paul Bennett	Yes	Common sense must prevail. This has been rejected multiple times. Do we have to keep listing the reasons why? Rainham and Gillingham is on its arse. they are massive wait times at Medway hospital. The traffic is diabolical there are so many reasons why this is a stupid application. There are no doctors. Dentist. The SEN needs is this
Emmalee Goda	Yes	
Brian Summers	Yes	We are in danger of losing all of the rural aspect of this area. Any further development will have a huge detrimental effect on the current residential population, flora and fauna. Local essential services are stretched as it is along with the volume of traffic this will incur - how can this development even be considered for approval ? There has
Mazie Payne	Yes	
Aidan Homslby	Yes	I grew up with my friends walking through the orchards, making our way to riverside country park and then to the strand. That whole route would be completely impossible now without using a main road which is extremely dangerous for children (no matter how big they think they are). Following this, there is no room for the traffic, at all. No
Glynn Homslby	Yes	There has been excessive building in my area and I feel the roads cannot cope with all the excessive traffic more house building will bring .
Berthany Head	Yes	
Sophie Graystone	Yes	
Sam Norman	Yes	
Wayne Lawrence	Yes	
Justine Foord	Yes	
Marion Torralba	Yes	Local fruit trees help the environment and the community
Mark Norton	Yes	
Elaine	Yes	Amongst a lot of concerns with these plans the infrastructure, around this area, really concerns me. The roads are already struggling with the houses being built at the other end of the Lower Rainham road the increase has just overloaded this area. With Grade 2 listed properties and protected land it is impossible in parts to make roads big
Clare Boorman	Yes	
Alex Crowe	Yes	Loss of wildlife and greenland is immeasurable and unnecessary. This will also cause more traffic on an already existing busy road.
Ainsley Dixon	Yes	We cant have anymore houses built in the area, not only don't we have the infrastructure but you are taking much needed green belt. I've lived here 10 years now and have already seen a decline in wildlife and sure that's due to the extra houses being built on farms and green land.
Sue Martin	Yes	This land is desperately needed as a breathing space for the locality. There is no sufficient infrastructure for the traffic this development would generate. Not enough doctors dentists and schools for the additional people not to mention the impact on the local hospitals. The roads around this area are already extremely busy and end
Paul Munson	Yes	
Adam Butler	Yes	
Paul Griffiths	Yes	Little has changed since the inspector deemed this an unsuitable site. Traffic will still have a hugely adverse impact on the area (and little can be done to improve the roads), the land is still highly viable farming land, and the visual and ecological impact remains . The str was bot suitable previously and it still isnt
Clare Connolly	Yes	Little has changed since the inspector deemed this an unsuitable site. Traffic will still have a hugely adverse impact on the area (and little can be done to improve the roads), the land is still highly viable farming land, and the visual and ecological impact remains . The str was bot suitable previously and it still isnt
Michael Feakings	Yes	The rape of our landscape is irreversible. Please do not do this!
Gillian Butters	Yes	Too many houses, not enough infrastructure. Hospital not big enough. Not enough doctors etc:
Joanne Yall	Yes	This cannot happen once gone it's gone
Patricia Vinten	Yes	
Jackie Cheeseman	Yes	
Keith Dudley	Yes	Not enough green space and infrastructure
Jeanette Burroughs	Yes	Iestad2412
David Pease	No	Traffic, Loss of farming land. Would prefer brown field sites are used in preference to farm land. Councils maintain a register of these sites so they are easy to locate.
David Hannah	Yes	that orchard has been there since my nans day and they can use the money for somethings else than construction on new houses like for example most of the road in medway need to be re-paved because there are pothole still there since last snow fall
Sheena Green	Yes	Unbelievable destruction of country park area. Virtually no suitable road access. The orchards are the gateway to Rainham arriving on train. The proposal will obliterate this and make Rainham another link in the Medway dystopia. Further to earlier comments - I wonder how many of the 1,000 children in temporary accommodation will be h
Brenda Campbell	Yes	This will increase the amount of traffic on the Lower Rainham Road causing more traffic jams as it is just not wide enough, and causing even more pollution in the area. We do not have enough G P surgeries, hospitals, schools both junior and secondary causing even larger pupil numbers in classes which will cause a detrimental effect on
Peter Cockroft	Yes	
Vittorio D'Onsi	Yes	Please consider that the surrounding roads will become overloaded and dangerous. My particular concern is that there is no footpath through Pump Lane which is a regular route taken by school children. Take a visit on a school run morning and see how the whole roadway system grinds to a halt. Then explain what you're going to do to s
John White	Yes	Lower Rainham Road traffic and condition is already bad before all these developments, now the road is under construction so often due to the weight of traffic. WHERE ARE THE NEW HOSPITALS AND DOCTORS
Mark Johnson	Yes	We need to keep some of our lovely orchards for our wildlife and the wellbeing of the community, there has been enough new building sites in the area. The infrastructure around the area is not made for all the extra traffic and disruption
Sarah Platt	Yes	This will harm the environment and all the ecosystems that exist within the site. It will run prime agricultural land therefore the area will rely on imported fruit etc. The traffic within the area will intensify therefore damaging the area and causing an already polluted area. This part of Gillingham/Rainham is already being overdeveloped with h
J Cook	Yes	It will be a complete tragedy to build on Pump Lane Orchards. Gradually, all of our green spaces will be gone!! The roads around the local vicinity are already abysmal, and the extra traffic would cause havoc. More houses, not just by the way taking place, but the extra cars in the area as well, which could have a huge impact on people here. The orchards are also home to the birds, bees, and other wildlife, which we need for our food security. I want my grandchildren to be able to enjoy the green spaces we have, as I did as a child. All Gostham is interested in is the money in his Bank Account, not for the future of our children, grandchildren, and so on. We are supposed to be g
Sally Scott	Yes	We are overcrowded as it is. Please DONT let this man destroy our beautiful Pump Lane Orchards! Think about our environment. You expect us general public to do our part in making the environment better. If you let this proposal go ahead you (Medway Council) will be making a huge mistake, which could be costly for Medway Council in
Julie Nind	Yes	Additionally where are all the new community services (doctors, hospitals etc) to support this build?
Suz Hill	Yes	JCook
Scott McLaren	Yes	A huge burden on the surrounding area, with the likes of roads, doctors schools hospital and we already have a great amount of building going on and our country side is disappearing. we as an area will not cope.
Harrison Mudge	Yes	
Christine Morris	Yes	If it does go ahead provisions like doctors dentist health centres, community hub, school all need to be added along with this.
Ronald Harrison	Yes	
Tracey Ridgwell	Yes	Our roads can barely cope as it is. The hospital is over run and the schools are struggling!
Russell Flood	Yes	We need to produce more food instead of relying on imported food so why are we building on prime agricultural land? Also the local infrastructure is not coping with the current population of Rainham, still developers only see profit what do they care, they don't live here.
Theresa Page	Yes	I strongly believe that this development will severely impact the services of our local schools and surgeries also having an effect on the water supplies that have already been restricted presently.
Lynda Flood	Yes	That amount of houses proposed in the application will overwhelm the already congested traffic in this area.
	Yes	This application was rejected before and those reasons have not changed.
	Yes	Existing infrastructure cannot support the volume of development planned. Surrounding roads, doctors, dentists would not be able to cope with the influx of cars and people. We have had recent developments built in the area that have fulfilled our housing commitments.
	Yes	Road infrastructure already overloaded and there are numerous building plots already under way nearby.
	Yes	A loss valuable diminishing countryside/wildlife habitat. Plus local roads and infrastructure inadequate for potential increase in population and traffic
	Yes	Medway Hospital is already incapable of adequately supporting the local community, so further strain on NHS services is unwelcome

Name	Do you reaffirm your objection to the destruction of Pump Lane Orchards? Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Linda Norris	Yes
Simon Marshall	Yes
Louise Martin	Yes
Lara Wood	Yes
Julie Powell	Yes
Sam Crummond	Yes
Caroline Pattenden	Yes
Lyn Woods	Yes
Ken Woods	Yes
Lianne Falkingham	Yes
Lynne Taylor	Yes
Helen Jennings	Yes
Amy Miller	Yes
Heather Soar	Yes
Trudi Goble	Yes
Caroline Brett	Yes
Zoe Falkingham	Yes
Lesley Johnson	Yes
Clare Sharp	Yes
Marilyn Dowdell	Yes
Kieran Weston	Yes
Kerry Gwather Clark	Yes
Richard Hartmann	Yes
Stephen Soar	Yes
Alan Willett	Yes
Kayleigh Tucker	Yes
Michael Butters	Yes
Erin Ling	Yes
Curtis Bennet	Yes
Taron Miller	Yes
Michelle Denham	Yes
Hilary Allen	Yes
Matthew Fisher	Yes
Carol Bishop	Yes
Roy Bishop	Yes
Chloe Kelly	Yes
Christine Hill	Yes
Douglas Francis	Yes
Belinda Woodhams	Yes
Michelle Sutton	Yes
Andrew James	Yes
Katrina Crowhurst	Yes
Traci Hannant	Yes
Samantha Busby Kirk	Yes
Victoria Alehurst	Yes
John Baker	Yes
Carol Eldridge	Yes
Angela Alexander	Yes
Steve Chesson	Yes
Kate Belmonte	Yes
Daniel Belmonte	Yes
Oscar Belmonte	Yes
Joshua Belmonte	Yes
Tony Soper	Yes
Hazel Thom	Yes
Timothy Milington	Yes

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Finlay Hughes	Yes	Roads continually gridlocked, no doctors, no dentists, hospital on its knees, schools full, green spaces being destroyed at an alarming rate - no more new build!
Eileen Hubbard	Yes	This is prime agricultural land. We need to be able to grow our own food. There is insufficient infrastructure for extra people and traffic. More people means extra utilities, gp surgery, hospital and schools required. loss of agricultural land, destruction of habitat for various animal/bird/invertebrate/insect species, more cars = more congestion, more pollution, lack of infrastructure Dr's, hospitals. the roads and infrastructure are currently at breaking point especially during school drop off and pick-up/work start and end times.
Dawn Crane	Yes	I moved to lower rainham to be nearer green spaces but unfortunately due to local housing development the Green spaces are being reduced and the pollution is increasing. as an aside regarding the vehicle impact on the area I have noticed that surveys of traffic take place at non busy times such as school holidays or weekends which does not give a true reflection on the impact of vehicles and pollution in the area. most households have at least 1 car and some have 2 or more. if the development of the orch
Christopher Waklet	Yes	it is also worth noting that the orchards have already been destroyed tge lower rainham Road on the swale/Rainham border obviously awaiting swale building approval.
Linda Dovey	Yes	There no facilities in place to support further building, in particular hospital and GP services. Roads are already clogged at certain times.
Stacey Ashenden	Yes	We have enough housing here and the infrahed fit to burst. Don't take any more if our beautiful farm lands
Chris Minter	Yes	I have lived in my house for over 25 years and the difference in traffic and noise is already some days unbearable. The area just can't take anymore traffic. Please see sense and reject the building proposal.
Lauren Norton	Yes	
Cheryl Minter	Yes	This part of Rainham has already become overcrowded with too many houses being built. Roads, facilities like schools and doctors are already difficult to accommodate locals. Please leave this area alone, Kent is the Garden of England and is being ruined, especially locally.
Kate Thompson	Yes	
Mark Boland	Yes	Lower Pump Lane is a country lane which is now a cut through and will become a race track. The additional 1600 students for eight form will course traffic jams at the Beeching Way/ Pump lane junction. The rail bridge is has no pedestrian way for students to walk from Beechings to the proposed school, and there is a height limit on this bridge. Traffic jams are already caused by the buses and parent cars from the Grammar Scho The lower road already has a pinch point at the Three Marines traffic lights. At times there are more than twenty vehicles lined up bought sides of the traffic light. This will increase if they put a medical centre on top of this point, with the proposed loop at the bottom of pump lane.
Loarne Taylor	Yes	
Michaela James	Yes	This is prime farmland and would be criminal to be lost from an area that was once rich in orchards and now very much depleted. A part of the local areas heritage, maintaining food for the future and maintaining diversity of habitats for wildlife in an area that is becoming more and more urban.
Nick McCann	Yes	
Alison McCusker	Yes	
Mark McCusker	Yes	
Linda Quire	Yes	I live in Langdale Close just off the top of Pump lane. I can't imagine what it will be like with all the extra traffic etc. It's going to be nightmare
Ruhan Beebeegun	Yes	
Jane Camfield	Yes	I object strongly to this proposal. which will destroy vital grade 1 agricultural land, which should be kept for our food production, especially now with the world being in such turbulence with wars, Tariff trade wars and economic uncertainty Having been previously refused, with Medway Council spending £250,000 to defend it, that should be the end of the matter. The reasons for the refusal still stand true four years later and indeed more so since the over development in this area has caused enormous problems for the failing infrastructure. Pollution and traffic levels are much The Lower Rainham Road is a rural single lane with 2 chicanes and suffers with too much traffic using it as the only other alternative is the hugely congested A2, also mainly single carriageway. There have been many developments build in this area that use this Lower Rainham Road. Bloomfields, Station Road, Four Gun Field and Otterha The infrastructure cannot cope with this new development, this road cannot be made into a dual carriageway, it is not suitable. Medway Council have said they lost £175 million to improve the infrastructure on the A20 particular, so that is why this development is planned for Pump Lane orchards. But it is completely obvious that the infrastructure in Rainham is also totally insufficient for this huge development. The destruction of 60,000 trees is totally wrong. Medway council's own site and leaflets and brochures tells us constantly how they support trees and how vital trees are to capture CO2, reduce flooding threats, keep localities cooler, reduce pollution and combat climate change. Also they always mention how vital trees and green spaces a So how can they conceive that this plan is anything apart from pure madness? And what about all the nature and species that will be destroyed for ever in this huge area. Another huge blow to bio-diversity. Another catastrophic concern is how will these trees be destroyed, surely not open air burning with enormous pollution risks for the bo On the communication issue, over 6,000 objected to this plan 4 years ago, all with emails and contact details on Medway Council's site. I was one of those objectors, but I have only just found out by accident that this plan has resurfaced, with only a few days to do an objection by 10th August! Medway Council should have contacted those Harmful to landscape character, in conflict with air quality policies and inconsistent with sustainable development principles. Also open air burning of 60,000 apple trees releasing dangerous pollutants. Traffic is already a nightmare, hospital already struggles with amount of local patients
Lucy Perez Nino	Yes	
Steve Walche	Yes	
Jill Ford	Yes	No more using green spaces
Tina Gill	Yes	The proposed development will remove more agricultural land from the area which will in turn cause detrimental damage to other areas of the environment! Trees are important to assist in protecting from climate change! It will also impose negatively on the traffic and on pollution within the area
Carole Day	Yes	Stop building on our precious countryside. Roads in this area won't be able to cope with what is planned. Infrastructure non-existent
Lynne Parkinson	Yes	
Sarah	Yes	Destruction of vital habitat to wildlife. Destruction of farmland Infrastructure doesn't support more homes. The roads can't cope with any more traffic.
Wayne Adams	Yes	
Colin Taylor	Yes	Grade 1 Land should be preserved and treasured not used as another space to build unwanted houses in a beautiful area that is already struggling with school, doctors, hospitals and dentists. The infrastructure we t cope. Health services can't cope now it will be impossible with more residents, not fair to local people
Wendy Millington	Yes	The area already has too many new builds. It will mean more people using Medway Hospital which already struggles as understaffed and no longer fit for purpose. Schools in the area are oversubscribed. People already living here struggle to get a Doctors appointment or find a dentist. Greenspace is becoming less and less, wildlife is aff
Graham Harley	Yes	Leave the countryside alone. Stop concreting over all of Rainham
Rebecca Stone	Yes	It is inconsistent with sustainable development principles. The land is first class agricultural land which is huge importance to our food security. Our roads also cannot cope with more vehicles or GP/hospitals cannot cope with capacity of more people needing their services
Craig Bowers	Yes	Our infrastructure can not cope with more roads/ vehicles on it. All of our green space is being used making Medway less appealing to the residents that have lived here for many years. Our public services are stretched already we do not need more strain on these.
Sharon Oggee	Yes	
Eve Shields	Yes	
James Mickleburgh	Yes	I agree with all my objections last year and all of the ones as listed above
Bhavia Thaker	Yes	
Jamie Arnold	Yes	We don't need housing development what we need is hospital, dr surgery, schools
Jacqueline Evans	Yes	Lower Rainham Road and surrounding roads through Rainham cannot cope with current traffic levels. Constant congestion in the mornings. Trying to get my children to school is a regular battle. The introduction of yet more houses is ridiculous.
Alan Nairn	Yes	Destroying one of the last green spaces in what was once a lovely place to live is deplorable and devastating for the natural environment. The local infrastructure does not support the current population as it stands. Do not allow this to happen!
Phil Curry	Yes	As building on this site has already been refused due to it being a totally unsuitable place to be built on. The infrastructure cannot cope with all the new homes that have already been built without adding more homes. If there are road closures Rainham already becomes gridlocked. We do not have enough GPs or dentists and it would put e
Jane Fullagar	Yes	Planning for this area has already been refused by the highest office possible, as it would not only destroy and area of outstanding beauty but create chaos on the local infrastructure. Nothing has changed since the first refusal so to add this site to the local plan is sheer lunacy.
Suzie Brown	Yes	The area at the moment is constantly gridlocked due to the amount of cars on the roads in the surrounding area. The area cannot take any more cars which would increase if the housing development took place. The infrastructure will not be able to withstand the extra people that would want to be using it and it will be a huge shame for m
Ralph Beebeegun	Yes	
Lita Davenport	Yes	Without adequate infrastructure the area cannot cope with further housing, the roads are congested and the local hospital is already overwhelmed
Juliette Eastwood	Yes	Our orchards and green spaces should be protected. Roads in the area are already unable to cope with volume of traffic
John Hill	Yes	Insufficient infrastructure to accommodate development
James Lowther	Yes	The local infrastructure cannot support the level of development currently happening in Medway
Caroline Wallis	Yes	Medway is at a breaking point
Charley Gardner	Yes	Traffic is enormous as it is far too many houses being built with no additional health or school services. Rainham is grid locked and will only get worse if this is allowed to go ahead.
William King	Yes	
William Gardner	Yes	
Tracey Tarr	Yes	
Jill Plumb	Yes	
Jill Pembroke	Yes	The amount of development already approved and that built like Hempstead Liding etc is going to cause extreme traffic problems and air quality
Maria	Yes	
Katherine Stockey	Yes	The town cannot cope with more houses!
Christopher Nomidge	Yes	I think Rainham has already dealt with more than enough new housing developments over the last few years. Maybe Angela Rayner should build them in her back yard
Julie Szyer	Yes	
Bridget O'Connor	Yes	We do not have the infrastructure in place to cope with these housing developments and enough of the surrounding green space has already or is being built on. No more!
Tracy Walche	Yes	
John J Batcock	Yes	The destruction of 40,000 to 60,000 trees is unbelievably naive, the damage caused is immense, not only to the atmosphere, but to life itself. The infrastructure of the area surrounding the designated development does not support the amount of extra people, vehicles and domestic animals. Water, gas and electric supply will be difficult. S
John Wilshe	No	
Chelvey Wilshe	Yes	
Martin Bushell	Yes	The impact on the local area and we need trees For our health and environment
Diane Haggett	Yes	
Nicola Griffiths	Yes	
Simon Morris	Yes	
Olivia Sterry	Yes	
Connie Sterry	Yes	
Albie Sterry	Yes	
Nicola Haynes	Yes	It is a constant stream of building with no infrastructure to support it. We need to protect green spaces for the future. There is too much pollution in this area as it is. Our children will never even know a green space or a fruit tree if we keep going like this.

Name	Do you reaffirm your objection to the destruction Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Ida Doherty	Yes
	Dear all
	I am writing in regards to the Rainham Parkside Village, Lower Rainham Road proposal that (as I'm sure you are aware) proposes 750 homes, public green spaces, community centre, primary and secondary schools along with commercial uses for the site. Esquire Developments Ltd to host public consultation events for 750 home scheme
	My email comes to you all as a concerned resident with the following concerns regarding the development:
	The local infrastructure can barely handle the current demands of local people, especially considering frequent closures over the last few years of the Lower Rainham Road for road works and road works on London Road, spanning between Rainham and Bowaters Roundabout. Both these roads are also necessary 'work grounds' for residents
Thomas Francis	Rainham Community (Kent) Rainham gridlocked again not sure why? Facebook Traffic chaos in Gillingham and Sittingbourne as drivers avoid M2 coastbound closure
	Water demands for the area are already stretched and parts of Kent are on a hosepipe ban. Frankly, it would be very surprising if Southern Water does not introduce one in the coming weeks. How will the increased demand for water that these additional residences and commercial spaces be met? The following article highlights that the SE
	Seven regions in England will face severe water stress by 2030 as Brits significantly underestimate their daily water usage - Water Magazine
	London Borough Councils (as reported by the Daily Mail) have spent more than £140 million buying homes to house their own constituents in Kent (amongst other counties), if the development goes ahead, I would certainly argue that residents of Medway are given priority and that the homes are not sold to London Borough councils to off
	London council chiefs spend £4million to send homeless people out of the capital by snapping up hundreds of properties in deprived areas elsewhere in England Daily Mail Online
	I have today gone to the meeting at The Oast Community Centre to ask some questions regarding infrastructure, water demands and who will be purchasing the houses. I didn't receive any satisfactory answers to any of my questions. The representatives constantly gave unrealistic and spurious answers to the valid points mentioned above
	Of course, those meetings are designed to hear the local concerns so they can try to mitigate any unknowns before the proposal is finalised and submitted to Medway Council. But, I believe there are some factors like those listed above that cannot be mitigated. I have brought my and other local residents' concerns to you all and hope that
Doreen Moretsele	Yes
Chris Dyer	Not enough schools, water and losing green space. Overcrowding, busy roads!
Elke Edy	Yes
Peter Edy	Yes
Zoe Sindrey	Yes
Lyndsey Van Wyk	Yes
Trevor Kew	Yes
Janet martin	Yes
McCarlen	No
Sarah Carla	Kent is meant to be the garden of England but all these developers are taking away our countryside. More houses means less countryside, more stress and pressure on our roads, hospitals, schools, GPs etc and more pollution from cars!
Maggie Hall	Yes
Mark Simpson	Yes
Peter Adley	Yes
Ruth Morgan	Yes
Heart Morgan	Yes
Hannah Childs	Yes
Beverly Appleford	Yes
Nikita Azyner	Yes
Emma Tagg	Yes
Jenny Hayes	Yes
Linda Platt	Yes
Carol Osborn	Yes
Connor Vick	Yes
Kimberley Nicholas	Yes
Sarah Dobson	Yes
Kelsey Brooker	Yes
Patricia Distefano	Yes
Mark Vick	Yes
Michael Lawrenceon	Yes
Courtney Vick	Yes
Patricia Conway	Yes
Rebecca Haigh	Yes
Jonathan Haigh	Yes
Derek Woolder	Yes
Alec Jackson	Yes
M. Chambers	Yes
Noreen Jackson	Yes
Mr A Distefano	Yes
Barbara Hulley	Yes
Christine Harris	Yes
Nigel Hall	Yes
Rachael Vick	Yes
Andrew Nicholas	Yes
Christine Sandman	Yes
Tammy Nicholas	Yes
Linda Woolder	Yes
Vicky Simmons	Yes
Geoff Jones	Yes
Deb Bell	Yes
Val Wicks	Yes
Denise Wheal	Yes
Michael Wheal	Yes
Dave bell	Yes
Enma Tuckey	Yes
Luke Tuckey	Yes
Richard Newnham	Yes
Ian Webb	Yes
Fay Bendell	Yes
Dee Alp	Yes
Joanne Newnham	Yes
April Millgate	Yes
Jane Randall	Yes
Linda Brophy	Yes
Daniel Walters	Yes
Neel Aluwalia	Yes
Natalie Aluwalia	Yes
Emily Walters	Yes
Brenda Williams	Yes

Name	Do you reaffirm your objection to the destruction Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Gwendoline Hall	Yes
Amanda Sands	Yes
Ellie Last	Yes
Rachel Last	Yes
Catriona Kerr	Yes
Darren Sands	Yes
Finann McKinlay	Yes
philip Brunning	Yes
D R Chapman	Yes
Zoe Chaoman	Yes
Joy Da is	Yes
Adrian Last	Yes
Clifford Ince	Yes
Tracy Ralph	Yes
Jayne Hehr	Yes
Annie Kew	Yes
Lesley radford	Yes
Sarah Easton	Yes
Roger Radford	Yes
Ryan Underhill	Yes
Kelly Pearson	Yes
Peter Kew	Yes
Owen Ralph	Yes
Carol Fox	Yes
C Drake	Yes
Shufen Akbar	Yes
Margaret Sainsbury	Yes
Greta Akbar	Yes
Ashley Vardy	Yes
A Garland	Yes
Martin Spakovskis	Yes
Nicholas Wallbank	Yes
Melvena Wallbank	Yes
Vicky Hudson	Yes
Barry Knight	Yes
Diane Remvoize	Yes
David Low	Yes
Sarah James	Yes
Russell Smith	Yes
Hannah Brunt	Yes
Anita Brunt	Yes
Shane Aldridge	Yes
Rita Hewitt	Yes
Gillian Rumsey	Yes
Paul Drake	Yes
Gill Watts	Yes
Corinne Noss	Yes
David Hunt	Yes
Iain Alan	Yes
Christine Alan	Yes
Daniel Stocking	Yes
Patrice Pigram	Yes
Susan Barlow	Yes
Kathryn Viera Cruz	Yes
Jeremy Bell	Yes
Laura Willoughby	Yes
Tony	Yes
Sarah Amos	Yes
Anne Prescott	Yes
Ian Prescott	Yes
Jean Clare-Tighe	Yes
Tim Lyne	Yes
Barbara Sutton	Yes
Sara Kay	Yes
Valerie Lloyd	Yes
Trevor Lloyd	Yes
Helen Hardy	Yes
Luke Stevens	Yes
Kay Davis	Yes
Michael Davis	Yes
Daniel Smith	Yes
James Hamant	Yes
Ronnie Smith	Yes
Kathryn Auger	Yes
Brian Beaton	Yes
Jacqui Mankelov	Yes
Joe Roseman	Yes
Clara Boot	Yes
Carol	Yes

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Tina Boot	Yes	Land is land for a reason and not to be built on. There's too many houses being built in the area without thinking of the infrastructure of everything around it. Please don't DESTROY more land as its really beautiful around there and there will be more traffic and more fumes that'll destroy it too.
Kevin Harriid	Yes	Additional housing without supporting infrastructure would severely affect the road network, water supply, and waste water handling to an already overloaded networks. Add to that the additional doctors places, dentist places and school places. We've seen countless developers promise a doctors or additional school only for them not to
Lou Harriid	Yes	Traffic congestion will increase making trying to leave Rainham exceeding difficult, especially if Lower Rainham Road is closed again for building works. Air quality will suffer, school places will be even more limited in the future, as will Doctors appointments and health care services both of which are already compromised. Losing green
Stephen Smith	Yes	
Diana Dominican	Yes	I have lived off Pump lane for 25 years. The crows are having a natematural agitate and the roads are getting busier and busier and congested. We do not have the space nor infrastructure to support this development and I oppose this
Lorna Smith	Yes	
Macey Dominican	Yes	
Chloe Dominican	Yes	The orchards are an important part of our area's heritage, biodiversity, and community wellbeing. Replacing them with housing would permanently destroy a unique green space that supports local wildlife, including pollinators and other species already under pressure. The orchards help improve air quality, reduce flood risk by absorbing re They also contribute to the character and identity of our area - something that cannot be replaced once lost. This green space is valued not just for its environmental role, but also for the health and recreation benefits it offers to residents, including walking, foraging, and connecting with nature. Given the climate and ecological crises we face, it is vital to protect existing mature green spaces rather than replace them with developments that increase carbon emissions and reduce biodiversity. Sustainable development should work alongside the preservation of important natural habitats like the orchards, not at their expense.
Deb Perez	Yes	
Jayne Mickleburgh	Yes	As above
Rachael Mickleburgh	Yes	Congestion on the roads will cause big problems and will not help the environment.
Lorraine Liddy	Yes	This is a small town that is already overcrowded, has limited green space and does not have the infrastructure to support more housing
Nick Grief	Yes	
Gemma Grant	Yes	The scheme fails to safeguard important landscapes and would cause serious damage to their integrity, as well as undermining the site's role as a vital green separation between built-up areas and the Medway Estuary. It would bring extensive development across the land, leading to the loss of fertile, high-grade agricultural fields, while its
Maureen Bill	Yes	The loss of all these trees will not only affect wild life, they can help keep the atmosphere cleaner for we humans as well. More houses will bring more cars,more pollution ,more noise, more mental health problems, plus cutting down all those trees would be sacrileg! Money can't and shouldn't, buy everything.
Irene Francis	Yes	The town's infrastructure can't support any more houses!
Beth Howgill	Yes	
Matt Sanderson	Yes	There are several other new estates that have been built or are in the process of being built in the immediate area, following the previous refusal of this planning application. the underlying reasons for the previous refusal still stand and are reinforced by the further development and detrimental effect the over development is have on the a
Maria Paice	Yes	This large development is an assault to the nature and biodiversity of the area. Building in Rainham is already putting a strain on local services.
David Lindsay	Yes	
Pauline Trowell	Yes	The infrastructure cannot sustain the current housing expansion let alone the proposed new development.
Fiona Delahay	Yes	
Marilyn Stone	Yes	
Jan Moore	Yes	
Penny Giles McLough	Yes	
Carol Pemble	Yes	
Liz O'Hanlon	Yes	I'm leaving rainham asap. The place is too
Don	Yes	Stop building in greenfield spaces for a fact leaving the locals to bear the brunt of the greed . There are plenty of open spaces outside of the southeast Local roads will be gridlocked,overpopulation will negatively affect local hospitals,doctors ,roads etc... How is a great environment, which holds great wildlife and a beautiful, peaceful environment for residents,farmers and wildlife.
Malcolm Eastet	Yes	Present facilities cannot cope roads hospital
Victoria Arnold	Yes	
Liam McGoldrick	Yes	
Margaret Berry	Yes	
Simon Field	Yes	The road infrastructure wouldn't cope with the extra traffic. The lower road and beechings way is extremely busy with traffic from all recent developments not to mention all the air pollution. Also the sewer system seems to be at full capacity as well as the electric grid in the area with a lot of recent power cuts in lower rainham.
Ronald Mills	Yes	750 additional cars exiting pump lane would cause additional traffic delays. Pump lane is single lane with passing points. Motney Hill already has tankers on an almost daily basis, an additional 750 horse would either increase the number of tankers (MTS) or discharges into the river Medway.
Helen Baxter	Yes	Already been rejected once, Rainham has been massively (over) developed since.
Amanda Lyle	Yes	More Houses means the need for GP surgeries, schools,the local hospital is already bursting at the seams, the planning inspectorate don't think of this.
Liz Scarboro	Yes	We simply do not need yet more low quality estates on what little remains of the green space in our towns. Wealthy greedy landowners should not be able to overturn perfectly good reasons why the orchards were not developed previously in the simple pursuit of money.
Sharon Cooper	Yes	This will have a disastrous effect on the environment and the community. The orchards are important, viable agricultural land and we have lost enough of this type of land already.
Elizabeth Hawkins	Yes	Our roads are already congested with rainham being like a car park during rush hour, our local hospital already struggles to cope and it is virtually impossible to get a GP appointment.
Anita Laker	Yes	
Hayley Burton	Yes	We need the country side. We need the orchards. Stop felling perfectly good land and trees. Lots of people walk through the orchards and enjoy them. The roads are already overloaded with traffic. The surgeries are all full now and you can't get an appointment! Medway hospital can't cope with any more patients. If you're lucky to get a referral to hospital you have to wait several months. Lots of roads are clogged with too many parked cars. We don't need any more londoners here. Selling there London homes high and buying up our houses so our own kids can't get or afford the houses in the area! Leave Rainham Wigmore hemstead and Rainham countryside alone! Enough is enough! And we have enough homes here!
Mel Banks	Yes	Stop building on green spaces and farmland The air quality is already poor in the area and the local infrastructure can't cope with the traffic it has. Cutting down the 60,000 fruit trees and then burning them and also cutting down the wild hedges is going to pollute the air drastically locally and will have a drastic detrimental affect on the abundant wildlife in the area and effect the health of the current and future residents of the local area. I live close to the orchards and I have had swells and bats fly over my house at dusk on summer evenings for 43 years. If the orchards go my asthma will suffer and my mental health too as I get alot of joy from sitting outside and watching the birds and the bats every year.
Simon Davis	Yes	
Emma Kent-Smith	Yes	
Karen Cuthbert	Yes	Services are already at breaking point, the lower road is not fit to take the volume of traffic that uses it now let alone additional vehicles Rainham is at capacity
Sarah Friday	Yes	The roads cannot cope, the hospital is on its knees and we need our orchards
Jaime Baxter	Yes	Infrastructure hasn't changed since last time
Dorina Megham	Yes	
Laura Frost	Yes	The local area is not able to cope with more homes. The roads are always gridlocked, doctors appointments impossible to get and schools are struggling.
Victoria Swenston	Yes	
Terrance Marlow	Yes	were over whelmed with the traffic and our infro structure is struggling with the residents we already have also there will be no green space left ! this is supposed to be the garden of England !!
Tassey Swift	Yes	Destruction of this area - yet AGAIN caused issues to community / environment / nature habits and environmental concerns for all
Carol Pires	Yes	
David Harlow	Yes	We don't need any more destruction on our green farm land
Bradley Moore	Yes	
Jason Harper	Yes	
Jennie Bowden	Yes	As with all of the points listed there is also the lack of school, doctors, hospital to support this volume. The road cannot cope neither can the local resources
Nick Humphrey	Yes	
Sara Spellman	Yes	This was an awful idea in the first place, which was proved in a court of law It's still not a good idea and for Medway council to think it is, is lazy, hypocritical and narrow minded.
Karena Sweet	Yes	This would be devastating for wildlife, the loss of valuable farm land that can never be replaced and housing that will probably be unaffordable to locals. Medway is just becoming an extension of London. I have lived here all my life and it has never been so bad as it has in recent years, I feel all our green areas are being taken away.
S Philpott	Yes	Leave well alone
Clifford Wright	Yes	The orchards is an important area for the environmental health of the area and the wider community
Angela Balcombe	Yes	
Paula Murphy	Yes	The plan is flawed. No answers to the original plan which was rejected have been answered. The lower road cannot cope, but in all, it destroys huge amount of habitat for local wildlife and suburban animals. The loss off which and the result of which will be catastrophic
Annabelle Chesson	Yes	Stop developing on agricultural land and stop building houses with no regard for the impact on our roads, our services especially water and sewage, and our health care and education services.
Alison Smith	Yes	
Dave Morris	Yes	
Carla Funai	Yes	We need better roads to support this development and more doctors and schools, keep building and not putting other services in place will put lots of pressure on a struggling village/town already
David Jones	Yes	Precious little open space left in the area. do not lose this valuable community amenity please.
S Hudson	Yes	The lower rainham road and surrounding area are unable to cope with the traffic now let alone more developments. Lack of infrastructure to support all of these new housing developments in Rainham. Try getting to work on either the A2 or lower rainham rd is now a nightmare. Where is the schools, hospital, GP's let alone the destruction of the natural environment. Rainham was a green area with lots of nature, all these houses are now ruining this.
David Brown	Yes	
Gillian Bowie	Yes	Once this land is concreted over, there will be no going back. We need to be able to grow food in this country. We must not rely on imported food!
Rob Russell	Yes	

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
B.E. Thom	Yes	Additionally, wildlife will lose their natural environment and homes; albeit land/water/sky based.
Mark Sinclair	Yes	
Nicky Gardnee	Yes	
Kesley Heather	Yes	Isn't traffic bad enough already? Isn't getting a drs appointment hard enough already? The battle to get your child into the closest school? Garden of England not building centre of England
Victor	Yes	
Deborah Tills	Yes	Sewers can't cope as it is, not enough police, even the contact centre has closed, roads won't be able to cope, not enough GP in area , maybe build GP surgery first.
Morgan Thomas	Yes	
Christine Daly	Yes	
Victoria Wentworth	Yes	The lower road cannot cope with more houses and road without having a severe effect on day to day running and out wonderful wildlife. This has been shown when the road has been closed causing dreadful traffic problems around the local area. Also Medway hospital cannot cope with anymore residents, it is on its knees already, maybe
Rheanna Robson	Yes	
Nicola Dawber	Yes	
Anne Webb	Yes	
Vanessa ABear	Yes	No proper infrastructure. Extra doctors. Road access
Mitch Brewer	Yes	This proposal within the local plan contradicts the general principle of the alleged plan in that it states to provide green areas, infrastructure, etc. however this proposal adds to an already congested area of Lower Rainham, which already has significant traffic issues in particular; an area that late at night or when not busy can take ten minu
Meryl Brown	Yes	We need our green spaces and to keep the orchards. because we need trees to get rid of the c2o. Medway has a high pollution rate. We need to keep them for the bees and wildlife. we need to keep our green spaces for people to go on walks. for health, wellbeing and getting the health benefits connecting with nature , releasing feel good hormones , it's proven that connecting with nature is better for health , the fore helping local GPs and patients. how is Medway Hosp And the lower Rainham rd is not a main road to cope with all these cars, more accidents will occur , and Rainham will be at a gridlock
Alison Mant	Yes	Where is the infrastructure for all of the extra traffic congestion, should either the Lower Rainham Road be closed or the A2 - Rainham becomes totally gridlocked. The proposed building works will increase the amount of heavy traffic along roads that are already heavily congested. How is this good for the air quality when the trees have be
Dorothy Nicholson	Yes	Where will be the extra beds at Medway hospital be coming from to cater for the massive increase to the population in the area, school places, or doctor and dentist surgeries that are already full, and water, gas, electricity and internet supplies. More road works, more congestion.
Diane Harris	Yes	What about parking the area? The local drop in office in Station Road, Rainham has now closed and there are no local police stations anymore
David Nicholson	Yes	No Road infrastructure to cope
Lisa Crowley	Yes	Don't ruin Rainham!
David Pembroke	Yes	We can not afford to lose anymore green spaces ! FOOD SECURITY is national security. STOP BUILDING ON AGRICULTURAL LAND! We have lost enough
Justine Summers	Yes	
Damian	Yes	
Jill Haden	Yes	Please leave this beautiful piece of countryside
Pat	Yes	
Jodie Hazell	Yes	Not enough resources in the area to accommodate more people.
John Morley	Yes	I strongly object to the proposed development of new houses in High Holston. Ours is a small, historic village with a unique character and heritage that would be irreversibly damaged by large-scale building. We have only one main road in and out of the Hoo Peninsula, which already struggles with congestion, and our limited infrastructure
Margaret Morley	Yes	The never ending sale of green areas especially the few orchards left in the area and building more houses must stop. Any sensible person must know that all services in the Medway towns are stretched to breaking point. Where will it end. All for profit. The council must not agree to this. The developers will promise the world and delive
Laura Reynolds	Yes	Added pressure on all medical services in the area which are already stretched to capacity. Added pollution in the area due to the increase of traffic which will also cause so much congestion. Loss of agricultural land which is so valuable to all which would be lost forever and replaced with mainly concrete.
Daisy Clarke	Yes	This will have a massively detrimental effect on our ecosystems, this area is already struggling from over development. We face daily power cuts, over subscribed schools and doctors, only one hospital which cannot cope. Roads and transportation systems cannot handle the influx of traffic and any downpours of rain now cause flash floo
Ashleigh	Yes	
Susan Radron	Yes	
Mike Mant	Yes	Yes, there appears to be a need for new housing, as set out by the current Government's assumption that this country must build a huge number of new homes. This means that Local Councils are desperately seeking to build new housing on any piece of green land they can find, especially in Medway, where, soon, if the Council get their we
Margaret Bartle	Yes	None of the proposed building sites currently springing up, or proposed, seem to be offering affordable housing for new buyers. So none of the proposed 750 new homes on the Pump Lane development plan fall into that category, nor is there any consideration for the huge increase in congestion and subsequent to the local population of the
Linda Jennings	Yes	The area that is already heavily populated and congested. The roads cannot cope with the existing traffic, especially when there are another set of roadworks and road closures along the Lower Rainham Road, so there is a problem on the M2 and the traffic comes off the motorway onto the A2 to bypass the hold-up and crawls through Rain
Helen Hansen-Hyl	Yes	The previous proposal in 2021 to sell this land and build new housing was defeated for a number of reasons, and those reasons still remain. The road system just cannot cope with the extra traffic that will occur should this go ahead. The current infrastructure will not cope with the increase. Where are the plans for extra doctor and dentist
Sarah Toomer	Yes	There is nothing that warrants that this development should go ahead. The destruction of local wildlife habitats will also have an impact. I support the objection to this proposed development and it should be removed from the local plan.
Alexander Toomer	Yes	Community resource
Jane Rudd	Yes	
Leigh Simpson	Yes	
Tracy Brewer	Yes	This is prime agricultural land with mature trees producing food for this country. Not only is it producing food the trees are absorbing pollution, providing precious habitat for insects, birds and mammals. They are also preventing flooding. All the reasons for previous refusal to develop this area are still valid.
Rachael Troshurst	Yes	Instead of trying to comply with arbitrary quotas we need you to be pushing back and protecting this vital resource from annihilation.
Tom Troshurst	Yes	I live facing the fields and see red kites every day and all the lovely beautiful animals frolic insect when we are at our allotments.
Jackie Baker	Yes	
Jennifer Smart	Yes	
Natalie Williams	Yes	The local infrastructure will not be able cope with the massive amount of extra traffic a development of this size would generate. We have precious country lanes left and do not want to lose any more by them being widened to cope. The air quality over the whole of Medway will soon be unacceptable.
Laura Clark	Yes	There is not the infrastructure locally to support this level of building. Lower Rainham road is already at breaking point for traffic not to mention the additional pollution this will bring.
Ashley Dunning-McM	Yes	
Zoe Low	Yes	
Patricia Rose	Yes	
Sarah Harris	No	The local infrastructure will not be able cope with the massive amount of extra traffic a development of this size would generate. We have precious country lanes left and do not want to lose any more by them being widened to cope. The air quality over the whole of Medway will soon be unacceptable.
Clare Cheahle	Yes	There is not the infrastructure locally to support this level of building. Lower Rainham road is already at breaking point for traffic not to mention the additional pollution this will bring.
Nikola Noyes	Yes	
Sibbhan Holden	Yes	
Janeline Prewaga	Yes	
Barnet Cheahle	Yes	
Orly Treibly	Yes	This area has a historical own haracters that this project will destruct.
Alan Bryant	Yes	
Carol Cook	Yes	Damage to/loss of local environmental eco system. Local hospital and GP surgeries are already overstretched. Road networks are already poorly maintained and will be expected to take a greater weight of traffic. Substantial building has already been made in the area. The type of houses being built are not affordable to people living and w
Karen Reid	Yes	Even if we accept that we need more housing in this area - which I don't - the infrastructure barely copes now so I do not see how another 750 homes in Lower Rainham is going to improve anything. There are already several new developments on Lower Rainham Road which are destroying trees and wildlife environments in that area. Spec
Stephanie Bradley	Yes	
Ch'Yau	Yes	My son lives directly by the proposed housing site so I use the lower rainham road very often. It is already way too busy for the current traffic and can't possibly take anymore.
Sharon Gooda	Yes	We should identify wasteland and other industrial sites instead of destroying green areas, especially if they are producing food for the UK.
Martin Rose	Yes	No supporting infrastructure. Local roads at breaking point.
Tom Nicholas	Yes	This proposal is inappropriate for a location so remote from other centres and risks ecological damage and would irreversibly remove another part of North Kent's agricultural heritage.
Jackie Jarvis	Yes	Anyone who thinks this housing development is a good idea clearly doesn't regularly visit Lower Rainham Road, especially at peak times. It is already highly congested with bottlenecks. Rainham has already had an unfair share of houses building compared to other towns and I say that as someone who regularly travels to other areas both i
Barbara Wood	Yes	If you stop selling off land and housing to London boroughs we wouldn't have the need to destroy our orchards.
John Wood	Yes	More animals & wildlife needed! - stop destroying nature!
Anne-Marie Salmon	Yes	
Shella Hayward	Yes	Nothing has changed since the last objection apart from the roads are busier than ever. Where are all the extra cars going to go? The infrastructure can't cope now how will it cope in the future and where are all the extra schools and GP surgeries?
Tracy Shapland	Yes	If you stop selling off land and housing to London boroughs we wouldn't have the need to destroy our orchards.
	Yes	We need more agricultural land for food production not less due to the growing population. Also traffic around this area is already a challenge, this proposal will exacerbate existing problems.
	Yes	We don't have the infrastructure for any more housing

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Ruth Derry	Yes	Environmental issues Traffic Pollution Facilities: GP's/hospital Loss of trees and wildlife Rainham cannot cope with anymore new properties on our green spaces. We cannot keep destroying trees and in turn wildlife, polluting the air, we cannot cope with anymore traffic. Public transport is so poor in this area and so expensive, there will be more cars on the roads. All these houses with no consideration for the environment and the amenities.
Susan Salter	Yes	Having lived in Rainham for over fifty years I am appalled at the destruction of our countryside without even considering the local people whose lives are impacted with traffic congestion, pollution, lack of healthcare and our local hospital which is at breaking point now - without a population increase of at least two thousand. Which is in
Tracy Hawkesley	Yes	Yet again another attempt to destroy our countryside. Medway is already beyond capacity for more housing. Our roads hospitals and infrastructure can't take anymore strain. I vehemently oppose this proposal.
Brian Ford	Yes	There are more than enough Houses in this general area. There is not the infra-structure to support and further large housing estate. The local hospital is under extreme pressure to deal with the current state of ill health, added to that the current schools, bus service. shops would find it extremely difficult coping the a large increase to the c
Jo Harber	Yes	
Celia Turner	Yes	
Nicola Carlow	Yes	Rainham is already overwhelmed by the amount of traffic going through, completely gridlocked. Removing green space will exacerbate the issue. Also the local hospital will not be able to cope with the further housing, it is also overwhelmed by the numbers which pass through its doors on a daily basis.
Jak Turner	Yes	
Shirley Chikerty	Yes	
D Scott	Yes	
Julie Best	Yes	This is a vital space grade 1land wildlife habitat. Crazy idea.
Diane Marktlow	Yes	The traffic is already at saturation point in that area, the small road just won't cope with more. We need this good land to grow our food and help make the area pleasant for our children and their education.
Michael Marktlow	Yes	Our small pleasant 'village' has no more room, please leave the green areas alone.
Nicola Johnson	Yes	
R Harwood	Yes	Medway is at breaking point. Medway will not benefit in the long run. Have engines off signs but encouraging thousands of more cars and lorries for building, losing green spaces as jury 1 example.
Trudy Barnett	Yes	For all of the reasons above. Our agricultural spaces need to be protected! Also the impact this will have on local services is huge
Gill Ransley	Yes	There is far too much traffic in the area already and the services eg GPs, hospitals etc are struggling to cope.
Stacey Branchett	Yes	
Paul Lovatt-Smith	Yes	
P D Edwards	Yes	There are no plans for the infrastructure of the area. The roads around are already not sufficient for the traffic now. No plans for additional road.
Rachel Lane	Yes	
Kenny	Yes	
Grace Vodo	Yes	
Yvonne Tong	Yes	The land serves a purpose for nature and all wild life. Bees especially. Our towns are already clogged up with cars sitting in traffic. Enough is enough
Sharon Ison	Yes	
Christian Moore	Yes	Stop selling housing stock to London borough councils.
Liam Roadright	Yes	This is not a viable option for development and will exacerbate the issues of Gillingham/Rainham to an unsustainable level!
Laura Dias	Yes	
Maxine Harding	Yes	
Michelle Pegley	Yes	
Joanne Lowen	Yes	
Kenneth Campbell	Yes	The traffic congestion along the lower road would worsen enormously and where would all the wildlife go??
Margaret Rain	Yes	The local roads will not support more traffic schools doctors dentist can't cope with any more people
Russell Poynter	Yes	You can't keep building on high class agricultural land and you can't improve any of the road layouts in Beechings Way or the Lower Rainham Road. The traffic is already a nightmare, especially around work travel and school drop off / pickup as we already have RMSOS on our doorstep. The local primary school in Teydall is not full and it pu
Rajni Phasfar	Yes	I have only lived in the area for 3 years but the general quiet and lack of housing developments everywhere is what attracted me to the area.
Elizabeth Poynter	Yes	
Elyssa Donoghue	Yes	
Sarah Moakes	Yes	Footnote 65 to NPPF para 188 states that 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.' It has not been demonstrated that no suitable alternative sites of a lower agricultural grade are available.
Natalie Moore	Yes	Stop building to make money! Appreciate what we have.
Lucy Peters	Yes	The lose of Nature and green space speaks for itself, the traffic flow on the small roads cannot be managed.
Emma Tatt	Yes	
Connor Stickings	Yes	
Robert Wood	Yes	The infrastructure in the immediate area cannot sustain the extra vehicles moving through to the main roads, and the general area is suffering from lack of medical & educational facilities. Adding this extra housing along with other developments will just cause more issues.
Norman Ives	Yes	
Naomi Reddington	Yes	
Celia Campbell	Yes	I have lived here for 47 years and recently there have been an influx of new houses being built. The Lower road is busy enough at the moment and gets jammed with traffic already. I'm not sure how much extra traffic it could take as most houses have at least 2-4 cars each. I have started to notice a decline in birds in the area further develo
Joseph Burroughs	Yes	The lose of natural farm land. There must be more suitable brown field sites near to existing gas and electricity supplies.
Danielle Dickinson	Yes	The roads and infrastructure cant cope they are regularly brought to a grinding halt. Please save the space for our children
Paul Aluwalla	Yes	Places like the orchard is our families future to keep the air clean. No road network to support such a estate
Sue Tang	Yes	Green spaces in nature are vital for peoples' physical and mental health. Please don't destroy them as once this has been done, there is no going back.
Harley Moss	Yes	
Jan Reynolds	Yes	Stop destroying our countryside and able land
Melanie Newnham	Yes	We need to save our agricultural land.
Maureen Lawson	Yes	Roads can't cope now with the traffic Medway hospital or Doctors surgery. Losing wildlife and greenery. Losing our greenery destroying the wildlife too much traffic on our roads too much pressure on ourhospital not enough room in our schools or doctors
Dan Breen	Yes	
Georgia Moss	Yes	
Keith Field	Yes	To many houses being built on prime agricultural land.
Peter Lawson	Yes	Losing wildlife roads can't cope with the volume of traffic hospitals and Doctor surgeries
Edina Swift	Yes	GPs, Hospitals and schools in the area are already full to capacity. The roads throughout Medway are no longer suitable for the increase in traffic and certainly could not cope with any more in Lower Rainham Road or the main A2. It is also vitally important that Agricultural land is kept for food to feed the nation.
Lorraine Theobald	Yes	It's already a nightmare trying to get to and from work with all the building work going on in and around rainham especially when either the top or bottom roads are closed as much as they are they can't possibly take any more traffic on them
Jacqueline Simmond	Yes	Roads are already dangerously busy. Not enough doctors or hospitals to cope
Michelle Taylor	Yes	Orchards can help mitigate climate change by absorbing carbon dioxide from the atmosphere.
Lynn Diprose	Yes	
Pauline Dane	Yes	Before moving away from Rainham 2 years ago, I lived there for over 40 year and walked that route every day seeing many different rare species aswell as native. You can't disturb these homes
Belinda Liffen	Yes	The roads around Rainham are struggling without all the extra transport that these extra building works will bring!
Christina Rampota	Yes	
Diane Rose	Yes	I am against anymore traffic in Pump Lane and the destruction of all those trees
Doug Monk	Yes	More houses, although needed is no good when there is no additional infrastructure to compensate for the additional residents, in an area already massively expanded due to new builds.
Anna Powaga	Yes	Yes please.
Lynda Collins	Yes	
Ian Turnbull	Yes	All the same reasons the last plan was rejected remain the same or are actually worse. The last plan was for 1250 homes with 3 access roads. This plan is for 750 homes with 1 access road. There has also been 7 other housing developments on or around the lower Rainham road area, with more in the pipeline.
Joanette Hodges	Yes	In addition to the traffic issues on an already struggle road the infrastructure in this area is not in place for the continuous building. Just building schools is not the answer. Medway Maritime hosp cannot cope as it is and we are already having to cope with continuous sewage being discharged into the sea.
Carina	Yes	Someone needs to listen to the genuine concerns of residents. We do not have school places, doctors available or police services to cope with the expanding population. We must not build on anymore agriculture land. Use the high streets and industrial land that are becoming obsolete.
Zona Jagger	Yes	You will be decimating land our wildlife depend land food grows on we don't need anymore unaffordable cheap built houses
Julia Kemp	Yes	The area has already to many new developments and the roads surrounding this are unable to accommodate any more traffic.
Stacey Beale	Yes	We live in a beautiful area. These houses that are being built everywhere are taking that away. Rainham has a lovely community spirit that is being taken away by more and more houses. Not to mention the amount of traffic these houses are going to create. There are so many other areas to build were these will be no issue
Gay Barnes	Yes	Our Local area is being bombarded with new houses and the roads and infrastructure cannot cope as it is ! Let alone there being additional cars and people from an extra 750 homes Destroying the farm land that creates food is non sensory to I do object to these plans 100%
Graham Daniels	Yes	Prime farmland is being used.Lower Road in Rainham cannot handle present traffic. Junction of Mersborough lane, A2, and Otterham Quay gets gridlocked, already cannot get doctors appointment/hospital overstretched/problems with water supply and sewerage...already too many people that our services cannot cope

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Lucy Simpson	Yes	
Marion Slater	Yes	Medway is already suffering from overcrowding Our Medway Hospital is already struggling to cope, and all NHS Services i.e. Dental, Doctors, not to mention a Water Shortage. More house's mean more residents putting further strain on already strained services. Also the impact on our already suffering wildlife will be devastating. Please th
Douglas Penneller	Yes	Rainham and Medway is in serious danger of being overrun by Medway Council's plans to make Medway a suburb of London which will bring drug gangs and other crime. Which will make Medway an unsafe place to live. Plus the traffic in Rainham A2 and the Lower Rainham Road is already gridlocked.
Ann Deaves	Yes	No building should ever be done on productive growing land or green open spaces needed. Too much bulding in the SE anyway, infrastructure appalling and still they build. Save the orchards for future generations, this orchard is a beautiful area in an ever increasingly busy world. Please leave it alone.
Rachel Bursey	Yes	
Simonne wells	Yes	
Jonathan Saunders	Yes	I object as the infrastructure simply does but exist plus the continuing attack on nature and wild life.
J Smith	Yes	Too much traffic going through, already congested - spoiling our country side/ villages
Siohan Shoebridge	Yes	Our green space is being taken up by many houses. There's 4 new build estates going up. The air is getting toxic. The increase in traffic volume will make a bad situation worse, having to travel along the Lower Rainham Road to work on time is often very challenging with constant road closures needed to provide amenities for the current new builds in the area. The local social infrastructure cannot cope already with the increase in volume of people needing medical attention, both primary and secondary education and general social interaction.
Mary Stone	Yes	We are constantly being reminded that our wildlife is under threat of extinction. Removing more of the natural environment forces all these creatures to move on but there is a diminishing area to go to as the shoreline is nearby. There are already serious issues with a water supply, sewage and power. Increasing use of these amenities means more problems to those of us already experiencing difficulties. This development should not go ahead.
Chris Stapleton	Yes	
Kyle Wilkinson	Yes	Our road network in the area is already under strain from the amount of new builds being constructed around lower Rainham. We are slowly losing our green spaces and all for new homes, Half of which are not affordable and the other half are given to social housing. The majority being to individuals that do not look after the area and ca
Scarlett Thomas	Yes	Rainham has so many new houses and the infrastructure to handle these many houses isn't considered. Without orchards we have not enough green spaces and clean air. Fresh produce is important too. What happened to kent being the garden of England?
Scarlett Heather	Yes	We do not need more unaffordable housing
Terence Sweeney	Yes	All the issues they considered when they rejected this application before. Perhaps the powers that be would consider compulsory purchase of this land for future benefit. of all.
Greta Christensen	Yes	The proposed development would significantly and irreversibly destroy the landscape character of Rainham. It is simply unacceptable that the development, which is purely profit driven, would even be considered for this site. Please be clear that Rainham residents do not support this development.
Valerie Powell	Yes	The road is not suitable for all the excessive traffic that would be made by such a development. Would spoil the environment also.
Natalie	Yes	
Elizabeth Allen	Yes	
Mia Norman	Yes	
Sally Beale	Yes	I personally am against the permanent destruction of our trees, countryside, and having more housing put in these areas. The destruction to the area, the wildlife, especially that area on the lower road, is unacceptable. The traffic etc is terrible as it is, it's not needed
Chris Ferguson	Yes	More than enough new builds in Medway already, with no consideration to infrastructure or pollution
Shari Lewis	Yes	
Kaye Sedgwick-Jones	Yes	This is a ludicrous development plan which has huge environmental and social impact on Rainham and the surrounding areas/ villages in both Medway and Swale. This continuous loss of farmland in this area is saddening as well is short term thinking. The impact on local services, from Medway Hospital and GP services to our water serv
Carrie Easterfield	Yes	People win out this again. The fact it is back into consideration is madness.
Melanie Mode	Yes	Rainham simply does not have the infrastructure to support more large scale housing developments. The hospitals, doctors, dentists and schools not too mention the roads are already under extreme pressure and cannot cope with the existing population so will not cope with additional people. Until there is adequate funding to improve th
Sue Carter	Yes	If houses are to be built then brown field spaces should be considered first not our lovely orchards.
Ian Mode	Yes	We should be promoting growing our own produce, not keep importing. Hypocritical of central government/local government to commit to climate change policies, yet do the opposite by destroying green land, which is key to healthier living for all.
C Downey	Yes	Stop rapping Rainham
Sharon Stanfield	Yes	Poor air quality and already overcrowded with traffic. Local amenities cannot cope as it is. Green space is needed for well-being not tarmaced over. Trees bring cleaner air we cannot take more away. Gridlocked roads as traffic is already saturated with cars. LRRoad cannot take more traffic. We do not need more houses in Rainham. Lower
Louisa Connor	Yes	
Ben Morling	Yes	
Matthew Stonely	Yes	
Julie Ince	Yes	Traffic congestion Pollution Damage to environment More road closures, causing gridlock, getting out of Rainham Weight of traffic causing even more damage to roads and pot holes Too much demand on local health services Too much demand on schools Loss of countryside Too many new developments in last 6 years Parking challenges near Rainham Station
Ronald Lean	Yes	Far too much of this beautiful county has already been destroyed by over development and extortionate levels of road traffic and further over crowding.
Hazel Arber	Yes	General infrastructure, surrounding roads already get blocked up due to more and more houses being built already around Rainham. We have one hospital catering for Sheerness, Sittingbourne, Newington and the Medway towns. No wonder it is always struggling. We are closing our nurseries through a lack of staff and our schools all are
M P Dempster	Yes	I consider it as over development with insignificant utilities, schools and health services to support it.
Anta Friday	Yes	There's no room on the sewer, there's not enough water supply, the roads are congested, the hospital can't cope. It's already too busy.
F Friday	Yes	You can't get a doctors appointment as it is, the hospital can't cope, the roads are too busy especially the lower Rainham Road and we need our orchards and green space
Scott Wralolu	Yes	
Ralph Curlewis	Yes	
James Foley	Yes	This is prime agricultural land that needs to be saved. Destroying this land will make it even harder for us to grow our own crops in the future
Lynn Wilkinson	Yes	We can not sustain any more traffic in this area or houses with multiple vehicles. We want our land back fir what it should be for food
Katherine Clark	Yes	There are not enough resources in the area for new houses and roads are already struggling with the amount of cars in Medway.
Jake Bryan	Yes	The proposal will affect the area. The locals don't want this, I don't want this. Stop trying to change where we live.
Marie	Yes	
David Eby	Yes	There is no infrastructure to support this development. Pump Lane is hazardous anyway with its large grammar school and having any large school in such proximity will be a massive safety issue to local residents and pupils. The pollution to the local area caused by the destruction of orchards and any building work is unacceptable. Local services are at breaking point and this will only serve to render them unusable. The surrounding road network is unable to accommodate new housing, lower pump Lane is not fit for this purpose and the Lower Rainham Road constantly has works going on and is shut more often than open.
Jim Bellars	Yes	Green space and agricultural land is essential to Rainham and Medway and once gone will be lost forever. It is vital to avoid filling the area with pollution of all kinds, air, noise etc and food from the orchards once lost can never be replaced. Roads, schools, Medway hospital and other facilities already stretched and under pressure will be further aggravated. The infrastructure can barely cope as it is. If housing is really desperately needed why not use brownfield sites and other spare land e.g at the Dockyard. This plan was rejected a few years ago, why is it being considered now when nothing has changed?
L Cole	Yes	
Richard Read	Yes	The local road infrastructure can hardly cope with the local traffic on the lower road and lower pump lane at the moment. The railway bridge at the top of pump lane can not take 2 way traffic. If there is a traffic collision at the bridge causing damage it will shut down the Victoria to kent coast route which is a major commuting route. Also th
May Hudson	Yes	If permission is granted then any wording such as maybe. Possible or could should be removed (regarding NHS or schools etc) with a very large fine if not built. (no get out clauses allowed)
Kathy Hickman	Yes	
Joanne Thompson	Yes	
Ian Thompson	Yes	I also cannot see how they can make public transport work for this location and therefore there will be an even increased number of cars on the road
Thomas Hook	Yes	Rainham is running out of green space and the little it has left should be protected. Additionally, the additional traffic this will bring to our already congested roads will exacerbate the problems it causes them while offering no long term solutions for improving them. Finally, this will clearly be the thin end of the wedge, opening up the way fo
Violet Chapman	Yes	
Wendy Arnold	Yes	Impact on the environment and a strain on local resources & amenities.
Rachel Summers	Yes	More houses means more traffic on the roads, patients at the hospital & Drs. We need to remember how important trees are to help filter the air of pollution.
Brian Morley	Yes	To many houses being built with no infrastructure. Also taking away our green lands.
Andrew Mota	Yes	this area already suffers from over development congestion and lack of space to live in peace. this destruction of valuable growing productive land must stop.
Richard Byscuth	Yes	
Mal Haslett	Yes	
Debbie Ashton	Yes	
Wendy Byscuth	Yes	
Susan Miles	Yes	Yet another new development in this area would be detrimental.
Abigail Teague	Yes	Given the proposal includes both a secondary and primary school, there will be even more traffic despite the reduction in homes than the previously declared unsuitable proposal.
Madeline Mota	Yes	The infrastructure in the Rainham area cannot withstand constant building of lots and lots of houses without supporting the community
James Knight	Yes	Constant reduce of green space in medway
Janet Norton	Yes	
Maxine Perrin	Yes	Too much traffic on the road already

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Vikki Williams	Yes
Richard Perin	Yes Too much traffic
Shaun Smith	Yes
Nel Jessup	Yes
Hayley Hillery	Yes
David Hillery	Yes
Jan Deeley	Yes
Melanie Franklin	Yes Welfare of existing Medway residents - air quality - impact on local roads with increased traffic, health and safety elements - pollution- floods
Hayley Sym	Yes
Marion Ahmedrai	Yes
Colin Deeley	Yes Our lovely Kent countryside is rapidly becoming a concrete jungle with inappropriate facilities i.e. schools, doctors surgeries and hospitals. Lower Rainham has and is saturated with new housing developments, infrastructure in terms of roads, doctors and hospitals are broken. We have noticed air quality is worse abd by removing all the trees and additional traffic it will be even worse. Enough! No more! The local road infrastructure is already overloaded and there are already more houses already being built. There is another house estate being built on orchards that border Medway and Swale councils.
Susan Williams	Yes The local hospital cannot cope with current demands. There is already pollution from the increased traffic from current building projects - lorries, sewage treatment vehicles and increased vehicle volume. We need to keep our orchards to protect our air quality.
Anne Cooper	Yes
Callum Payne	Yes The fact that we are having to defend this agricultural land again despite already saying no in 2021 is a disgrace and completely undermines the community and democracy. This is clear proof that you do not have the peoples interest at heart. No is No.
Martin Wilson	Yes When I lived in Gillingham years ago I used to visit it
Chris Sheehan	Yes Too many people locally and road really busy hospital can not cope.
Cole Hewer	Yes No additional comment
Terry O'Regan	Yes My main concerns are: 1) the hugely negative impact on air quality of destroying a large number of trees that remove a vast quantity of CO2 from the air and replacing them with residential properties that introduce a net-negative affect on air quality and environment. 2) Traffic congestion on local roads in the Rainham area has worsened Terry O'Regan.
Miriam Noble	Yes Overloading an already full infrastructure and destroying a lung of countryside.
Irene Kinslow	Yes
Elizabeth Ann Pell	Yes Established orchards are excellent sites for biodiversity and this rural area does not have the infrastructure for the proposed development.
Kate Bearup	Yes Loss of prime agricultural land. Local infrastructure and services would be unable to support this development considering the development that has already or is imminently waiting approval
Stephen Westcott	Yes Why is the situation different now than before
Natalie Westcott	Yes
Norman Burkett	Yes Having lived in Rainham for 50 years the development that is taking place at the moment is outrageous, I now have to plan any journeys by car taking in the time of day and the time of my appointment, I use the lower road and it can be horrendous at times,the council made a right mess with the bottom of station road, the way things are going is a disgrace.
Robert Poynter	Yes
Ella Poynter	Yes We simply do not have the infrastructure and personally I don't think people want to be queuing to simply get out of their houses permanently!
Victoria Gray	Yes This proposed development has significant environmental impacts. Considering the amount of green field sites that have been built on recently in order to make space for new housing estates, the council should recognise that continuing to build new housing estates in this fashion is unsustainable. Adding yet another estate damages the
Jake Burton	Yes
James Lewis	Yes I have previously objected to the the development of the same land. Please refer to thy document. It is all the same.
Rosanne Paine	Yes There is not sufficiently wide roads to cope with the volume of traffic that this will bring and there is no way the roads can be widened air quality is already very poor due to high volume of traffic that is often stationary and this would just add to that. There are no proper plans to provide hospital/identist/real/gp provision and saying that a sc
Becky McDonald	Yes Road safety would be an issue as there are no pavements, something that has been allowed to happen at the other end of the lower road so increasing the likelihood of accidents happening as cars speed along there too fast Rainham is overloaded with traffic, sewerage dumping from infrastructure overload, collapsing water pipes, gas leaks due to infrastructure pressure and low fresh water supply due to increased housing pressure. There is far too much building going on already in the area and not enough amenities to cater for it.
Rukhsana Rabbani	Yes As much as the promise of a school, health facilities and play area is lovely, we've had these promises before and a change in development plans prohibited that mid building. We also do not have the staff to fill a school or go to fill a surgery. This is why they are all closing. We need to fill the empty health facilities we already have with me
Martin Jarrett	Yes The Roads and Railway services will not be able to cope with this development. Every school, doctors and our hospital are running at over 100%. I am waiting weeks (not days) to get appointments.
Mahmudul Hasan	Yes I would ask that you as planners would live with such a development in your area. Green space is good time here for any number of reasons, not just to wait in the queue to be developed.
Andrew Fish	Yes
Kieran Crayford	Yes Several simple factors here, but falls on deaf ears when money is involved, as that's all we care for. Not wildlife, local infrastructure, traffic management. I could go on but pointless.
Lesley Roast	Yes Save the countryside too many houses in that area
Karen Reed	Yes
Patricia Smith	Yes There is not enough services to cope with more people,The hospitals Doctors schools and public services buses which are very much needed. We need the Natural wildlife to maintain enough oxygen on the environment.
Sarah Roast	Yes
Julie Norman	Yes
Penny Adley	Yes Destroying the beautiful green space is criminal
Jacqueline Cheesema	Yes
David Cheeseman	Yes
Trude McLaren	Yes As a tenant of Bloor Lane allotments, I object to the close proximity of the development to the green space provided for allotments. I strongly suggest that in the event of the development being approved, that the existing conifer trees dividing the orchards and the allotments are to remain for everyone's benefit of privacy.
Sarah Linbourne	Yes The surrounding area has too many houses and not enough green agricultural land- therefore we need to save the 126 acres. Rainham is slowly being turned into a huge horrible housing estate at the hands of the council who do not care about the green spaces. Both the A2 and Lower Rainham Rd cannot cope now with the volume of traffic because of the ridiculous amount of new homes built in the last 8+ years. No infrastructures outside of the developments made. Come to Rainham when either the A2 or Lower Rainham Rd is closed fully or partially to see the massive impact it has on us locals
Donna Oliver	Yes From the houses built in Otterham Kay Lane, Station Rd plus more as we speak, Lower Road x2 already and next development by Stonebond, up to Yokosuka Way is a like a mini Motorway which doesn't have any more exits to get off. We are being suckled up in the middle of these developments and this proposal is going to flood our Roads. My Road has turned into a by pass for when Road works are going on and it certainly wasn't the case 18 years ago when I moved here. We are being encased in more pollution, no green space and just utter misery from the volume of people, cars and broken promises from the council.
Susanna Harris	Yes
Lisa Rutland	Yes Nothing has changed since the last failed application, the same issues remain.
Sam Marston	Yes
Roseanna Neall	Yes I MOVED HERE IN 1983 SINCE THEN I HAVE BEEN SURROUNDED BY UGLY HOMES DIRT DUST AND BUILDERS LORRIES. DO NOT PUT ANY MORE HERE. WE CANNOT BREATHE!!!!
Andrew Linbourne	Yes Preserve our green agricultural land please at all cost. Try to save our area please
Ashley Jennings	Yes The roads cannot handle this extra load. The A2 and Lower Road already struggle and cause current residents huge delays.
Angela Hayward	Yes We need more houses but the one country lane won't cope, it doesn't cope at the moment.
Jeanette Blanshard	Yes I visit a friend who lives in original cottages and area has had mass development already in this area why do you feel need to continue when it means putting small businesses (pet supplies) out of business or relocation. Need to consider original residents when they purchased properties there was nothing but green land now as far as you
Jennifer White	Yes The current infrastructure cannot cope with the amount of traffic as it is. Our hospital and GP services are stretched to the max. More housing will only add to the burden
Anna Adimitrova	Yes
Tony Trowel	Yes To go ahead would be against the reasons the planning inspectorate refused previously. So what's changed?
Lorette Green	Yes
Terri Munn	Yes
Laura Barton	Yes The infrastructure isn't in place for this development to go ahead. In the Medway Towns, we need a new Hospital, Doctors Surgeries, Schools and such like. The Roads are constantly congested and the Bus Service is terrible.
Susan Searle & Malcol	Yes The area just cannot cope with any more housing. Loss of agricultural land. Roads are in adequate to carry the cars in use now. Not enough doctors, and the local hospital just is unable to deal with the numbers. Waiting lists and bed availability is dreadful.
Barry Scoons	Yes
Christine Elsmore	Yes Volume of traffic on Lower Rainham Road, destruction of habitat for birds, ongoing problems with infrastructure.
Sylvia Scoons	Yes Not enough infrastructure
Russell Milford	Yes
Jo Harris	Yes
Brigitte Ward	Yes Total lack of infrastructure in the area, roads are not fit for purpose, it's already a problem with all the new builds on lower Rainham Rd! Green spaces are being demolished and valuable orchards. There seems to be no protection whatsoever. It does not comply with the governments green agenda! There's only one hospital in Medway. Getting GP appointments is also a lottery. The increase in population is not sustainable!!
Thomas Currie	Yes
Samuel Harris	Yes

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Simon Browse	Yes	
Hollie Westcott	Yes	
Pauline Grieve	Yes	
Lisa Mansurlu	Yes	Rainham is bursting with traffic already
Gary Ward	Yes	
Philip Davies	Yes	
Peter Conn	Yes	
Peter Wareing	Yes	Green belts/spaces are vital resources that cannot be generated easily by greening up another area. Destroy an ecosystem, even one that is relatively new, as an orchard, and you reduce biodiversity in the area, reducing places for animals to live in or pass through.
Corine Burkin	Yes	
Terry jenkins	Yes	Lower rainham road is not wide enough to accommodate the extra traffic with all the other houses built
Matthew Sargison	Yes	
Jean Jenkins	Yes	Traffic is a nightmare now but with all these extra cars it will be a nightmare. Also the impact on the environment will be catastrophic to animals, insects and humans. We need to preserve our countryside for future generations. The proposed development would substantially increase the volume of traffic on Lower Rainham Road, a route that is already under significant strain. The road is narrow in parts, often congested, and ill-suited to handle the level of traffic that would be generated by such a large-scale residential or mixed-use development. The isolated nature of the development would mean that any increase in traffic would be concentrated on a single route, leading to further congestion and delays. In order to service the proposed development, substantial groundworks and infrastructure installations would be required. This would likely include digging and installation of water, sewerage, gas, electricity, and broadband services causing temporary or prolonged closures of parts of Lower Rainham Road and adjacent routes.
Clinton Lyon	Yes	
Steven J Crisp	Yes	We need farmland for our food security NOT houses!
Dan Kent Smith	Yes	
Paul Whitaker	Yes	There is not enough infrastructure in place to accommodate this you will remove a public park from residence.
Paul Williams	Yes	
William Whitaker	Yes	Break the norm and say no!
Stephen Gates	Yes	
Gemma Chapman	Yes	The local infrastructure cannot cope coupled with the destruction of valuable agricultural land that is perfectly viable for food production rather than increasing imports of poor quality higher cost food from abroad
Shelia Jasper	Yes	We've said no 4 years ago. We're still saying no! No means No!!
Paul Wyatt	Yes	
Maria Bolan	Yes	The medway towns cannot take any more housing, the infrastructure is nowhere near sufficient now in terms of utilities, NHS services (all), schooling and road infrastructure. This development is just the greed of one family who have already ruined Twade and Sheppey.
Karen Pittcock	Yes	The continued lack of investment in social infrastructure, educational infrastructure, health infrastructure and transport infrastructure, as well as a lack of consideration for the impact to current local residents and services, is a significant concern that remains unanswered or mitigated in the last 10 years, and especially through any of the previous planning applications.
Gianfranco Trepanti	Yes	Our previous MP promised us significant upgrades and we are yet to see these come to fruition.
Marion Frost	Yes	
Charlotte Goddard	Yes	
James Lester	Yes	
Lisa Dorney	Yes	
Susan Harrison	Yes	The surrounding road infrastructure is unable to cope with the current new builds that have taken place without further adding to the issue with this development
Kelli Boner	Yes	
Danny Beecham	Yes	
Patricia Butler	Yes	This flies in the face of the previous decision at the Public Inquiry and nothing has changed since then. The area's infrastructure is insufficient for this new proposed development in all respects. New developments on this scale are strangling Rainham and the Medway area and there are insufficient resources to accommodate them.
Lucy Peacock	Yes	
Julie Whiting	Yes	I'd be interested to learn what the Council plans to do to improve the road infrastructure around this area - there are five housing developments in progress within walking distance of my home. This will be the 6th. Our tiny streets cannot cope with hundreds and hundreds more cars. Build somewhere else please.
Amy Campbell Barr	Yes	The Lower Rainham road is already saturated with traffic
Cheyenne Allman	Yes	I strongly object to this proposal. It would cause the permanent loss of high-quality, productive agricultural land, worsen existing traffic congestion north of the railway line, and introduce severe impacts on the local road network. The development would also harm the historic character of the area, damaging both visual and non-visual links to the surrounding countryside.
Dave Neil	Yes	
Angela Wallace	Yes	There is no way that the B2004 or Beechings Way, or Watling Street can take the amount of traffic generated by this development. Plus, as far as the provision of a GP's surgery, where will the GPs come from? Nobody wants to be a GP these days, and the Healthy Living Centre in Rainham has been advertising for staff for some time. These plans are a disaster.
Cindy Neil	Yes	
Carly Williamson	Yes	
Ellie Clarke	Yes	
Barb Martin	Yes	Too many houses being built in this area - the roads can't cope now let alone once all these developments being done on the lower road in Rainham / upchurch
Robert Campbell Barr	Yes	I understand need for houses whcih I believe Lower Rainham has onced in spades. I believe this will not be affordable housing. Not sure we need another school. Doubt it will be ever built along with the nursing home. There has been enough housing built in the sea recently and I cannot see how anything has improved since the last app.
Richard Goodhand	Yes	
Philip Harrison	Yes	Traffic from Lower Rainham Rd is already a nightmare, Bevingrave Lane is always blocked and people then drive dangerously in to Watling Ave, at speed and on the wrong side of the bollards and often up the pavement.
Isabel Spragin	Yes	
Danielle Grant	Yes	The infrastructure can not cope as it currently is, let alone adding more houses. We need hospitals, doctors surgeries not housing for non locals.
Andrew Potter	Yes	Loss of green land, more traffic and still no new hospital in medway
Trudy Boulton	Yes	I object to the destruction of the orchards. The lower rainham rd is already busy enough and can't cope with any more traffic
Hayley Wolfe	Yes	No consideration to the traffic and population of housing this many people. This area is too over populated and no room for further housing or suggestive schools or doctors if that's a consideration.
Dani Branch	Yes	Destruction of mature thats needed, seriously! Also, roads wont cope, doctors wont cope, hospitals wont cope, schools wont cope. I thought Teyddat was a 'green' area, leave us alone! How are we here again!
Ben Horsfall	Yes	
Jake Payne	Yes	Get away you robbing bastards
Kayleigh Pugh	Yes	The area is over run with new builds. Our roads are gridlock, our hospital is overwhelmed and cannot cope with more residents as it is. We have barely any green space left in Rainham, slowly over the last 10 years more and more houses have been built, and along the way we have lost our lovely Rainham. Please consider the impact this will have on our environment, our infrastructure and to the local residents. We are slowly becoming a concrete jungle.
Suzanne Taylor	Yes	The road can not cope!
Kaylen	Yes	
Susan Nolan	Yes	
Brenda Singleton	Yes	These plans were turned down before in part due to the high quality of the agricultural land this has not changed nor had our need for this land. The plans do not show how the surrounding areas, now often gridlocked if either the A2 or lower road are closed, will cope with additional traffic. There is also no extra provision for hospital car parks or additional parking spaces for the surrounding area.
Harry Marp	Yes	
David Burnstead	Yes	Having lived in Rainham for over sixty years I am absolutely devastated to see the continued destruction of the beautiful orchards and the countryside. The orchards in question produce an abundance of apples each year which contributes to feeding the nation, the destruction of these orchards is a threat to our food security. It also concerns me that the infrastructure in and around Rainham just cannot cope with the increase in population and the increase in vehicles that will be in the area. Medway hospital is at breaking point, local GP's are struggling with the existing population and you can't get a NHS dentist in the area. As it is utility companies in the area are struggling to cope with the increase in demand for services.
Matilda Hales	Yes	
Sarah Bowie	Yes	This area is one of nature's beauty. A great place to walk a dog or get away from the built up areas of Rainham. Destroying this land will ruin history, agriculture and the wildlife in the area, as well as ruin a great walking spot for many.
Anne Bass	Yes	With lots of new building in the area the Lower Rainham Road would not be able to cope with the extra traffic this development would generate also with wars and rumours of wars we need to keep prime agriculture land for our national food security.
Rebecca Waud	Yes	
Clare Shubbs	Yes	
Colin Shubbs	Yes	
David Singleton	Yes	So many green areas have been built on in the surrounding area and we need to keep green corridors for our wildlife and our own wellbeing. The roads in this area will struggle to cope with all of the extra traffic. What provision is made for the NHS and emergency services to cope with the extra rd and that will be placed on them?
Anthony Reas	Yes	Make that land for farming, local produce etc not for more housing which we are getting too many of
Amanda Steer	Yes	
Simon Steer	Yes	
Bailey Banfield	Yes	
Chris Lack	Yes	
Graham Billelt	Yes	There is already significant development in the lower Rainham corridor. This would put unprecedented strain on local infrastructure in water, sewerage etc.
Heidi Beer	Yes	We have too many new estates in the surrounding areas. We need to protect our declining green spaces

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Charlie Pollard	Yes	
Natalie Norridge	Yes	
Debbie Gilbert	Yes	I object to fruit providing orchards being destroyed in order to build yet more housing. Housing that will contribute further to polluting our environment and the destruction of essential wildlife habitats. The local infrastructure is already at breaking point with roads, doctors, hospitals and schools all struggling.
Caitlyn Hayes	Yes	
Christine Landford	Yes	The Lower Rainham Road is already vastly impacted by heavy traffic passing through, and with more planned house building due to start, it will be even more so. The road is simply not built and designed to take this amount of traffic.
Amy Silkstone	Yes	
Marka Cook	Yes	
Pam Hughes	Yes	Lower Rainham Road cannot take anymore traffic and it is impossible to widen it. Also rhs, schools and facilities are well over subscribed already.
Ann Beard	Yes	Over built area, no infrastructure, area constantly grid locked. Hospital at breaking point already without stretching it further. Houses will not be affordable for locals. Air pollution will be high. Valuable agricultural green space will be lost, exactly like the near by pear orchard, heartbreaking to see. The council are turning Rainham into a concrete jungle.
John Cartwright	Yes	
Sharon Baker	Yes	
Kulvinder Panesar	Yes	
Andrew Olsen	Yes	The road in question cannot sustain the current level of housing with water and gas constantly having to be upgraded, this development will increase this insustainability.
Debbie Flack	Yes	We need agricultural land to be used for growing food for the Uk rather than importing in products we could grow ourselves. Makes environmental sense. Also need more hospitals etc for growing population before we add more houses to this area. Once the agricultural land is built on it will be lost forever.
David Thompson	Yes	
Alex Cramlington	Yes	There is a lack of infrastructure to support current residents, yet alone thousands more. The increase in traffic, waste, pollution and noise will be both impactful on current residents and also incredibly damaging to our wonderful wildlife. While plans say they will include schools etc, these rarely come to fruition and local schools are already at capacity.
Sharon Daniels	Yes	
Jenny Orxley	Yes	This is a disgrace, I always vote labour and was so excited when Labour took over leadership of Medway (especially with what's currently happening at KCC) so this is incredibly disappointing and worrying. Rainham is changing beyond recognition and to build on these precious orchards when there are so many brown field sites doesn't make sense.
Olivia Pearce	Yes	
Barbara Meade	Yes	
Barry Meade	Yes	
Olivia Hetterley	Yes	
Dorina Lee	Yes	If we lose agricultural land, we lose the ability to feed ourselves. We lose the ability to work and provide for our families and our community.
Caren Lewis	Yes	This proposal cannot be allowed to go ahead. The area is already over populated, with little investment into the infrastructure, roads, schools, doctors etc. Should this go ahead, there will be further loss of greenbelt land, increased congestion and traffic issues, further pollution etc.
Ross Bate	Yes	
Jeff Doust	Yes	
Jackie Pearson	Yes	There has been significant development already along lower rainham road. The road is narrow in parts and there is not the infrastructure in the area to cope with yet more traffic. Traffic levels and congestion have increased in rainham as a result of the increased population in recent years. Local public services which are already under pressure.
Caroline Rogers	Yes	Traffic jams in that area are already appalling during certain times of day.
Caroline Monger	Yes	Medway is struggling enough with Doctors, Hospitals.Roads can't cope with more traffic and also roads are suffering with potholes not being fixed properly. Un-affordable homes for locals big houses to bring people from out of the area.No jobs we need a hospital more than anything. Taking all our beautiful green space for the money makers ?????
Rechel Birch	Yes	
Mark Tester	Yes	The infrastructure. Too busy, the roads can not take anymore traffic. Concerned about the sewage, is this going into the river medway or is it going into cess pits.
Mollie Hetterley	Yes	
Sean Hetterley	Yes	It was rejected for various reasons, all still stand!
Elaine Hetterley	Yes	Traffic can and will never cope
Tracy Collins	Yes	
Paul Hetterley	Yes	Infrastructure still can not cope with current levels
Finley Leah	Yes	
Denisa King	Yes	
Ben Hetterley	Yes	
Sally Hetterley	Yes	I strongly object to the inclusion of Pump Lane Orchards in the Local Plan for development. This land represents an irreplaceable natural, historical, and agricultural asset that has already been fiercely protected by the community in 2021, and for very good reason. The orchards sit on Best & Most Versatile (BMV) agricultural soil, supporting biodiversity and providing a unique local food source. Allowing development here would destroy not only the landscape and the unique character of the area but also disrupt the delicate ecological balance. The site's isolation north of the railway line would worsen already severe traffic congestion, adding further strain to the local infrastructure. Additionally, the proposed development would erode the green belt and contribute to climate change through increased carbon emissions. The objections raised in 2021 remain fully valid and even more pressing now. The cost to the community—both environmentally and financially—would be immense and irreversible. I urge the Planning Inspectorate to uphold the protection of Pump Lane Orchards by removing this land from the Local Plan, preserving it for future generations.
Haley Harks	Yes	Destruction to wildlife Noise pollution Air pollution Causing more problems to already congested roads. Over crowding The orchards are Gillingham's lungs. We need them to breathe. The roads can't take any more people using them, the local hospitals and GP's are already at capacity. Absolutely not
Denise Graves	Yes	
Alison Peters	Yes	
Jack O'Sullivan	Yes	
Sarah Ormell	Yes	So, I live approximately 2 miles up the hill from the sewage station, but when it rains heavily the sewers back up and start to over flow into our garden, how on earth is the current sewage system going to cope with all the extra houses etc? It's not! It can't cope with what we already have. I took a group of kids kelping off the strand a couple of weeks ago and there was brown ssum on top of the water where they had obviously had a recent dump of sewage!!
Gary Coppell	Yes	Also I had to go with my Mother in law to The Medway Hospital, so had to wait in Aand E for nearly 2 days - where is the new hospital going? Infrastructure especially road network in lower Rainham cannot cope already and the proposed development will result in more gridlocked traffic. Destruction of so many trees and increased road traffic will have a major impact on air quality
Michael Marshall	Yes	The plan was not made available by Medway Council for inspection and feedback for sufficient time to meet the statutory requirements Pollution Increased road congestion Overcrowding
Sally Green	Yes	Sad to think your planning to build houses on an orchard.Traffic will be horrendous for people that live in pump lane.
Myra McKenna	Yes	This is valuable agricultural land. Look at some of these disused petrol stations that Angela Rayner said would be used for development. There is no infrastructure ie doctor's etc to accommodate all these extra people. Can't get a doctor as it is
Emma O'Leary	Yes	
Bery Stiles	Yes	This development will make traffic even worse on the lower road running through Lower Halstow. I worked in this orchards when I was young and my children were at primary school and would hate to see it all put to housing x
Stuart Mason	Yes	v4VZB9HW
Matthew O'Leary	Yes	
Pavan Saroya	Yes	
Zoe King	Yes	This development will adversely affect the wildlife and destroy the green buffer zone. It will cause additional traffic and associated pollution. This is agricultural land and should not be built on.
Alan Stratford	Yes	Stop building on land for food
Trevor Daw	Yes	
Karen Hart	Yes	Rainham is becoming too over crowded with new homes. Infrastructure is not there. Prime agricultural land should be protected not destroyed
David Hill	Yes	This orchard, these trees, represent not only a vital connection to our region's historic past but also is an invaluable community asset, especially for those with young children, helping them to understand and appreciate where food comes from and why we must continue to nurture our environment.
Jackie Stead	Yes	I stand by all I said before. Plus Our road has become a nightmare after all the new houses that have built in the recent years. If further housing is built the roads would not cope. Pump Lane is too small for the amount of houses proposed to be built. Lower Rainham Road is already under strain with the amount of traffic.
Chris Pollington	Yes	The railway bridge cannot be extended so again would cause traffic disruption around the surrounding area. AC Gorham is a company that is meant to proud itself on growing food not building houses. I'm concerned about the soundness of the inclusion of this development in the local plan. A previous development at Pump Lane was refused by the Council and upheld by the Secretary of State in 2021. The reasons given for refusal remain unchanged and are still valid. The Council does not address this in the local plan. I'm concerned about the significant harm this development will cause to the character of the area and it's impact on local infrastructure for which no provision has been made.
Jane Cook	Yes	
David Devine	Yes	
Carol Beckett	Yes	
Helen Stockwell	Yes	I understand the need for housing very much, but please see that this is not right for all the reasons identified by the pump lane Steering group
Steve Birkin	Yes	This is a precious place, for wildlife and flora and fauna
Martin Potter	Yes	The proposal covers the same site as the development proposal which was decisively refused by the Planning Inspectorate and Secretary of State in 2021. It would lead to all the same, if not worse, impacts as the 2021 development with regards to landscape, loss of productive orchards and BMV Grade 1 land, not to mention the mayhem
Rebecca Meade	Yes	Grade 1 and 2 land is important for the country as food security becomes an issue, so the council should not be allowed to build on this type of land. There is a huge environmental impact of removing the trees with the additional pollution of the building works and massive increase in traffic in the area. The road infrastructure struggles to
Joel Turner	Yes	
Michal Hart	Yes	Should use brownfield sites first, plus need better roads, currently Lower Rainham Road is frequently jammed, Station Road & intersects are too small & 5 Sisters public house up to A2 is frequently jammed at the top before Leigh Academy to A2.
Michael Knight	Yes	Too many existing new builds have made roads impassible. Lack of infrastructure to support more house being built. Rainham is already becoming overcrowded and building more houses will just to the issues at our local hospital and issues on the roads especially when all of the roads are closed because of ongoing work. Also we need orchards to maintain the scenic beauty of our countryside. M

Name	Do you reaffirm your objection to the destruction	Please use this space to make and additional comments you would like the Planning Inspectorate to take into consideration? (please ensure you comment)
Gina Eastwood	Yes	Common sense
Jackie Sargison	Yes	Local roads and infrastructure cannot cope at the moment. More development will be a disaster
Donna Sullivan	Yes	We need green space, not more houses that put pressure on our roads, utilities & one hospital!
Paul Eastwood	Yes	Common sense, lack of infrastructure
J Knight	Yes	Increased traffic on local roads will exacerbate the congestion we are already experiencing
Joan knight	Yes	Increased traffic congestion on the local roads
Sam Mitchell	Yes	
Diane McKenzie	Yes	We do not need anymore new estates in Rainham, you only have to look at an over established Chatham, through the years, I lived in lordwood in the seventies when Chatham was thriving, now look at it, so many estates built round the estate I lived on, woodland slowly disappearing, I cannot even stand to walk down Chatham high street,
Philip Blackwell	Yes	All comments previously stated around infrastructure, erosion of countryside, air pollution and employment. Rainham is already ridiculously congested and at times the local area comes to a standstill, which has gone from occasionally to regular occurrence. What use to be a 5 minute journey can be upwards to an hour. Our community has
Christopher Cooke	Yes	To this 126 acre site there is only one possible access route and that is the Lower Rainham Road which is already over congested, I am part of the Rainham Community orchard who over the last 18 months have planted over 200 fruit trees in an attempt to keep orchards going. Unlike Goothams who are another developer cashing in on the
		As a resident of the Medway Towns for more than 40 years, with 3 adult children who have struggled to find their own accommodation, I have no problem with the principle that we need more housing in Medway and across the Country. The present proposals by Equique Developments for Lower Rainham are better than previously by Rapleys in 2020/21 but any approval will leave the way open for further ad hoc developments in future and doubtless there will be immense pressure to develop the remaining land between it and Lower Teydall Lane to follow. However, the basic infrastructural issues of transport, together with water supply/sewage treatment, must be addressed before commencing any construction of new buildings in this area.
		Road access is severely restricted by the railway to the south with just the one narrow bridge under the railway on Pump Lane, about which the proposed Pump Lane Park in the Movement Strategy can do nothing, and will lead to prolonged traffic jams both in Pump Lane and at the mini-roundabout on Beechings Way, with likely knock-on of
		Road traffic congestion is also likely to become more commonplace along Beechings Way toward Teydall, which has traffic calming speed bumps as well as several more mini-roundabouts, and beyond to the roundabout on the A289 to Way Yokosuka Way. In the other direction towards the river, the B204 Lower Rainham Road is already constricted with a single lane traffic light controlled section between Lower Roots Lane and Pump Lane resulting in standing traffic frequently backing up towards Beregravene Lane in peak periods.
		Flows of traffic exiting the new development in either direction will lead to further build-ups or queues of standing vehicles, either in Beregravene Lane at the railway bridge and at the junction with the A2 London Road at the bottom of Maidstone Road, or at the roundabout at the bottom of Yokosuka Way with increased pressure both towards
		I would dispute the Junction Capacity Assessment by P&J Frischman as presented in the Equique Developments proposals and would like to know more about the methodology, and time-period of its application, which led to this assessment.
		At the consultation meeting I attended recently, one of Equique Developments representatives, when challenged about this, said there was plenty of capacity and people could walk or catch a bus to Rainham and rather than drive, whilst commuters could use the trains, but admitted when pressed that he doesn't come from or live in the area.
		A walk from Pump Lane along the present public footpath, across Lower Bloss Lane, past the community woodland to Beregravene Lane and then along Tuford Road to the station takes at least 20 minutes in either direction.
		Trains are already overcrowded from Rainham at peak times and a conversation with recently retired signaller who covered this area was unequivocal about there being no more capacity for additional trains without major investment in Network Rail's signalling systems.
Mark Fakingham	Yes	Another, obviously more senior, representative from Equique Developments at the consultation meeting was dismissive about concerns being expressed about infrastructure, saying they always come up with any new proposed development, that these are the responsibility of the Local Authority and there was nothing his company could do. Similarly, he said that concerns about water supplies and sewage treatment are the responsibility of Southern Water who are statutorily obliged to ensure there is sufficient provision so, again, nothing to do with the developers.
		The 4th paragraph of the Project Background panel states: "Crucially, the development is seeking to deliver 'lost infrastructure' that has not been delivered as a result of the ad hoc residential developments' amounting to around 1,200 dwellings in the last 10 years. Whilst this is no one site's fault, the lack of investment, coordinated through
		I suggest it is disingenuous to say "We only say this can be achieved is by bringing forward development of a mixed-use - such as this".
		This individual sees his responsibility is to build decent homes for people to live in, but surely the time has more than come for some strategically "joined-up thinking", not just with this development but any and all of them in Medway, and beyond?
		Within the proposals, under, Community Provision, adjacent to the proposed new 2-form entry primary school, there is mention of Temporary Accommodation which, unfortunately, could present some potential safeguarding issues that could be lessened if it was in a different location, not so close to the schools or play/park areas.
		There has been a tendency for similarly planned "Community Provision" to be scaled back when it actually comes to be built, both in size and types of provision promised.
		School buildings are frequently not big enough in the first instance and grounds that may have just about been sufficient for the intended numbers of pupils attending those schools are lost to additional, often "temporary", buildings.
		Developers should consider what sorts of schools they would like their own children/grandchildren to attend, or speak with serving teachers, rather than relying on OFE blueprints drawn up by bureaucrats who probably rarely go near a state school.
		I suggest that any overall planning consent should put a legal onus on the developers to deliver their original promises for such provision, rather than allowing them to "wriggle off the hook" if their financial objectives start looking doubtful.
Amanda Gilbert	Yes	We have no green fields left around Rainham
Anna Marie Matthews	Yes	The area is not able to cope with more houses! The hospital is struggling, not enough primary school places, not enough GPs- sort out the infrastructure to support the growth first
Jonathan Matthews	Yes	Enough of any green land has been ruined
Gloria Savoy Volter	Yes	Use brownfield sites, there's enough of them!!
Sharon Fitzjohn	Yes	
Suzanne Griffiths	Yes	
Lynne Knight	Yes	Last winter Medway hospital was on its knees, patients in corridors as there were no beds. This hospital covers a wide area where more building is taking place, this proposed building project will be the nail in its coffin, why should current residents lives be put at risk from lack of efficient hospital services. Another field on the lower Rainham
Rachael Dyke	Yes	Traffic will be increased to an unreasonable level.
Jack O'Neal	Yes	
Neal Short	Yes	The area is of natural beauty, and home to many wildlife families which would be replaced by foxes, rats, and god awful houses. Lower bloss as well as pump lane will be turned into rat runs already over capacity for their construction.
Laura Martin	Yes	
Steve Nathan	Yes	In addition to the points above: (1) there is limited school, GP and shopping infrastructure in the proposed area. I was not able to find a secondary school place for my youngest within 75 mins travelling time (2) this combined with limited road infrastructure will cause severe traffic problems across the proposed area (3) this is one of the few
Perry Nathan	Yes	I live in the local area, and the lands makes it both feel comfortable, and keeps the air cleaner than other areas.
Carol Rones	Yes	the local facilities and infrastructure cannot cope with more houses, the local hospital is at bursting point already. Lower rainham road is already at a standstill most mornings and this will only get worse with more housing.
Laura wheal	Yes	The Council & Developers are earmarking prime agricultural land for building when there are more suitable brown field sites or old developments that need to be put to housing first. These green sites are too valuable to loose. We need them for our environment and food self sufficiency.
Colin Elliott	Yes	
Sian Evans	Yes	
Andrew Potter	Yes	
David Smith	Yes	Dreadful idea objections continue.
Mick Holding	Yes	The orchards are home to a vast variety of wildlife and insects that are vital to the local environment, the devastation of this would have a catastrophic impact to these animals and neighbouring habitats.
Louise Smith	Yes	The roads cannot support that volume of traffic currently. Hospital already can't cope. Not enough doctors etc. I see the issues daily as I drive around as a delivery driver. Too many people in a small space. We already have issues with water and utilities in that area with the lower road feeling like it is permanently dug up. This pushes everyth
Christine Holding	Yes	
		The infrastructure is bursting at the seams at present this will just add to the traffic issues. The developer may have an our in the sky everyone will walk or cycle but that's not reality. The buses all seem to go via Chatham so as a Tainham resident you can't even get to Strood for example without two buses.
Lisa twigg	Yes	also Medway hospital is one of the worse performing in the country with long outpatients lists.
Marie Mill	Yes	This is not to mention the loss of good agricultural land for orchards. Rainham has just become a concrete jungle that is also a Car park.
Matthew clare	Yes	The community objected to this four years ago which the inspectorate agreed this site shouldn't be built on due to her findings so why now should this go ahead now.
	Yes	Subject to more farmland being converted to land for building residential housing.
Mimette	Yes	The area does not have enough space for every 100 patient as it is. Medway is very overcrowded with poor infrastructure by southern water and road connections.
Kathleen Sheppard	Yes	Where is all new flood going to be grown, not locally that's for sure. Build in all the brownfield sites that are still available.
Paul Brooks	Yes	Please consider the implications to our hospitals, Doctors, Dentists etc as well as the vast wildlife. The horrendous amount of extra traffic which these country roads will not be able to cope with, I implore you to take all this into consideration and reject these plans. Nothing has changed since the last application, the roads, services, wildlife
Robert Paylor	Yes	No infrastructure, we're all struggling to get hospital appointments and green land should be used for agriculture not pavements
Sue Harwood	Yes	Should not even be in local plan
Lesley Markham	Yes	
Anne Christmas	Yes	Destroying beautiful fruit trees to build yet more housing in an area that will not cope with the extra traffic is absolutely ridiculous and so wrong
David Gilbert	Yes	
Pauline Lake	Yes	
Arnie Stringer	Yes	
Debbie DARTNELL	Yes	
David Powell	Yes	Too much good land being sold for short term material gain

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

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="Michael"/>	<input type="text"/>
Last Name	<input type="text" value="Pearce"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Campaign Leader"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="STHP"/>	<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="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" value="REDACTED"/>

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	ALL (See Repts)	Policy	ALL (See Repts)	Policies Map	ALL (See Repts)
-----------	-----------------	--------	-----------------	--------------	-----------------

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

See representations:

STHP Representation - Proposed Submission Documents
STHP Representation - Procedural and Compliance Documents

(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.

See representation:

STHP - Representation - Proposed Submission Documents
STHP - Representation - Procedural and Compliance Documents

(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)

☒

TICK

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:

The Save The Hoo Peninsula Campaign (STHP) would like to participate in the hearing sessions and we will have professional representation. We are currently awaiting the details of the person concerned.

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>



Representation

Scrutinising the Procedural and Compliance Documents

In response to

Medway Council's

Regulation 19

Medway Local Plan 2041

***Proposed Submission Draft
and Supporting Documents***

June 2025

Sunday 10th August 2025

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About The Save The Hoo Peninsula Campaign (STHP)

Save The Hoo Peninsula (STHP) is an independent campaign established to protect the area from unsustainable residential and employment development. The Hoo Peninsula is a strong rural community with productive fertile agricultural land, valued landscapes, rich heritage, and internationally and nationally important habitats, supporting bio-diverse wildlife. The Hoo Peninsula is part of the proposed East Coast Wetlands designation to become a UNESCO Natural World Heritage Site.

The following four categories must be at the heart of Medway Council's new Local Plan.

- 1. Conserving and enhancing the natural environment**
 - 2. Supporting a prosperous rural economy**
 - 2. Meeting the challenge of climate change, flooding and coastal change**
 - 3. Conserving and enhancing the historic environment**
-

Chapter 1 – Executive Summary

This representation scrutinises the legal compliance, soundness, and fulfilment of the Duty to Cooperate of the Medway Council Regulation 19 Draft Local Plan (June 2025), focusing exclusively on the following supporting documents:

- **Local Development Scheme 2024–2026**
- **Regulation 18 (2024) Consultation Summary**
- **Duty to Cooperate Statement (June 2025)**
- **Agreed Statement of Common Ground with Kent County Council (July 2024)**
- **Initial Proposed Composite Statement of Common Ground with Strategic Bodies (June 2025)**
- **Initial Proposed Statement of Common Ground with Thurrock Council (June 2025)**
- **Diversity Impact Assessment (June 2025)**

The analysis is benchmarked against:

- The **National Planning Policy Framework (December 2024)**, with paragraph references taken only from this version.
- The **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)**, which is part of the statutory development plan.

Summary of Findings

1. Legal Non-Compliance

The Draft Local Plan fails to comply with statutory requirements in the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012, and the legal obligations under the Equality Act 2010.

- **Local Development Scheme (LDS)** – The timetable in the LDS does not reflect realistic or deliverable milestones when measured against NPPF paragraph 16(b) on being “aspirational but deliverable.” The evidence base cited in the LDS omits key technical studies (e.g., up-to-date transport modelling for the Hoo Peninsula) required to support cross-boundary infrastructure decisions, contrary to NPPF paragraph 32.
- **Regulation 18 Consultation Summary** – The process set out fails to meet NPPF paragraph 16(c) requirements for “early, proportionate and effective engagement,” particularly in how responses from the Hoo Peninsula community were handled. There is inadequate evidence that concerns raised under the adopted Hoo St Werburgh & Chattenden Neighbourhood Plan policies HOO4, HOO8, and HOO11 were addressed.
- **Duty to Cooperate Statement & SoCGs** – The Duty to Cooperate Statement and Statements of Common Ground fail to demonstrate “effective and on-going” cooperation under NPPF paragraph 28. Key cross-boundary environmental and transport constraints (notably cumulative impacts on the Hoo Peninsula) remain unresolved, and many matters are merely listed as “under discussion” without agreement, which does not meet statutory requirements at the point of submission.

2. Soundness Failures

The plan does not meet the NPPF paragraph 36 soundness tests (“positively prepared,” “justified,” “effective,” and “consistent with national policy”).

- **Positively Prepared** – The evidence base for housing and infrastructure provision fails to integrate the capacity limits of the Hoo Peninsula as set out in the Neighbourhood Plan’s infrastructure priorities (section 9), resulting in over-allocation of development in an area already acknowledged in the Local Plan’s evidence base as having severe infrastructure constraints.
- **Justified** – Alternatives that avoid disproportionate environmental harm to the Hoo Peninsula (per NPPF paragraph 11(b)(i)) have not been robustly considered.
- **Effective** – The lack of signed final Statements of Common Ground and unresolved “under discussion” items on strategic matters shows there is no clear mechanism for implementation.
- **Consistent with National Policy** – The plan’s proposed allocations conflict with NPPF paragraph 20(d) requirements for conserving and enhancing the natural, built, and historic environment, particularly with regard to Special Protection Areas and the WWII heritage assets protected under HOO7 of the Neighbourhood Plan.

3. Duty to Cooperate Failure

The Duty to Cooperate is not met:

- Significant strategic matters (including waste management, minerals supply, transport impacts, and flood risk) are recorded as “under discussion” at Regulation 19 stage, indicating no final agreements have been secured as required by NPPF paragraph 28.
- There is inadequate evidence of proactive engagement with Thurrock Council and Kent County Council on cumulative cross-boundary impacts of strategic development proposals affecting the Hoo Peninsula.
- The Regulation 18 Consultation Summary does not show that community-derived strategic issues raised in the Neighbourhood Plan were adequately incorporated into joint-working discussions.

4. Equality and Inclusion Deficiencies

The Diversity Impact Assessment identifies potential adverse impacts but does not set out mitigation measures proportionate to the scale of change proposed. This is inconsistent with the Public Sector Equality Duty under section 149 of the Equality Act 2010 and NPPF paragraph 8(b), which requires planning to foster healthy and inclusive communities.

Overall Conclusion

The Medway Council Regulation 19 Draft Local Plan is:

- **Not legally compliant** – Failing statutory consultation, evidence base, and equality duties.
- **Not sound** – Failing multiple NPPF paragraph 36 tests.
- **Not compliant with the Duty to Cooperate** – Strategic cross-boundary issues remain unresolved at submission stage.

This representation therefore concludes that the plan cannot proceed to adoption in its current form and requires fundamental revision, including:

- A realistic LDS timetable aligned with a complete and robust evidence base.
- Re-consultation on a revised Regulation 18 stage addressing unresolved issues.
- Finalised and signed Statements of Common Ground with all relevant bodies, resolving “under discussion” matters.
- Full integration of the Hoo St Werburgh & Chattenden Neighbourhood Plan’s policies and infrastructure priorities into strategic decision-making.

We will present the case in full across the following chapters:

Chapter 1: Executive Summary

Chapter 2: Local Development Scheme (LDS)

Chapter 3: Regulation 18 (2024) Consultation Summary

Chapter 4: Duty to Cooperate Statement

Chapter 5: Agreed Statement of Common Ground with Kent County Council

Chapter 6: Initial Proposed Composite Statement of Common Ground with Strategic Bodies

Chapter 7: Initial Proposed Statement of Common Ground with Thurrock Council

Chapter 8: Diversity Impact Assessment (June 2025)

Chapter 9: Overall Conclusions and Formal Requests to the Inspector

Chapter 2 – Local Development Scheme (LDS)

2.1 Introduction

The Local Development Scheme (LDS) sets out the timetable and procedural framework for the preparation of the Medway Council Local Plan. Section 15 of the Planning and Compulsory Purchase Act 2004 requires that a local planning authority prepare, maintain, and publish an LDS, which must be kept up to date. The NPPF at paragraph 16(b) requires that plans be “aspirational but deliverable,” and paragraph 32 requires that the preparation and review of plans “be informed by relevant and up-to-date evidence.” The LDS is therefore not a procedural formality; it is the statutory programme that underpins the legal and practical deliverability of the Local Plan.

2.2 Legal Compliance Assessment

2.2.1 Unrealistic and Undeliverable Timetable

The LDS sets out a timetable from 2024 to 2026 for the preparation of the Medway Council Local Plan (period 2025–2041), indicating:

- Regulation 18 consultations in 2023 and 2024 (completed),
- Regulation 19 pre-submission consultation in June 2025,
- Submission for examination in late 2025,
- Adoption in 2026.

However, this timetable fails the statutory requirement for an LDS to be **realistic**:

- As of Regulation 19 publication, **key Statements of Common Ground remain unsigned or in “under discussion” status**, contrary to NPPF paragraph 28 which requires agreements to be “prepared and maintained” to demonstrate effective joint working **at submission**.
- The LDS assumes no further Regulation 18 stage is necessary, despite the Regulation 18 (2024) Consultation Summary showing substantial unresolved public objections to housing numbers, infrastructure capacity, and environmental impacts — issues directly affecting the plan’s ability to meet the NPPF paragraph 36 soundness tests.

2.2.2 Evidence Base Deficiencies

Paragraph 31 of the NPPF requires that the preparation and review of plans be “informed by relevant and up-to-date evidence.” The LDS claims the evidence base is comprehensive, but the following are missing or incomplete:

- **Updated transport modelling for the Hoo Peninsula** to reflect cumulative growth impacts and compliance with Neighbourhood Plan policy HOO11 (Sustainable Transport and Active Travel).
- **Comprehensive infrastructure delivery plan** integrating cross-boundary agreements with Kent County Council and Thurrock Council on waste, minerals, and transport.
- **Updated environmental capacity studies** assessing Special Protection Area impacts, as required under NPPF paragraphs 187 to 195.

2.3 Soundness Assessment

2.3.1 Not Positively Prepared

The LDS’s forward programme does not provide for addressing objectively assessed development needs “so far as consistent with policies in the Framework” (NPPF paragraph 36(a)). It forecloses further community engagement on alternative growth strategies, despite Regulation 18 consultation feedback showing broad opposition to overdevelopment of the Hoo Peninsula without infrastructure upgrades.

2.3.2 Not Justified

The LDS timetable is driven by an adoption target rather than a robust testing of reasonable alternatives. No allowance is made for iterative review should the Inspector find substantial evidence or legal gaps — contrary to NPPF paragraph 36(b) requiring an “appropriate strategy, taking into account reasonable alternatives.”

2.3.3 Not Effective

The LDS does not allow sufficient time for completion and agreement of all Statements of Common Ground, undermining the plan’s ability to be delivered over the plan period. The absence of signed SoCGs at Regulation 19 stage is a known risk to soundness at examination.

2.3.4 Not Consistent with National Policy

NPPF paragraph 15 requires that Local Plans “provide a positive vision for the future of each area” and paragraph 20(b) requires making “sufficient provision” for infrastructure. The LDS timetable fails to sequence infrastructure delivery evidence before finalising spatial allocations, creating a high risk of allocations that conflict with the infrastructure-first approach.

2.4 Duty to Cooperate Compliance

The LDS does not demonstrate how or when Medway Council will finalise its cross-boundary agreements before submission. Instead, it presents an accelerated timetable that appears incompatible with:

- **NPPF paragraph 27**, which requires Statements of Common Ground to document progress in addressing cross-boundary matters.
- **NPPF paragraph 28**, which requires effective and ongoing joint working to be demonstrated “at the time plans are submitted for examination.”

The LDS fails to integrate the timelines of Kent County Council’s Minerals and Waste Local Plan update or Thurrock Council’s Local Plan timetable, risking misalignment of cross-boundary infrastructure planning.

2.5 Conflict with Hoo St Werburgh & Chattenden Neighbourhood Plan

The LDS ignores the statutory status of the Hoo St Werburgh & Chattenden Neighbourhood Plan (adopted November 2024), which forms part of the development plan. The Neighbourhood Plan’s infrastructure priorities (section 9) and environmental protection policies (HOO8, HOO9, HOO10) require sequencing development with infrastructure and environmental mitigation, yet the LDS timetable allows for no further review to align the Local Plan with these requirements.

2.6 Conclusion

The LDS is not legally compliant because it:

- Does not reflect a realistic, evidence-based timetable (section 15, PCPA 2004).
- Omits key evidence required under NPPF paragraph 31.
- Lacks provision for securing and finalising Statements of Common Ground before submission (NPPF paragraph 28).
- Fails to integrate the adopted Hoo St Werburgh & Chattenden Neighbourhood Plan.

It is unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy (NPPF paragraph 36). It also undermines the Duty to Cooperate by failing to align with neighbouring authorities’ plan-making processes.

Chapter 3 – Regulation 18 (2024) Consultation Summary

3.1 Introduction

The Regulation 18 (2024) Consultation Summary reports on the second stage of consultation on the emerging Medway Council Local Plan 2041, held between 15 July and 8 September 2024. It claims compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and Medway Council’s Statement of Community Involvement (SCI) (May 2024).

Under NPPF paragraph 16(c), plans must be “shaped by early, proportionate and effective engagement” with communities and stakeholders. Paragraph 32 requires that plans be informed by consultation feedback and up-to-date evidence. The Hoo St Werburgh & Chattenden Neighbourhood Plan (adopted November 2024), which was at referendum stage during this consultation, set clear infrastructure, environmental, and design priorities for the Hoo Peninsula that should have been fully integrated into the emerging Local Plan.

3.2 Legal Compliance Assessment

3.2.1 SCI Compliance

The Consultation Summary asserts that engagement followed the SCI, but significant issues suggest otherwise:

- **Insufficient targeted engagement** with Hoo Peninsula communities despite the area being proposed for major housing allocations. NPPF paragraph 16(c) requires proportionate engagement; yet the main recorded events were generic exhibitions and workshops, not dedicated sessions addressing the scale of development proposed for the Peninsula and its infrastructure constraints.
- Failure to evidence **how specific Neighbourhood Plan policy concerns (HOO4 housing mix, HOO8 environment, HOO11 transport) were addressed** before advancing to Regulation 19. The report lists these as issues “raised” but does not show resolution or modification to allocations.

3.2.2 Town and Country Planning (Local Planning) Regulations 2012

Regulation 18 requires local planning authorities to invite representations on the “content of the plan” and “what it should contain.” While 2,400+ comments were recorded, the report treats these primarily as thematic summaries without transparent audit trails showing how they influenced draft policy wording or site allocations. This undermines the requirement for consultation to inform plan preparation rather than merely record objections.

3.3 Soundness Assessment

3.3.1 Not Positively Prepared

The consultation process did not seek to resolve fundamental constraints on the Hoo Peninsula before progressing to Regulation 19. NPPF paragraph 36(a) requires plans to meet development needs “so far as consistent with the policies in this Framework.” By not addressing strong community evidence of infrastructure deficits (schools, healthcare, roads) already noted in the Neighbourhood Plan, the plan moved forward with allocations that cannot realistically be delivered sustainably.

3.3.2 Not Justified

The Consultation Summary shows no serious testing of **reasonable alternatives** that would reduce the disproportionate environmental and infrastructure burden on the Hoo Peninsula. This conflicts with NPPF paragraph 36(b) and paragraph 11(b)(i), which require considering alternatives that avoid significant adverse environmental impacts.

3.3.3 Not Effective

The report does not demonstrate that unresolved infrastructure concerns from the Regulation 18 consultation were fed into cross-boundary cooperation mechanisms. Issues such as SPA protection (NPPF paragraph 181) and strategic road impacts remain unresolved in Statements of Common Ground, meaning there is no clear delivery pathway for the Local Plan's spatial strategy.

3.3.4 Not Consistent with National Policy

NPPF paragraph 20(b) requires making “sufficient provision” for infrastructure, while paragraph 20(d) requires conserving and enhancing the natural, built, and historic environment. The consultation responses show overwhelming local concern about failure to protect SPA habitats, air quality (Neighbourhood Plan policy HOO10), and heritage assets (HOO7), but these issues were not resolved before allocations were confirmed.

3.4 Duty to Cooperate Compliance

The Consultation Summary's Section 4 on the Duty to Cooperate claims the process met legal requirements but offers no evidence that Regulation 18 feedback was actively used to strengthen cross-boundary agreements.

Key failures:

- No indication that Natural England's concerns over SPA and Ramsar site impacts were resolved before progressing to Regulation 19.
- No integration of feedback into the waste and minerals agreements with Kent County Council or Thurrock Council, despite the obvious cross-boundary implications for transport and capacity.

This contravenes NPPF paragraph 28, which requires “effective and on-going joint working” to be demonstrated at submission.

3.5 Conflict with Hoo St Werburgh & Chattenden Neighbourhood Plan

The consultation occurred while the Neighbourhood Plan was nearing adoption. Key adopted policies now in force were clearly emerging at that time, including:

- **HOO4** – requiring housing growth and mix to meet local needs.
- **HOO8–HOO10** – requiring protection of landscape, local green space, and air quality.
- **HOO11** – mandating sustainable transport and active travel infrastructure to be in place for new developments.

The Consultation Summary offers no indication that these emerging policies were given material weight in shaping allocations, contrary to NPPF paragraph 13, which requires neighbourhood plans to support and shape the delivery of strategic policies.

3.6 Conclusion

The Regulation 18 (2024) Consultation Summary is **not legally compliant** because:

- It does not show evidence of proportionate engagement for the most affected communities.

- It fails to demonstrate how consultation responses influenced the plan’s content as required by Regulation 18.

It is **unsound** because:

- It is not positively prepared (ignores clear infrastructure/environmental constraints).
- It is not justified (fails to test reasonable alternatives).
- It is not effective (unresolved cross-boundary infrastructure and environmental issues).
- It is not consistent with national policy (fails to secure sufficient infrastructure and protect environmental assets).

It **does not meet the Duty to Cooperate** because it fails to evidence that consultation feedback was integrated into cross-boundary agreements or strategic decision-making.

Chapter 4 – Duty to Cooperate Statement

4.1 Introduction

The Duty to Cooperate (DtC) is a statutory requirement under section 33A of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The NPPF, at paragraphs 27 and 28, makes clear that strategic policy-making authorities **must demonstrate effective and ongoing joint working**, documented in Statements of Common Ground (SoCG), **at the time plans are submitted for examination**.

Medway Council’s Duty to Cooperate Statement (June 2025) claims to demonstrate compliance, but detailed scrutiny reveals serious deficiencies.

4.2 Legal Compliance Assessment

4.2.1 Incomplete and Unresolved Strategic Matters

The DtC Statement outlines 11 strategic matters, including housing, strategic sites, natural environment, flood risk, minerals supply, and waste management. However:

- Many of these remain unresolved at Regulation 19 stage, with the linked SoCGs showing **key topics “under discussion”** rather than agreed.
- NPPF paragraph 28 requires that **agreements be in place** to demonstrate effective cooperation. Ongoing discussions at submission do not meet this standard.

4.2.2 Absence of Signed Final Statements of Common Ground

- The **Initial Proposed Composite SoCG with Strategic Bodies** is unsigned by most parties and lists all matters as “under discussion.”
 - The **Thurrock SoCG** is still a draft.
 - The **Kent County Council SoCG** exists in updated form but does not resolve all cross-boundary waste and minerals supply issues.
- Without signed and finalised agreements, the DtC Statement fails the statutory test at the point of submission.

4.2.3 Failure to Address Cross-Boundary Infrastructure Evidence

The DtC Statement claims ongoing cooperation on strategic road network capacity, air quality, and flood risk, but:

- There is no cross-referenced evidence showing these issues have been quantified or resolved in infrastructure delivery planning.
 - For the Hoo Peninsula, no agreed package exists with Kent County Council or National Highways to mitigate the cumulative impacts of proposed allocations, contrary to NPPF paragraph 20(b) (requiring sufficient provision for infrastructure).
-

4.3 Soundness Assessment

4.3.1 Not Positively Prepared

Under NPPF paragraph 36(a), a plan must meet objectively assessed needs “so far as consistent with policies in the Framework.” Here:

- Housing numbers have been fixed without agreements on cross-boundary infrastructure to accommodate growth.
- The Hoo Peninsula is disproportionately burdened despite known constraints, with no confirmed mitigation agreements.

4.3.2 Not Justified

The DtC Statement offers no evidence that alternative spatial strategies (reducing pressure on the Peninsula) were discussed with neighbouring authorities as part of strategic planning — contrary to paragraph 36(b) and paragraph 11(b)(i).

4.3.3 Not Effective

The absence of signed SoCGs means there is no effective delivery mechanism for many strategic matters (e.g., SPA protection, road network mitigation). This contravenes paragraph 35(c) and would be a critical weakness at examination.

4.3.4 Not Consistent with National Policy

- NPPF paragraph 27 states SoCGs should be prepared and maintained “throughout the plan-making process” and reflect progress in addressing cross-boundary matters.
 - NPPF paragraph 28 requires demonstrating effective and ongoing joint working “at the time plans are submitted for examination.”
This has not been met, as unresolved “under discussion” matters dominate the record.
-

4.4 Duty to Cooperate and the Hoo St Werburgh & Chattenden Neighbourhood Plan

The Neighbourhood Plan’s infrastructure priorities (section 9) require coordinated delivery with Medway Council and infrastructure providers before further housing growth. Yet:

- The DtC Statement does not reference the adopted Neighbourhood Plan at all, failing to demonstrate integration of parish-level strategic priorities into cross-boundary cooperation.

- This omission breaches NPPF paragraph 13, which requires neighbourhood plans to shape and direct development outside of strategic policies.
-

4.5 Conclusion

The Duty to Cooperate Statement is **not legally compliant** because:

- It lacks signed and finalised SoCGs at Regulation 19 stage.
- It fails to resolve strategic matters before submission, contrary to NPPF paragraph 28.
- It omits integration with the adopted Neighbourhood Plan's strategic requirements.

It is **unsound** because:

- It is not positively prepared, justified, or effective.
- It is inconsistent with national policy on the Duty to Cooperate.

This creates a substantial risk that the Local Plan will be found incapable of adoption without significant further joint working and re-consultation.

Chapter 5 – Agreed Statement of Common Ground with Kent County Council

5.1 Introduction

The Agreed Statement of Common Ground (SoCG) with Kent County Council (KCC) is dated July 2024 and is presented as part of the Duty to Cooperate evidence base.

Under **NPPF paragraph 27**, Statements of Common Ground should be prepared and maintained “throughout the plan-making process” and should clearly set out:

- The cross-boundary matters being addressed.
- The progress in cooperating to address them.
- The agreement reached between the parties.

This SoCG covers key strategic matters including minerals and waste management, transport infrastructure, flood risk, and environmental protection.

5.2 Legal Compliance Assessment

5.2.1 Scope and Completeness

While the SoCG is labelled “Agreed,” scrutiny shows that:

- Several strategic matters are acknowledged but **only partially resolved**, with the document referring to ongoing workstreams without final agreement (e.g., transport mitigation packages, minerals safeguarding policies).

- The SoCG does not confirm full alignment between Medway Council’s proposed spatial strategy and KCC’s **Minerals and Waste Local Plan** timetable, contrary to NPPF paragraph 28’s requirement for demonstrating “effective and ongoing” joint working **at submission**.

5.2.2 Minerals and Waste

The SoCG records shared awareness of minerals safeguarding areas and waste capacity issues but:

- Fails to set out **site-specific mitigation** or a joint strategy to address the cumulative impact of housing allocations on minerals safeguarding (particularly on the Hoo Peninsula).
- Does not specify how waste arising from Medway Council’s growth will be managed cross-boundary in line with KCC’s waste capacity forecasts.

5.2.3 Transport

The SoCG acknowledges that the Hoo Peninsula allocations require significant transport infrastructure upgrades, yet:

- No costed or agreed mitigation package is included.
- No timeline for joint delivery with KCC Highways and National Highways is stated. This is a critical omission given NPPF paragraph 20(b)’s requirement for sufficient provision for infrastructure in strategic policies.

5.3 Soundness Assessment

5.3.1 Not Positively Prepared

The SoCG does not show that Medway Council’s growth strategy has been shaped to fully align with KCC’s strategic transport and minerals/waste priorities. Housing numbers have been fixed in the Local Plan without secured delivery agreements for the associated infrastructure.

5.3.2 Not Justified

The spatial allocations — particularly the scale of growth on the Hoo Peninsula — were not demonstrably tested against **reasonable alternatives** that would reduce cross-boundary infrastructure burdens, contrary to NPPF paragraph 36(b) and paragraph 11(b)(i).

5.3.3 Not Effective

An “Agreed” SoCG that still lists unresolved transport and waste matters undermines the effectiveness of the plan. Paragraph 36(c) requires strategic matters to be deliverable over the plan period; unresolved funding and delivery arrangements indicate the opposite.

5.3.4 Not Consistent with National Policy

Without full agreement on minerals safeguarding and waste capacity, the SoCG fails to meet NPPF paragraph 210(c) (which requires safeguarding resources) and paragraph 28 (which requires effective cooperation to be demonstrated at submission).

5.4 Duty to Cooperate and the Hoo St Werburgh & Chattenden Neighbourhood Plan

The Neighbourhood Plan's infrastructure policies (HOO4, HOO8, HOO11) require:

- Early provision of sustainable transport links before further growth.
- Full environmental mitigation for any development impacting designated habitats.
- Local waste and recycling capacity improvements.

The SoCG with KCC makes no reference to the Neighbourhood Plan's adopted policies, despite their statutory status. This omission means the SoCG fails to demonstrate integration of neighbourhood priorities into cross-boundary agreements — contrary to NPPF paragraph 13.

5.5 Conclusion

The Agreed SoCG with KCC is **not legally compliant** because:

- It fails to resolve several strategic matters before Regulation 19 submission.
- It does not integrate with the adopted Neighbourhood Plan's infrastructure requirements.

It is **unsound** because:

- It is not positively prepared (allocations fixed without full infrastructure agreements).
- It is not justified (alternatives not tested in light of cross-boundary constraints).
- It is not effective (key matters still unresolved).
- It is inconsistent with national policy on minerals safeguarding, waste capacity, and infrastructure planning.

It **fails the Duty to Cooperate** test because unresolved matters and omission of neighbourhood priorities show joint working is incomplete and ineffective at the point of submission.

Chapter 6 – Initial Proposed Composite Statement of Common Ground with Strategic Bodies

6.1 Introduction

The Initial Proposed Composite Statement of Common Ground (Composite SoCG) is intended to summarise the collective progress of Medway Council's strategic cooperation with multiple statutory bodies, including:

- Natural England
- Environment Agency
- Historic England
- National Highways
- Homes England
- Neighbouring local authorities (Kent County Council, Gravesham, Tonbridge & Malling, Maidstone, Swale, Thurrock, etc.).

Under **NPPF paragraphs 27 and 28**, this document should demonstrate **effective and ongoing joint working** and show that agreements have been reached on key cross-boundary matters **at the time of submission**.

6.2 Legal Compliance Assessment

6.2.1 Predominance of “Under Discussion” Items

The Composite SoCG table is dominated by entries marked “**under discussion**”, “awaiting evidence,” or “to be agreed.”

- This includes critical strategic matters such as **housing distribution, strategic transport mitigation, SPA and Ramsar site protection, air quality, and flood risk management.**
- NPPF paragraph 28 is explicit: demonstration of effective and ongoing joint working **must occur at submission**, not left open-ended.

6.2.2 Missing Signatures

The Composite SoCG is unsigned by several key strategic bodies. While some authorities have signed bilateral SoCGs (e.g., Kent County Council), the composite form remains a working draft. This is procedurally insufficient for demonstrating compliance with section 33A of the 2004 Act.

6.2.3 Lack of Cross-Referencing to Evidence

The Composite SoCG lists strategic issues but does not link them to agreed evidence bases — contrary to NPPF paragraph 32’s requirement that plan preparation be informed by relevant and up-to-date evidence. For example:

- **Transport impacts on the Hoo Peninsula** are acknowledged but without reference to completed or agreed modelling.
- **SPA mitigation** is “in progress” but without reference to a completed Habitats Regulations Assessment agreed with Natural England.

6.3 Soundness Assessment

6.3.1 Not Positively Prepared

Key strategic constraints are known but unresolved, meaning the plan has been advanced to Regulation 19 without securing agreements that would enable housing and infrastructure delivery.

This is the opposite of the proactive, problem-solving approach envisaged in NPPF paragraph 36(a).

6.3.2 Not Justified

The Composite SoCG does not demonstrate that reasonable alternative growth strategies were discussed with neighbouring authorities to minimise environmental harm (NPPF paragraph 36(b), 11(b)(i)).

For example, there is no recorded discussion on **rebalancing allocations away from the SPA-constrained Hoo Peninsula.**

6.3.3 Not Effective

By its own admission, the Composite SoCG leaves many matters “under discussion,” meaning there is no certainty they will be resolved within the plan period. This undermines deliverability (NPPF paragraph 36(c)).

6.3.4 Not Consistent with National Policy

Failure to secure agreement on SPA protection measures before submission conflicts with NPPF paragraphs 187 to 195.

Failure to finalise cross-boundary transport solutions conflicts with paragraph 20(b) on infrastructure provision.

6.4 Duty to Cooperate and the Hoo St Werburgh & Chattenden Neighbourhood Plan

The Neighbourhood Plan’s policies — particularly:

- **HOO8–HOO10** (landscape and environmental protection, air quality),
- **HOO11** (sustainable transport),
- **HOO4** (housing mix and local need)

— are directly relevant to cross-boundary discussions with statutory bodies like Natural England, National Highways, and the Environment Agency.

However:

- The Composite SoCG makes **no reference** to the Neighbourhood Plan.
- There is no evidence its policies were considered when discussing mitigation measures for SPA impacts or transport capacity.

This omission breaches NPPF paragraph 13’s requirement to integrate neighbourhood plan priorities into strategic plan-making.

6.5 Conclusion

The Initial Proposed Composite Statement of Common Ground is **not legally compliant** because:

- It remains in draft form with missing signatures from key statutory bodies.
- It contains multiple unresolved “under discussion” items at Regulation 19 stage.
- It fails to integrate statutory neighbourhood plan policies into cross-boundary cooperation.

It is **unsound** because:

- It is not positively prepared (advances plan without resolving strategic constraints).
- It is not justified (no evidence of testing reasonable alternatives in light of constraints).
- It is not effective (many issues remain unresolved, undermining delivery).
- It is inconsistent with national policy (conflicts with various NPPF paragraphs listed above).

It **fails the Duty to Cooperate** test, as the necessary evidence of effective and ongoing joint working **at submission** is absent.

Chapter 7 – Initial Proposed Statement of Common Ground with Thurrock Council

7.1 Introduction

This chapter scrutinises the **Initial Proposed Statement of Common Ground between Medway Council and Thurrock Council concerning strategic waste management** (Draft v1.0, 2 June 2025) as part of Medway Council’s Regulation 19 evidence. The document’s own status is explicit: “**Draft**”, focused narrowly on waste, and produced to frame cross-boundary cooperation between the neighbouring unitary/billing authorities.

Assessment is against the **NPPF (December 2024)** — particularly chapter 3 (plan-making) and paragraphs **27–28** on Statements of Common Ground and “effective and ongoing joint working” — and the **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)** where relevant strategic implications arise (transport, air quality, spatial distribution).

7.2 What the Thurrock SoCG says (and doesn’t say)

The draft SoCG:

- Confirms its **scope is waste management only**, not a full-spectrum SoCG covering housing distribution, transport, natural environment or flood risk.
- Cites national policy on DtC and SoCG preparation and recognises the need to plan an **integrated network of waste management facilities** across boundaries, referencing PPG passages on **self-sufficiency and proximity** not equating to every LPA managing all of its own waste.
- Notes the authorities sit in **different regional waste groupings** (SEWPAG for Medway; EEW TAB for Thurrock), implying systematic cross-regional flows and capacity interdependencies.

However, the draft leaves unresolved:

- **No signed, final agreement**; it remains a “**Draft**” (v1.0) with no signatures or dated commitment by both parties.
 - **No quantified baseline and forecast flows** (tonnages by waste stream, origins/destinations) and **no agreed capacity headroom** or contingency for the plan period.
 - **No site-specific or facility-type strategy** (e.g., recycling, residual treatment, hazardous, construction & demolition) and **no delivery/monitoring framework** with triggers and corrective actions.
-

7.3 Legal compliance (DtC)

NPPF paragraph 27 requires SoCGs to set out cross-boundary matters, progress, and agreements; **paragraph 28** requires authorities to “**demonstrate effective and ongoing joint working... at the time plans are submitted for examination.**”

On that test, this SoCG fails because:

1. **Status** – it is expressly **draft** at Regulation 19 stage, with no signatures. There is therefore no agreed position to submit.
2. **Substantive gaps** – the document does not evidence **agreements** on quantum of cross-boundary waste movements, capacity reliance, replacement/expansion needs, or fallback arrangements if either authority’s infrastructure changes.
3. **Breadth** – waste is handled in isolation. Yet the Local Plan’s spatial strategy generates **linked strategic effects** (transport movements, air quality corridors, environmental constraints) that should be **co-signed** with Thurrock where impacts/flows traverse boundaries. The SoCG is silent on those interdependencies.

Conclusion (legal): At submission, Medway Council must show **effective joint working** via **signed SoCGs** covering all relevant strategic matters. This draft, waste-only, unsigned SoCG **does not meet NPPF 27–28** and therefore **fails the DtC legal threshold**.

7.4 Soundness

Under **NPPF paragraph 36**, the plan must be **positively prepared, justified, effective, and consistent with national policy**.

- **Not positively prepared:** The plan's growth generates additional waste arisings and **cross-boundary handling** without an agreed network solution or contingency with Thurrock — contrary to the SoCG's own recognition of economies of scale and regional interdependence.
 - **Not justified:** There is **no evidence** that reasonable alternatives (e.g., redistribution of growth to reduce cross-Thames waste movements; earlier investment in local capacity) were tested with Thurrock as part of the strategy selection.
 - **Not effective:** With **no quantified flows, capacity headroom, delivery timetable, or monitoring triggers**, the plan lacks a credible implementation pathway for waste. That undermines effectiveness across the plan period.
 - **Not consistent with national policy:** NPPF ch. 3 and para 20(b) require sufficient provision for infrastructure in strategic policies; para 28 requires demonstrable joint working. The draft SoCG shows neither **agreement** nor **provisioning detail**.
-

7.5 Linkages ignored: transport, air quality, environment

The SoCG itself references the PPG's acknowledgement of **economies of scale** and **cross-boundary movements**, yet it omits the connected strategic effects: **HGV routing, corridor capacity, and air quality** implications — issues that directly affect the **Hoo Peninsula** and the broader Thames estuary movement patterns. Without a jointly agreed **routing/mitigation** framework (and associated monitoring), the Local Plan fails to evidence integrated strategic planning across administrative boundaries.

This gap cuts across the **Neighbourhood Plan's** policies, notably **HOO10 (Air Quality)** and **HOO11 (Sustainable Transport and Active Travel)**, which require plan-led mitigation and infrastructure sequencing before accommodating additional traffic-generating uses. The Thurrock SoCG contains no cross-reference to these adopted development plan policies, so local strategic priorities have not been embedded in cross-boundary waste planning.

7.6 What would compliance look like? (Remedy)

To reach DtC compliance and soundness, Medway and Thurrock would need to submit a **signed final SoCG** that, at minimum, provides:

- **Baseline and forecast tonnages** by waste stream for Medway Council and Thurrock Council, identifying **net imports/exports** across the boundary over the plan period, with sensitivity testing.
- An agreed **capacity and investment schedule** (by facility type), including contingencies if planned capacity slips or policy changes affect availability.
- A **routing and mitigation framework** addressing **transport corridors and air quality**, aligned with the Neighbourhood Plan (HOO10–HOO11) and the NPPF's infrastructure and environmental requirements.

- A **governance and monitoring protocol** with **triggers** (e.g., % capacity utilisation, facility downtime) and **actions** (e.g., interim contracts, plan review, alternative routing) to maintain network resilience.
-

7.7 Conclusion

The **Initial Proposed SoCG with Thurrock** is **draft, narrow in scope, and lacks quantification, commitments, and sign-off**. It therefore **fails to demonstrate “effective and ongoing joint working” at submission** (NPPF 27–28) and renders the Local Plan **unsound** on the **positively prepared, justified, effective, and consistency** tests (NPPF 36). The omission of linkages to **transport and air quality** conflicts with adopted **Neighbourhood Plan** policies and NPPF infrastructure requirements. The plan **cannot proceed to adoption** until a **signed, detailed, and monitorable SoCG** with Thurrock is in place.

Chapter 8 – Diversity Impact Assessment (June 2025)

8.1 Introduction

This chapter assesses whether Medway Council’s **Diversity Impact Assessment (DIA)** for the Regulation 19 Draft Local Plan (June 2025) meets the **Public Sector Equality Duty (PSED)** and supports plan **soundness** under the **NPPF (December 2024)**. The DIA describes the Local Plan as a “*statutory plan [that] aims to balance the need for housing, jobs and services with environmental protection and sustainable development.*” We test the DIA’s scope, evidence, mitigation, and monitoring against NPPF requirements (notably paragraphs 8(b), 16(c), 20(b), and 31) and the **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)**, including policies **HOO4–HOO5, HOO8–HOO11**.

8.2 Legal context: PSED and the NPPF

- **PSED (s149 Equality Act 2010)** requires due regard to eliminating discrimination, advancing equality of opportunity, and fostering good relations **when** exercising functions — including plan-making. This means **robust, front-loaded assessment**, targeted mitigation, and **monitorable** outcomes for protected groups.
 - **NPPF (Dec 2024)**:
 - **para 8(b)**: planning should *support strong, vibrant and healthy communities* — implying inclusive access to homes, services, and open space.
 - **para 16(c)**: plans must be *shaped by early, proportionate and effective engagement* with communities and statutory bodies.
 - **para 20(b)**: strategic policies must make *sufficient provision* for infrastructure (health, education, transport), critical for equality outcomes.
 - **para 31**: plans should be *informed by relevant and up-to-date evidence* — including equality evidence that is specific and granular.
-

8.3 What the DIA contains

The DIA cites reliance on the 2025 **Local Housing Needs Assessment, Viability Assessment, Sustainability Appraisal, Infrastructure Delivery Plan, Gypsy & Traveller Accommodation Assessment, and Retail Needs Update (2025)** as its evidence base. It records high-level effects by protected characteristic (table with “Adverse impact”, “Advance equality”, “Foster good relations”), e.g., positive/neutral indications for **age, disability, pregnancy/maternity, race, and care experience**.

Observation: while the table format is clear, the DIA largely **summarises** expected benefits and **does not translate** them into **spatially targeted measures**, triggers, or delivery mechanisms.

8.4 Material deficiencies in the DIA

(1) Lack of granular, spatial evidence and distributional analysis

The DIA does not disaggregate impacts by **place**, despite the plan’s heavy concentration of growth and movement pressures on the **Hoo Peninsula**. Without ward/LSOA-level analysis (e.g., health access, school capacity, accessible transport, air quality), the DIA cannot demonstrate *due regard* where need is greatest. This cuts across NPPF **para 31** (up-to-date, targeted evidence) and **para 20(b)** (infrastructure provision).

(2) No equality appraisal of reasonable alternatives

The plan’s selection of a strategy with significant Hoo Peninsula implications is not accompanied by a DIA comparison of **reasonable alternatives** (e.g., rebalance growth away from SPA-constrained/under-served areas). This is crucial to both **PSED** and the **soundness** test of being **justified** (NPPF **para 36(b)**) and consistent with **para 11(b)(i)** (avoid significant environmental harm where possible).

(3) Missing group-specific mitigation and delivery mechanisms

Although the DIA lists positive intentions (e.g., supported housing, accessibility standards, health inequalities), it **does not**:

- Quantify **accessible housing outputs** (HOO5) by tenure/type,
- Tie **active travel and bus access** to phased triggers for new development (HOO11),
- Specify **air-quality mitigations** for vulnerable groups along key corridors (HOO10),
- Secure **local green space** and landscape protections that support health equity (HOO8–HOO9),

This lack of **SMART** (Specific, Measurable, Achievable, Relevant, Time-bound) mitigation conflicts with NPPF **para 20(b)** and undermines effectiveness.

(4) No monitoring framework with triggers and corrective actions

The DIA proposes **no indicators** (e.g., % M4(2)/M4(3) homes, median bus headways to primary care, school places per 1,000 children, NO₂/PM exceedances by site, step-free accessibility to stops/stations, affordable completions by bedroom mix and income decile). Without indicators, **there is no lawful assurance** that equalities risks will be managed during delivery. This fails NPPF **para 32** and the PSED’s ongoing duty.

(5) Weak integration with the Neighbourhood Plan (adopted November 2024)

The DIA does not show how it implements the **Neighbourhood Plan’s** priorities — **HOO4** (housing mix), **HOO5** (standards), **HOO8–HOO11** (environment, air quality, sustainable transport) — despite those being **development plan** policies. That omission conflicts with NPPF **para 14** (neighbourhood plans should shape and direct development outside strategic policies).

8.5 Consequences for legal compliance and soundness

- **PSED risk:** Without place-specific analysis, targeted mitigations, and monitoring, the authority has **not shown due regard** to equality impacts where harm is likely concentrated (e.g., households without cars, disabled people, low-income groups exposed to air-quality corridors). This is a **legal compliance** vulnerability.
- **Unsoundness:**
 - **Not positively prepared** (NPPF para 36(a)): equality needs and infrastructure for vulnerable groups are not demonstrably met.
 - **Not justified** (NPPF para 36(b)): no equality-led comparison of alternatives.
 - **Not effective** (NPPF para 36(c)): no delivery/monitoring framework linking DIA mitigations to plan triggers.
 - **Not consistent with national policy** (NPPF para 8(b), para 20(b), para 32).

8.6 Remedies required to achieve compliance

To rectify the DIA and underpin a legally compliant, sound plan, the Council should, **before submission**:

1. **Undertake a distributional equality analysis** at ward/LSOA level for housing, transport access, health, schools, open space, and air quality — especially on the **Hoo Peninsula**. Link findings to allocations and infrastructure phasing.
2. **Re-appraise reasonable alternatives** through an equality lens (who benefits/loses, where, and by how much), explicitly including options that **reduce exposure** of vulnerable groups to air-quality/transport externalities.
3. **Set binding, quantified mitigations**, including:
 - Minimum % of **M4(2)/M4(3)** homes; **NDSS** compliance; family-sized affordable homes consistent with **HOO4–HOO5**.
 - **Active travel/bus service triggers** keyed to occupations of dwellings (**HOO11**).
 - **Air-quality safeguards** (no net increase in **NO₂/PM** along sensitive corridors; construction emissions controls) aligned to **HOO10**.
 - **Local Green Space/landscape** protections (**HOO8–HOO9**) with accessibility standards for children/older and disabled people.
4. **Publish a monitoring & escalation framework**: indicators, baselines, annual targets, trigger points, and corrective actions (e.g., pause allocations, require additional mitigation funding) to satisfy **NPPF para 32** and the **PSED**'s ongoing nature.
5. **Integrate DIA outputs** into Statements of Common Ground and the Infrastructure Delivery Plan — so cross-boundary infrastructure (e.g., bus priority, health estate, waste facilities) addresses identified equality gaps.

8.7 Conclusion

The DIA is **insufficient** to demonstrate **PSED compliance** and does not provide the **evidence or mechanisms** needed for a plan that is **positively prepared, justified, effective, or consistent with national policy**. Without spatially targeted analysis, quantified mitigations, and a monitoring/escalation regime — aligned with the **Neighbourhood Plan** and the **NPPF** — the Local Plan remains **not legally compliant** and **unsound** on equality grounds.

Chapter 9 – Overall Conclusions and Formal Requests to the Inspector

9.1 Synthesis of failures (legal compliance, soundness, Duty to Cooperate)

Drawing together the evidence examined in Chapters 2–8, the Regulation 19 Draft Local Plan is incapable of lawful submission or adoption on three fronts:

(A) Legal non-compliance

1. **Local Development Scheme (LDS)** – The LDS programme is not realistic or evidence-led; it advances to Regulation 19 without completing the cross-boundary agreements and infrastructure evidence it itself relies upon. The LDS does not provide a credible route to a complete evidence base before submission.
2. **Regulation 18 consultation** – While volume of representations is recorded, there is no transparent audit trail showing how key issues (Hoo Peninsula infrastructure, SPA/air quality, alternatives) informed policy wording and allocations. That is consultation **about** a plan, not consultation **that shapes** the plan.
3. **Duty to Cooperate (DtC) evidence** – At Regulation 19, the record is dominated by **unsigned** or “**under discussion**” documents:
 - Duty to Cooperate Statement (a “living” document with unresolved strategic matters).
 - Initial Proposed Composite SoCG with Strategic Bodies (unsigned; all key matters “under discussion”).
 - Thurrock SoCG (explicitly **Draft v1.0**, 2 June 2025).
 - KCC “Agreed” SoCG (July 2024) which still leaves core transport, waste and minerals issues to ongoing processes rather than settled agreement.
4. **Public Sector Equality Duty (PSED)** – The Diversity Impact Assessment (June 2025) is high level, lacks distributional analysis, alternatives testing, quantified mitigations and a monitoring/escalation regime; this does not demonstrate **due regard** to equality impacts in plan-making.

(B) Unsoundness (NPPF para 36)

The plan fails all four tests:

- **Not positively prepared** – Growth is allocated without secured infrastructure solutions, particularly on/through the Hoo Peninsula.
- **Not justified** – There is no robust testing of **reasonable alternatives** that would reduce disproportionate environmental/transport burdens and equalities harms.
- **Not effective** – Delivery depends on strategic agreements, modelling and mitigation that are not in place and not scheduled realistically.
- **Not consistent with national policy** – The plan does not demonstrate “sufficient provision” for infrastructure (NPPF ch. 3/para 20(b)), or effective joint working with signed SoCGs (para 27–28), or an equality-competent evidence base (para 32), and does not secure protections for internationally designated habitats in a way compatible with paras 187 to 195.

(C) Duty to Cooperate failure (NPPF paras 27–28)

At submission, authorities must “**demonstrate effective and ongoing joint working**” via Statements of Common Ground that document progress **and agreement** on strategic matters. The Composite SoCG is unsigned and marks all key topics as “**Under discussion**”; the Thurrock SoCG is **draft**; the KCC SoCG does not resolve minerals/waste/transport implementation to a signed, timed programme; the DtC Statement itself acknowledges continuing evolution. This is not the standard required **at the point of submission**.

9.2 Conflicts with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)

The Neighbourhood Plan forms part of the development plan (adopted November 2024) and contains policies that are directly engaged by the Local Plan’s strategy, including **HOO4 (Housing Growth and Mix)**, **HOO5 (Housing Standards)**, **HOO8–HOO9 (Landscape and Local Green Space)**, **HOO10 (Air Quality)**, and **HOO11 (Sustainable Transport and Active Travel)**. The Regulation 19 evidence base (LDS, Reg 18 Summary, DtC Statement and SoCGs, DIA) does not demonstrate integration of these policies in the choice of spatial strategy, infrastructure sequencing, environmental safeguards or equality mitigations.

9.3 Schedule of key NPPF provisions engaged (December 2024)

For the avoidance of doubt, this representation relies **only** on the December 2024 NPPF:

- **para 11(b)(i)** – consider alternatives that avoid significant adverse environmental impacts.
 - **para 13** – neighbourhood plans should shape and direct development outside strategic policies.
 - **para 16(c)** – early, proportionate and effective engagement.
 - **para 20(b)** – strategic policies to make **sufficient provision** for infrastructure.
 - **para 27–28** – **Statements of Common Ground** and **effective, ongoing joint working** at submission.
 - **para 32** – plans informed by **relevant and up-to-date evidence**.
 - **para 36 (tests of soundness)** – positively prepared, justified, effective, consistent with national policy.
 - **paras 187 to 195** – protecting internationally designated habitats (SPAs/Ramsar).
 - **para 223(c)** – safeguarding mineral resources and infrastructure.
-

9.4 Formal requests to the Inspector

Given the evidential gaps and statutory defects identified, we respectfully request the Inspector to:

1. **Record a failure of the Duty to Cooperate** (Planning and Compulsory Purchase Act 2004, s33A) because Medway Council has **not demonstrated** “effective and ongoing joint working” **at submission**, as required by **NPPF para 27–28**, evidenced by:
 - The **unsigned** Initial Composite SoCG with strategic bodies.
 - The **draft** SoCG with Thurrock (v1.0, 02.06.25).
 - The KCC SoCG’s failure to secure a complete, timed minerals/waste/transport delivery framework.
 - The DtC Statement’s reliance on ongoing actions rather than concluded agreements.
2. **Find the plan not legally compliant** because:

- The **LDS** is not a realistic, evidence-led programme for completing pre-submission requirements.
- The **Regulation 18 consultation** failed to show how representations shaped policy/allocations.
- The **Diversity Impact Assessment** does not demonstrate PSED compliance.

3. Find the plan unsound under NPPF para 36 for being:

- **Not positively prepared** (no secured infrastructure solutions; equality impacts not addressed).
- **Not justified** (reasonable alternatives not robustly tested, including rebalancing away from the most constrained/impact-sensitive locations).
- **Not effective** (absence of signed SoCGs, delivery/monitoring frameworks).
- **Not consistent with national policy** (para 20(b), para 27–28, para 32, para 187 to 195).

9.5 Steps capable of remedy (pre-submission or through withdrawal and re-consultation)

If Medway Council wishes to remedy the defects, the minimum steps would be:

Duty to Cooperate (pre-submission)

- Secure **signed** SoCGs covering all strategic matters with: Kent CC, Thurrock, Gravesham, Maidstone, Tonbridge & Malling, Swale, Natural England, Environment Agency, Historic England, National Highways — each with **agreed evidence baselines, mitigation packages, timetables, funding, and monitoring triggers**.
- Publish updated **DtC Statement** linking each strategic matter to the relevant SoCG commitments (not “under discussion”).

Evidence and alternatives

- Complete and publish **transport modelling** and **SPA/air-quality assessments** for the Hoo Peninsula and cross-boundary corridors, with Natural England/National Highways agreement. Then **re-test reasonable alternatives** in light of that evidence (NPPF para 11(b)(i), para 32).
- Reconcile the spatial strategy with the **Neighbourhood Plan** (HOO4–HOO11) and demonstrate explicit policy alignment.

PSED and monitoring

- Re-issue a **Diversity Impact Assessment** with ward/LSOA-level distributional analysis; quantified mitigations (e.g., M4(2)/M4(3), NDSS, affordable mix), **phased active-travel and bus triggers**, air-quality safeguards, and a **monitoring/escalation framework** with clear triggers and corrective actions (NPPF para 8(b), para 20(b), para 32).

Programme management

- Publish a **revised LDS** sequencing completion of the above evidence and agreements **before** the next statutory stage, allowing time for **re-consultation** under Regulation 18 on any materially changed strategy.

9.6 Closing position

For the reasons set out in this representation and supported by Medway Council's own submitted documents, the Regulation 19 Draft Local Plan should be found:

- **Not legally compliant;**
- **Not compliant with the Duty to Cooperate** (failure at submission); and
- **Unsound** against NPPF para 36.

We therefore request that the Inspector issues the appropriate findings. Should Medway Council seek to rectify matters, the Council must first complete the sequence of **evidence, equality assessment, cross-boundary agreements, and re-consultation** described above, then proceed with a revised plan that demonstrably accords with the **December 2024 NPPF** and the **Hoo St Werburgh & Chattenden Neighbourhood Plan**.

Thank you for taking the time to read this representation.



SAVE THE HOO PENINSULA

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Representation

Scrutinising the Proposed Submission Documents

In response to

Medway Council's

Regulation 19

Medway Local Plan 2041

Proposed Submission Draft

and Supporting Documents

June 2025

Sunday 10th August 2025

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About The Save The Hoo Peninsula Campaign (STHP)

Save The Hoo Peninsula (STHP) is an independent campaign established to protect the area from unsustainable residential and employment development. The Hoo Peninsula is a strong rural community with productive fertile agricultural land, valued landscapes, rich heritage, and internationally and nationally important habitats, supporting bio-diverse wildlife. The Hoo Peninsula is part of the proposed East Coast Wetlands designation to become a UNESCO Natural World Heritage Site.

The following four categories must be at the heart of Medway Council's new Local Plan.

1. Conserving and enhancing the natural environment
 2. Supporting a prosperous rural economy
 2. Meeting the challenge of climate change, flooding and coastal change
 3. Conserving and enhancing the historic environment
-

Executive Summary

This representation sets out a detailed legal and policy-based objection to Medway Council's **Regulation 19 draft Local Plan (June 2025)**, supported by scrutiny of the accompanying **Habitats Regulations Assessment (HRA)** and **Sustainability Appraisal (SA)**. It also tests compliance against the **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)** and the **National Planning Policy Framework (December 2024)**.

Our conclusion is clear: the draft Local Plan is **not legally compliant**, is **unsound**, and **fails the duty to cooperate**. The proposed allocations on the **Hoo Peninsula** should be removed because they are demonstrably **unsustainable** when measured against the NPPF's policies and the evidence base, particularly in relation to environmental capacity, infrastructure limitations, and statutory habitat protections.

The evidence within the Council's own **HRA** confirms that multiple allocations will have **likely significant effects** on internationally designated habitats, including the **Medway Estuary and Marshes SPA/Ramsar**, **Thames Estuary and Marshes SPA/Ramsar**, and **The Swale SPA/Ramsar**. The SA further acknowledges severe environmental constraints and mitigation uncertainties.

The Neighbourhood Plan for Hoo St Werburgh & Chattenden — part of the statutory development plan — sets out a clear spatial vision and environmental policies that are incompatible with the scale and location of allocations in the Local Plan. This Local Plan therefore conflicts with section 38(6) of the Planning and Compulsory Purchase Act 2004 and fails NPPF paragraph 15, which requires plans to provide a positive vision in line with local aspirations.

Under **NPPF paragraph 11(b)**, where the adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits, the plan must not proceed with such allocations. The cumulative harm from the proposed Hoo Peninsula growth exceeds any reasonable planning benefit, especially when alternative urban-capacity solutions exist.

Furthermore, Medway Council has not demonstrated legal compliance with the Habitats Regulations 2017 in the absence of a complete, final HRA. The Interim HRA explicitly states that “some information... necessary for the completion of the assessment is... outstanding” — a fundamental legal flaw that renders the plan unfit for submission.

We will present the case in full across the following chapters:

Chapter 1: Legal Compliance Failures

Chapter 2: Failure to Meet Tests of Soundness

Chapter 3: Duty to Cooperate Deficiencies

Chapter 4: Conflict with the Hoo St Werburgh & Chattenden Neighbourhood Plan

Chapter 5: Environmental and Habitat Constraints (HRA Evidence)

Chapter 6: Sustainability Appraisal Deficiencies and Alternatives Assessment

Chapter 7: Infrastructure, Transport, and Utilities Capacity

Chapter 8: The Case for Removing Hoo Peninsula Allocations under NPPF 11(b)

Chapter 9: Alternative Strategy — Urban Density First Approach

Chapter 10: Conclusions and Requested Modifications

Chapter 1: Legal Compliance Failures

This chapter demonstrates that the **Medway Council Local Plan 2041 Proposed Submission Draft (June 2025)** is **not legally compliant** because:

1. **The Habitats Regulations Assessment is incomplete and cannot lawfully support submission.**
2. **The plan fails to comply with statutory requirements to align with the adopted Neighbourhood Plan** for Hoo St Werburgh & Chattenden (September 2024).
3. **The Sustainability Appraisal process has not met the requirements of the SEA Regulations** because reasonable alternatives have not been robustly assessed or consulted upon.
4. **The Duty to Cooperate has not been demonstrated** in line with the Planning and Compulsory Purchase Act 2004 and NPPF paragraph 27.
5. **The publication draft does not comply with NPPF paragraph 32** because it is not underpinned by “adequate, up-to-date and relevant evidence” on key matters including infrastructure capacity, environmental limits, and viable alternatives.

1.1 Incomplete Habitats Regulations Assessment (HRA)

The **Interim Habitats Regulations Assessment (June 2025)** states at paragraph E2:

“This is an interim HRA report since some information which is necessary for the completion of the assessment is, at the time of writing, outstanding.”

Under the **Conservation of Habitats and Species Regulations 2017** (Regulation 105), a competent authority **must** complete an Appropriate Assessment before authorising a plan that may have likely significant effects on a European site. NPPF paragraphs 192 to 195 reinforces that plans must be “legally compliant, including with... the Habitats Regulations”.

The screening stage of the HRA (E4–E5) confirms likely significant effects (LSEs) for multiple internationally designated sites, including the **Medway Estuary and Marshes SPA/Ramsar** and the

Thames Estuary and Marshes SPA/Ramsar, on grounds of air quality, hydrology, recreational pressure, and urbanisation. The absence of a completed Appropriate Assessment with fully tested mitigation means the Local Plan cannot legally proceed to submission.

This failure is **fatal** to legal compliance: in *People Over Wind v Coillte Teoranta* (C-323/17), the CJEU held that mitigation cannot be considered at screening and that Appropriate Assessment must be complete before authorisation.

1.2 Conflict with the Hoo St Werburgh & Chattenden Neighbourhood Plan

Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that if a conflict exists between a Local Plan and a Neighbourhood Plan, the most recent plan takes precedence for the area it covers.

The **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)** is the most recent plan for the Hoo Peninsula and forms part of the statutory development plan. Its policies — such as **HOO8: Landscape and Environment** and **HOO10: Air Quality** — set out strong protections for the parish’s landscape, ecological assets, and air quality.

The Local Plan’s proposed scale of growth in **Site Allocations 14.9 (Hoo St Werburgh and Chattenden)** is fundamentally incompatible with these Neighbourhood Plan policies, which resist development that would cause “substantial harm” to the rural landscape or exacerbate air quality exceedances. Proceeding with these allocations breaches NPPF paragraphs 29 to 31, which requires strategic policies to be “consistent with” and “not undermine” neighbourhood planning.

1.3 Deficiencies in the Sustainability Appraisal (SA)

Under the **Environmental Assessment of Plans and Programmes Regulations 2004** (SEA Regulations), the SA must:

- Identify, describe, and evaluate reasonable alternatives (Regulation 12(2)(b));
- Ensure those alternatives are subject to the same level of assessment as the preferred approach;
- Present an objective comparison of their likely effects.

The Regulation 19 SA fails this test in three ways:

1. **Reasonable alternatives have not been robustly assessed.** The SA Volume 2 records that the “preferred approach” was essentially confirmed prior to the final comparative analysis of spatial growth options, meaning alternatives were not developed and tested on equal footing.
2. **Alternatives that could meet housing needs without large-scale Hoo Peninsula allocations** — such as higher densities in urban/suburban Medway Towns — were not given equal assessment despite being realistic options under NPPF paragraphs 124 to 128.
3. **Mitigation is assumed but unproven**, especially in relation to environmental impacts on European sites and infrastructure capacity. SA Volume 1 Table N.7.1 shows residual adverse effects on biodiversity, landscape, and soil quality even after mitigation.

This is contrary to NPPF paragraphs 32 to 34, which requires plans to be “informed by a sustainability appraisal... so that the likely effects... are fully understood.”

1.4 Failure to Demonstrate the Duty to Cooperate

NPPF paragraphs 24 to 28 require strategic policy-making authorities to demonstrate that they have “engaged constructively, actively and on an ongoing basis” with neighbouring authorities and prescribed bodies. Section 33A of the Planning and Compulsory Purchase Act 2004 makes this a **legal duty**.

The Regulation 19 Local Plan lacks clear evidence of formal agreements or joint strategies on matters that are plainly cross-boundary in nature — such as housing delivery, strategic transport, and habitat mitigation. There is no published Statement of Common Ground with key partners addressing the cumulative impact of development on the Thames Estuary and Marshes or on the A228/A289 strategic corridors, both of which have regional implications.

Without such evidence, the Council cannot pass the legal compliance test at examination.

1.5 Inadequate and Out-of-Date Evidence Base

NPPF paragraph 32 requires that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.” Several components of the evidence base are either incomplete or outdated:

- The HRA is interim and incomplete.
- The SA’s alternatives testing is insufficient.
- The Infrastructure Delivery Plan has not demonstrated viable and deliverable solutions to water/foul drainage constraints, education provision, and transport capacity for the scale of growth proposed on the Hoo Peninsula.
- No robust, post-Lower Thames Crossing transport modelling is presented to assess capacity and congestion impacts.

This undermines the ability of the plan to be lawfully submitted, as it cannot be shown that it meets statutory and NPPF requirements for an evidence-led strategy.

Conclusion of Chapter 1:

The draft Local Plan cannot be considered legally compliant because its supporting HRA is incomplete; it conflicts with an adopted Neighbourhood Plan; its SA fails to meet SEA Regulation standards; it does not evidence the Duty to Cooperate; and its evidence base is inadequate. These are not minor procedural errors — they are fundamental statutory failings that would require withdrawal or substantial modification before submission to the Secretary of State.

Chapter 2: Failure to Meet the Tests of Soundness

Paragraph 36 of the **NPPF (December 2024)** states that, to be found sound, a Local Plan must be:

- **Positively prepared** – providing a strategy that, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities;
- **Justified** – an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period and based on effective joint working;

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the NPPF.

This chapter demonstrates that the **Medway Council Local Plan 2041 (Regulation 19, June 2025)** fails all four tests.

2.1 Not Positively Prepared

A positively prepared plan must meet identified development needs while ensuring sustainable patterns of growth (NPPF paragraph 11(a) and paragraph 36).

The Medway Council Local Plan proposes disproportionate growth allocations on the **Hoo Peninsula** (notably Site Allocations 14.9: *Hoo St Werburgh and Chattenden*, and 14.10: *High Halstow*) despite:

- Severe ecological constraints confirmed by the **Habitats Regulations Assessment (HRA)**, which finds *likely significant effects* for multiple internationally protected sites;
- Infrastructure deficits that the **Infrastructure Delivery Plan** has not demonstrated can be resolved within the plan period;
- Existing air quality exceedances in the Four Elms Hill AQMA that will worsen with projected traffic flows, contrary to NPPF paragraphs 196 to 199.

The plan's growth strategy prioritises politically expedient sites rather than those closest to services, transport hubs, and existing urban infrastructure. This does not constitute a “positively prepared” plan — it actively selects locations that are least sustainable under the NPPF's spatial principles.

2.2 Not Justified

A justified plan requires proportionate evidence and a comparative assessment of reasonable alternatives (NPPF paragraph 36(b) and paragraph 33).

The **Sustainability Appraisal (SA)** shows that:

- Higher-density urban-focused options were available but not robustly assessed at the same depth as the chosen strategy;
- Table N.7.1 in SA Volume 1 records **residual significant adverse effects** on biodiversity, landscape, and soils even after mitigation;
- The SA's growth option testing (Volume 2, Section 5) indicates that urban-led approaches score more favourably for accessibility, infrastructure efficiency, and climate change mitigation, yet the plan still opts for a rural-expansion model.

By failing to adopt the option that minimises harm while meeting needs — particularly by not reallocating Hoo Peninsula growth into urban areas — the plan is not the “most appropriate strategy” when considered against reasonable alternatives, as required by NPPF paragraph 36(b).

2.3 Not Effective

Effectiveness requires a deliverable strategy over the plan period, supported by cross-boundary cooperation and realistic infrastructure delivery (NPPF paragraph 36(c) and paragraph 28).

The Hoo Peninsula allocations depend on:

- **Major transport upgrades** to the A228/A289 corridors, yet no fully funded or deliverable scheme is secured;
- **New wastewater treatment capacity**, but the SA acknowledges uncertainty over whether water companies can deliver in time to avoid harm to European sites;
- **Extensive habitat mitigation and monitoring** through Strategic Access Management and Monitoring Strategies (SAMMS), despite the HRA acknowledging that some mitigation measures are undefined or unfunded;
- **Education and healthcare expansions** that are not costed in full in the Infrastructure Delivery Plan.

Without certainty over these dependencies, the plan's key allocations — particularly on the Hoo Peninsula — cannot be considered effective or deliverable.

2.4 Not Consistent with National Policy

Consistency with national policy requires alignment with the NPPF's environmental, transport, and plan-making principles.

The Local Plan conflicts with several core NPPF provisions:

- **Paragraph 11(b)** – where adverse impacts of meeting needs significantly and demonstrably outweigh benefits, the plan should avoid those allocations. The environmental harm identified in the HRA and SA clearly meets this threshold.
- **Paragraphs 15 and 16** – plans should provide a “positive vision” in line with community aspirations. The adopted **Hoo St Werburgh & Chattenden Neighbourhood Plan** opposes the scale and location of proposed growth, making the Local Plan contrary to this requirement.
- **Paragraphs 187 to 195** – plans must protect sites of biodiversity and geological value. The HRA confirms that the proposed growth strategy will likely harm multiple SPAs and Ramsar sites unless mitigation — currently unproven — is fully implemented.
- **Paragraphs 124 and 125** – planning should support development that makes efficient use of land, especially by increasing densities in accessible locations. The plan instead chooses low-density, car-dependent rural allocations far from mainline rail stations.

By pursuing allocations that conflict with both the NPPF and the Neighbourhood Plan, the draft Local Plan is not consistent with national policy.

Conclusion of Chapter 2:

The Medway Council Local Plan fails the tests of soundness under NPPF paragraph 36 because it is not positively prepared, not justified, not effective, and not consistent with national policy. The most sustainable and nationally compliant course is to remove the Hoo Peninsula allocations and redistribute growth into urban and suburban areas with existing infrastructure capacity.

Chapter 3: Duty to Cooperate Deficiencies

3.1 Legislative and NPPF Context

The **duty to cooperate** is a legal test, not a “duty to agree.” Section 33A of the Planning and Compulsory Purchase Act 2004 requires Medway Council to engage “constructively, actively and on an ongoing basis” with neighbouring authorities and other prescribed bodies on strategic cross-boundary matters.

The **NPPF (December 2024)** reinforces this requirement:

- **Paragraph 28** – strategic policy-making authorities should collaborate to ensure that “strategic priorities across local boundaries are properly co-ordinated” and evidenced in a Statement of Common Ground (SoCG).
- **Paragraph 36(a)** – the “positively prepared” soundness test requires that needs be met in full “so far as is consistent with policies in the Framework,” including through cross-boundary arrangements.
- **Paragraph 34** – local plans must be reviewed regularly and kept up-to-date, ensuring that cooperation reflects changing strategic circumstances.

The Local Plan fails to meet these expectations.

3.2 Absence of Comprehensive Statements of Common Ground

The **Medway Council Local Plan 2041 (Regulation 19)** does not publish or reference any comprehensive and up-to-date **Statements of Common Ground** with:

- Kent County Council (highways, education, minerals, waste, and ecology)
- Gravesham Borough Council and Swale Borough Council (cross-boundary housing markets, employment, and environmental impact)
- Natural England (strategic habitat mitigation)
- National Highways (Lower Thames Crossing, SRN impacts)
- Southern Water or South East Water (water supply and wastewater capacity)

This omission is significant because the plan allocates housing in locations — particularly the **Hoo Peninsula** — with impacts that clearly extend beyond Medway Council’s boundaries, such as **traffic flows into Gravesham and Dartford** and **ecological pressures on the Swale SPA**.

NPPF paragraph 28 is explicit: such agreements should be prepared and kept up-to-date to demonstrate constructive, active, and ongoing engagement. In their absence, the Council cannot meet the legal requirement to show that the duty to cooperate has been discharged.

3.3 Cross-Boundary Environmental Constraints Ignored

The **Habitats Regulations Assessment (June 2025)** confirms that proposed allocations will have *likely significant effects* on multiple SPAs and Ramsar sites, including **The Swale SPA/Ramsar** and **Thames Estuary and Marshes SPA/Ramsar**, both of which are shared with neighbouring authorities.

These effects are inherently cross-boundary and require coordinated mitigation strategies. Yet:

- There is no evidence of a jointly prepared Strategic Access Management and Monitoring Strategy (SAMMS) across Medway, Swale, and Gravesham Councils.
- There is no joint visitor management plan for sensitive sites such as **North Kent Marshes** and **Hoo Wetlands Reserve**.

- The HRA itself notes that mitigation measures are partly undefined, unfunded, and reliant on cooperation that has not been formalised in agreements.

Without formal, agreed, cross-boundary strategies, the plan’s habitat mitigation is undeliverable in legal and practical terms.

3.4 Cross-Boundary Transport Impacts Unresolved

The scale of growth on the Hoo Peninsula will increase reliance on the **A228/A289** corridors, with consequential impacts on:

- The **Strategic Road Network (SRN)** managed by National Highways;
- Routes into Gravesham and Dartford, particularly given Lower Thames Crossing-induced traffic redistribution;
- Congestion in Swale Borough through cross-peninsula commuter flows.

Despite these clear cross-boundary impacts, there is no published evidence of **joint transport modelling** with Kent County Council, Gravesham Borough Council, Swale Borough Council, or National Highways. This directly contravenes the requirement in NPPF paragraph 28 for joint working on infrastructure that crosses local authority boundaries.

3.5 Housing Market Area Coordination Lacking

Medway Council sits within overlapping housing market areas, with commuting and migration links into Gravesham, Maidstone, and Swale. Yet there is no SoCG demonstrating:

- Agreement on unmet housing need in neighbouring authorities;
- Coordination on the distribution of housing to minimise environmental harm;
- Joint evidence that the chosen growth distribution is the most sustainable spatial option.

This omission is material because reallocation of Hoo Peninsula growth into the urban/suburban Medway Towns could free up environmental capacity while still meeting regional housing needs — something only achievable through coordinated cross-boundary planning.

3.6 Legal and Soundness Consequences

The absence of up-to-date Statements of Common Ground and the failure to address unresolved cross-boundary matters — environmental, transport, and housing — means:

- **Legally:** The plan fails the **duty to cooperate** test. This is a “cliff-edge” requirement — failure means the Inspector must recommend non-adoption without proceeding to test soundness.
 - **Soundness:** Even if the legal threshold were met, the absence of effective agreements means the plan cannot be “positively prepared” or “effective” under NPPF paragraph 36.
-

Conclusion of Chapter 3:

The Regulation 19 Medway Council Local Plan has not demonstrated compliance with the legal duty to cooperate. Its lack of formalised, up-to-date, and comprehensive cross-boundary agreements on environmental mitigation, transport infrastructure, and housing distribution is both a legal defect and a soundness failure. The Hoo Peninsula allocations are especially problematic in this regard, given their extensive cross-boundary impacts and the absence of coordinated strategies to manage them.

Chapter 4: Conflict with the Hoo St Werburgh & Chattenden Neighbourhood Plan

4.1 Statutory and NPPF Requirements

The **Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024)** was made in November 2024 following a local referendum. It now forms part of the **statutory development plan** for the parish area.

Section 38(6) of the **Planning and Compulsory Purchase Act 2004** states:

“If regard is to be had to the development plan for the purpose of any determination... the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

Section 38(5) adds:

“If to any extent a policy contained in a development plan... conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted.”

Since the Neighbourhood Plan is the most recent statutory plan for the area, any conflict must be resolved in its favour.

The **NPPF (December 2024) paragraph 31** is also clear:

“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan... unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”

This means the Regulation 19 Local Plan must either align with or deliberately supersede the Neighbourhood Plan in a manner that is consistent with national policy and lawful plan-making.

4.2 Spatial Vision Conflict

The **Neighbourhood Plan** sets out a vision to protect the **rural and historic character** of Hoo St Werburgh and Chattenden, to safeguard **Grade 1 agricultural land**, and to preserve **internationally and nationally designated habitats**. Its spatial strategy is explicitly one of **limited, proportionate growth** in locations with existing infrastructure, while protecting landscape, biodiversity, and heritage assets.

By contrast, the **Medway Council Local Plan** allocates large-scale growth in **Site Allocations 14.9 (Hoo St Werburgh and Chattenden)** and **14.10 (High Halstow)**, which would:

- Urbanise large tracts of Grade 1 farmland;
- Generate significant traffic through rural lanes and into the Four Elms Hill AQMA;
- Increase recreational and urbanisation pressures on protected habitats such as the **Medway Estuary and Marshes SPA/Ramsar**.

This is directly at odds with the Neighbourhood Plan's spatial vision.

4.3 Policy Conflicts

Several specific policy conflicts arise between the Local Plan allocations and the Neighbourhood Plan:

Policy HOO1 – Spatial Strategy

The Neighbourhood Plan restricts major development in the open countryside unless it is proven sustainable and compliant with environmental constraints. The Local Plan's allocation of thousands of dwellings outside existing settlement boundaries is inconsistent with this policy.

Policy HOO8 – Landscape and Environment

This policy requires that new development must:

“Avoid the loss of best and most versatile agricultural land, protect and enhance important landscape features, and safeguard designated habitats and biodiversity.”

The Local Plan's allocations will result in permanent loss of **Grade 1 agricultural land** and increase pressure on **SPA/Ramsar sites**, as confirmed in the HRA.

Policy HOO10 – Air Quality

The Neighbourhood Plan mandates that development proposals must not worsen air quality in designated AQMAs, specifically the Four Elms Hill AQMA. The Local Plan's own transport evidence shows that additional traffic from Hoo Peninsula allocations will exacerbate exceedances — contrary to both this policy and NPPF paragraphs 196 to 201.

Policy HOO13 – Community Facilities and Infrastructure

This policy requires that infrastructure must be in place in advance of occupation to support development. The Infrastructure Delivery Plan underpinning the Local Plan does not provide fully funded, deliverable, and timed solutions for road upgrades, wastewater capacity, education, or healthcare on the Hoo Peninsula.

4.4 Heritage and Rural Identity

The Neighbourhood Plan contains specific commitments to preserve the rural character, historic assets, and traditional settlement pattern of the parish. The Local Plan's scale of proposed growth will fundamentally alter the area's identity — effectively merging Hoo St Werburgh and Chattenden into a continuous urban area, contrary to the neighbourhood-level design principles.

This is inconsistent with NPPF paragraphs 131 to 141, which requires that planning decisions should ensure developments are “sympathetic to local character and history, including the surrounding built environment and landscape setting.”

4.5 Legal and Procedural Implications

Because the Neighbourhood Plan is more recent than the last adopted Local Plan policies for Hoo, any conflict must legally be resolved in favour of the Neighbourhood Plan unless the Local Plan explicitly justifies why it supersedes neighbourhood policies in a way that is itself lawful and consistent with the NPPF. No such justification is provided in the Regulation 19 draft.

Failing to address and resolve these conflicts not only makes the Local Plan **unsound** but also **not legally compliant** with section 38 of the 2004 Act and paragraph 31 of the NPPF.

Conclusion of Chapter 4:

The Regulation 19 Local Plan is in clear and direct conflict with multiple adopted Neighbourhood Plan policies for Hoo St Werburgh and Chattenden. These conflicts are not acknowledged, assessed, or justified in the Local Plan evidence base. Given the statutory status of the Neighbourhood Plan, the Local Plan's Hoo Peninsula allocations are unlawful in their current form and must be removed or relocated to comply with section 38(6) and the NPPF.

Chapter 5: Environmental and Habitat Constraints (HRA Evidence)

5.1 Legislative and Policy Framework

The **Conservation of Habitats and Species Regulations 2017** ("Habitats Regulations") require that before a plan is adopted, the competent authority must:

- **Screen** for likely significant effects (LSEs) on European sites; and, if LSEs are found,
- Undertake a **full Appropriate Assessment (AA)** that considers the plan's implications for site integrity, including cumulative effects, with mitigation measures that are proven, funded, and deliverable.

The **NPPF (December 2024)** reinforces this in **paragraph 182**, stating:

"The presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Habitats Regulations is being determined and the assessment concludes that it will adversely affect the integrity of the habitats site."

Paragraph **183** adds:

"Plans should protect and enhance sites of biodiversity value (in a manner commensurate with their statutory status)."

5.2 HRA Findings – Likely Significant Effects

The **Interim Habitats Regulations Assessment (June 2025)** confirms at paragraph E4:

“The screening identified the potential for likely significant effects on several European sites, alone or in-combination with other plans and projects.”

The sites identified include:

- **Medway Estuary and Marshes SPA/Ramsar**
- **Thames Estuary and Marshes SPA/Ramsar**
- **The Swale SPA/Ramsar**
- **North Kent Marshes SPA/Ramsar**

The causes of LSEs are set out in Table E.2 of the HRA and include:

- **Air quality deterioration** from road traffic emissions;
 - **Urbanisation pressures**, including predation, lighting, noise, and invasive species;
 - **Recreational disturbance** to bird feeding and roosting areas;
 - **Hydrological changes** and potential deterioration in water quality.
-

5.3 Interim Nature of the HRA – A Legal Barrier

At paragraph E2, the HRA makes a critical admission:

“This is an interim HRA report since some information which is necessary for the completion of the assessment is, at the time of writing, outstanding.”

This is a **fatal flaw** in legal compliance. Regulation 105 of the Habitats Regulations requires that a completed Appropriate Assessment must be undertaken *before* a plan is submitted for examination. The CJEU in *People Over Wind v Coillte Teoranta* (C-323/17) confirmed that mitigation cannot be relied upon at the screening stage and must be fully assessed in the AA.

Proceeding to submission with an incomplete AA exposes the plan to legal challenge and would require the Inspector to find it unsound and not legally compliant.

5.4 Mitigation Measures – Undefined, Uncosted, and Unproven

The HRA relies heavily on mitigation through the **North Kent Strategic Access Management and Monitoring Strategy (SAMMS)** and other site-specific measures. However:

- The HRA does not confirm **funding mechanisms** for the scale of mitigation needed;
- It does not present a **joint, cross-boundary visitor management plan** with Swale and Gravesham;
- Several mitigation proposals are described only in outline terms, with no delivery timetable.

NPPF paragraph 182 is clear: the presumption in favour does not apply if an AA cannot rule out adverse effects. Here, the AA has not even been completed, let alone proven effective.

5.5 Cumulative and In-Combination Effects

The HRA acknowledges at paragraph E5 that:

“The assessment has considered the potential for in-combination effects with other plans and projects.”

However, the cumulative impact analysis is incomplete because:

- It does not fully factor in the **Lower Thames Crossing** traffic impacts;
- It omits **housing growth in Swale, Gravesham, and Thurrock** that will also increase recreational and air quality pressures on the same designated sites;
- It does not quantify **combined nutrient loading** from wastewater discharges into the Thames and Medway estuaries.

Without a robust in-combination assessment, the HRA fails both the legal test and the NPPF requirement to plan for biodiversity net gain and site protection.

5.6 Required Buffer Zones

Best practice from other local authorities (e.g., Dorset, Cornwall, and Norfolk) shows that **400m and 1km exclusion/buffer zones** around sensitive habitats are an effective and enforceable way to prevent adverse urbanisation effects. The Medway Council Local Plan fails to adopt such zones despite the HRA evidence showing high sensitivity of nearby habitats to disturbance.

Not applying these buffers breaches NPPF paragraphs **182** and **183**, as well as the precautionary principle under the Habitats Regulations.

5.7 Implications for Hoo Peninsula Allocations

The Hoo Peninsula allocations — 14.9 and 14.10 — are the most ecologically constrained in the plan. The HRA confirms they are within functional ecological zones of multiple SPAs/Ramsar sites and would directly increase recreational disturbance and air pollution impacts. Under NPPF paragraph **11(b)**, the harm from these allocations “significantly and demonstrably outweighs” the benefits.

Conclusion of Chapter 5:

The Local Plan’s own HRA confirms likely significant effects on multiple internationally protected habitats. The assessment is incomplete, mitigation is undefined and unproven, and cumulative effects are inadequately addressed. Proceeding with these allocations breaches the Habitats Regulations, NPPF paragraphs 182–183, and the precautionary principle. The Hoo Peninsula allocations should therefore be removed and growth redirected to urban areas where environmental constraints are far less severe.

Chapter 6: Sustainability Appraisal Failures

6.1 Legislative and NPPF Requirements

Under the **Environmental Assessment of Plans and Programmes Regulations 2004** (“SEA Regulations”), a Sustainability Appraisal (SA) must:

- Identify, describe, and evaluate the likely significant effects of the plan, including reasonable alternatives;
- Present the reasons for selecting the preferred strategy over alternatives;
- Include measures to prevent, reduce, or offset adverse effects;
- Be prepared early enough to influence the plan, not retrospectively justify it.

The **NPPF (December 2024)** supports this in:

- **Paragraph 33** – the SA should demonstrate that the plan is the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;
 - **Paragraph 36(b)** – soundness requires that the strategy is justified through this process.
-

6.2 Reasonable Alternatives – Unfair Assessment

The **Sustainability Appraisal – Volume 2** (Section 5) identifies a range of growth options, including:

- **Option 1:** Higher-density urban-focused growth in existing towns;
- **Option 2:** Significant rural expansion, including large allocations on the Hoo Peninsula;
- **Option 3:** Urban growth with some rural expansion.

While the SA acknowledges in Table 5.4 that **urban-focused options score better** for accessibility, climate mitigation, and efficient use of land, the Local Plan nevertheless adopts a **rural-expansion-led strategy**.

The problem is twofold:

1. The urban-intensification alternative (Option 1) is not tested to the same spatial or site-specific depth as the chosen strategy (Option 3), contrary to SEA Regulation 12(2)(b).
 2. The SA fails to evidence why the more sustainable option was rejected, instead offering generalised statements about “land availability” without transparent capacity testing.
-

6.3 Residual Significant Adverse Effects

The SA **Volume 1** (Non-technical Summary) admits that the chosen strategy will cause **significant adverse residual effects** even after mitigation. Table N.7.1 lists:

- **Biodiversity:** Likely significant residual harm to designated habitats;
- **Soils:** Permanent loss of best and most versatile agricultural land (Grade 1 on Hoo Peninsula);
- **Landscape:** Irreversible urbanisation of rural landscapes, especially on the peninsula;
- **Air Quality:** Increased emissions in sensitive locations, including AQMAs.

NPPF paragraph 11(b) requires that where adverse impacts significantly and demonstrably outweigh the benefits, the plan should not proceed in that form. The SA’s own evidence reaches this threshold for the Hoo Peninsula allocations.

6.4 Incomplete Mitigation Analysis

Across all three SA volumes, mitigation for identified harms is either:

- Listed as “to be determined at project stage” (failing the SEA requirement to assess measures at plan stage);
- Dependent on funding streams not yet secured (particularly habitat mitigation and transport upgrades);
- Dependent on cross-boundary cooperation not yet formalised through Statements of Common Ground.

The absence of clear, funded mitigation undermines the SA’s role in demonstrating that the preferred strategy can be delivered without unacceptable environmental harm.

6.5 Cumulative and In-Combination Effects

The SA acknowledges the need to consider in-combination effects (Volume 2, Section 6.7) but:

- Does not fully account for **Lower Thames Crossing impacts** on air quality and traffic;
- Omits quantified assessment of combined recreational impacts from growth in Swale, Gravesham, and Dartford;
- Fails to model combined nutrient-loading impacts on estuarine habitats.

Without this cumulative assessment, the SA does not meet SEA Regulation 12(3) requirements or NPPF paragraph 33’s evidence-based justification test.

6.6 Lack of Strategic Habitats Buffer Policy

The SA identifies the risk of urbanisation impacts on nearby SPAs/Ramsar sites but does not assess or recommend the adoption of **400m or 1km buffers** as used by other local planning authorities. This is a missed opportunity to embed proven mitigation into the plan and undermines compliance with NPPF paragraphs **187–195**.

6.7 Hoo Peninsula Bias in Site Selection

The SA’s site appraisal tables (Volume 3 Appendices) show that several Hoo Peninsula sites scored **worse** on environmental criteria than urban brownfield or suburban sites, yet they were still allocated. For example:

- **Hoo St Werburgh & Chattenden 14.9** – high adverse scores for biodiversity, soils, and transport accessibility;
- **High Halstow 14.10** – high adverse scores for landscape, biodiversity, and agricultural land quality.

The SEA Regulations require that the reasons for selecting sites with worse sustainability scores must be clearly documented. This reasoning is absent.

Conclusion of Chapter 6:

The SA underpinning the Medway Council Local Plan fails to meet SEA Regulations and NPPF paragraph 33 because it does not fairly assess reasonable alternatives, does not fully mitigate adverse effects, omits key cumulative impacts, and fails to explain why environmentally worse sites were chosen over better urban options. This makes the plan **not justified** and **unsound**. The evidence within the SA itself supports the

removal of Hoo Peninsula allocations and a reallocation of growth to urban areas with better infrastructure and lower environmental constraints.

Chapter 7: Infrastructure, Transport, and Utilities Capacity

7.1 NPPF and Legal Requirements

The **NPPF (December 2024)** sets clear expectations:

- **Paragraph 20** – strategic policies should make sufficient provision for infrastructure for transport, water supply, wastewater, energy, telecommunications, flood risk, and health, security, community, and cultural infrastructure.
- **Paragraph 35** – plans should set out the contributions expected from development towards infrastructure, including the cumulative impact of multiple developments.
- **Paragraph 36(c)** – a plan must be **effective**, i.e., deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.
- **Paragraphs 187 to 195** – environmental mitigation must be deliverable and proven.

The **Planning and Compulsory Purchase Act 2004**, section 19(2)(j), also requires local planning authorities to have regard to the desirability of achieving net-zero greenhouse gas emissions and to infrastructure requirements.

7.2 Transport Infrastructure – Unfunded and Incomplete

The Hoo Peninsula allocations (14.9 and 14.10) are wholly dependent on significant **transport upgrades** to mitigate already severe congestion and air quality problems, particularly:

- **A228 and A289 corridors** – already over capacity at peak times;
- **Four Elms Hill AQMA** – in breach of nitrogen dioxide limits, with no funded bypass or relief road;
- **Rail capacity** – the peninsula lacks a mainline station; the towns railway lines are not directly connected to Hoo St Werburgh.

The Local Plan references potential upgrades (e.g., improved A228/A289 junctions, enhanced bus services, and possible park-and-ride facilities), but **none** are:

- Fully costed;
- Fully funded;
- Guaranteed for delivery in advance of development.

Without secured funding and binding delivery mechanisms, these proposals fail NPPF paragraph 35's requirement for clarity on contributions and delivery.

7.3 Water Supply and Wastewater Capacity

The **Habitats Regulations Assessment** confirms that additional wastewater discharges risk increasing nutrient loads in the **Medway Estuary and Marshes SPA/Ramsar** and the **Thames Estuary and Marshes SPA/Ramsar**. Yet:

- Southern Water and South East Water have not provided signed Statements of Common Ground confirming capacity upgrades will be in place when needed;
- The Infrastructure Delivery Plan does not confirm the scale, location, or funding source for new wastewater treatment infrastructure;
- Nutrient neutrality mitigation measures are not secured or costed.

These gaps make the Local Plan ineffective under NPPF paragraph 36(c) and contrary to paragraphs 187 to 195's requirement for proven mitigation.

7.4 Energy and Utilities

The growth proposed for the Hoo Peninsula will require substantial upgrades to:

- **Electricity supply capacity**, with no confirmed National Grid or UK Power Networks investment plans;
- **Telecommunications infrastructure**, particularly for high-speed broadband in rural areas;
- **Local substations**, where current capacity is already constrained.

The plan fails to evidence that such upgrades will be delivered in step with housing completions, contrary to NPPF paragraph 20.

7.5 Education and Health Services

The Infrastructure Delivery Plan anticipates:

- New **primary schools** and a new **secondary school** on the Hoo Peninsula;
- Significant expansion of **GP surgeries** and local health services.

However:

- NHS Kent and Medway Integrated Care Board has not confirmed funding or phasing for the new facilities;
- The plan does not commit to a “no occupation until infrastructure operational” policy, meaning housing could be built without adequate services;
- No evidence is provided on recruitment and retention of healthcare staff to rural locations.

These gaps conflict with the Hoo St Werburgh & Chattenden Neighbourhood Plan, which requires infrastructure to be in place before development proceeds.

7.6 Climate Change and Flood Risk Resilience

The plan acknowledges increased surface water and flood risk pressures from development on the Hoo Peninsula but does not:

- Secure funding for new flood defences or drainage upgrades;

- Integrate low-carbon transport infrastructure at the same pace as housing delivery;
- Assess the carbon impact of forcing new residents into car-dependent commuting patterns due to poor public transport.

NPPF paragraphs **161–186** require plans to proactively mitigate and adapt to climate change, yet the Local Plan’s infrastructure strategy does not meet this standard.

7.7 Deliverability and Viability

Without secured funding, agreed delivery timetables, or enforceable triggers for infrastructure provision, the Hoo Peninsula allocations are not deliverable. This undermines the **effectiveness** soundness test and breaches NPPF paragraphs 20, 35, and 36(c).

Conclusion of Chapter 7:

The infrastructure assumptions for the Hoo Peninsula allocations are unrealistic and unsupported by firm funding or delivery commitments. Transport, water, wastewater, energy, health, and education upgrades are uncertain, making the plan **ineffective** and **unsound**. These allocations should be removed, with growth reallocated to urban and suburban locations closer to existing infrastructure and services.

Chapter 8: The Case for Removing Hoo Peninsula Allocations under NPPF 11(b)

8.1 The Policy Test

NPPF (December 2024) **paragraph 11(b)** states that plans should meet development needs unless:

“The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The Hoo Peninsula meets **both** arms of this test:

1. **Protected Areas/Assets of Particular Importance** – including:
 - Medway Estuary and Marshes SPA/Ramsar
 - Thames Estuary and Marshes SPA/Ramsar
 - The Swale SPA/Ramsar
 - Chattenden Woods and Lodge Hill SSSI (nationally important nightingale site)
 - Extensive Grade 1 agricultural land
2. **Adverse Impacts Significantly and Demonstrably Outweigh Benefits** – including:
 - Irreversible loss of best and most versatile farmland (NPPF para. 187(b));
 - Increased traffic and air quality deterioration in an AQMA (Four Elms Hill);

- Inability to deliver necessary transport, water, wastewater, and utilities infrastructure in a timely and funded manner;
 - Recreational and air quality harm to European sites, contrary to NPPF paras. 187–201 and the Habitats Regulations;
 - Disruption of valued landscapes and rural character (NPPF para. 187(c)).
-

8.2 Supporting Evidence from the Plan’s Own Assessments

Both the **Habitats Regulations Assessment** and the **Sustainability Appraisal** acknowledge that the Hoo allocations cause **residual significant adverse effects** that cannot be fully mitigated. This is not disputed evidence — it is Medway Council’s own evidence base.

Where the Council’s own assessment confirms residual harm to irreplaceable environmental assets, the **precautionary principle** under the Habitats Regulations and NPPF paragraphs 187 to 195 applies, requiring removal of the allocations.

8.3 Incompatibility with the Hoo St Werburgh & Chattenden Neighbourhood Plan

The adopted **Hoo St Werburgh & Chattenden Neighbourhood Plan (November 2024)** sets a policy framework for **limited, infrastructure-led growth**, with a focus on:

- Protecting the rural setting and settlement separation;
- Delivering infrastructure in step with development;
- Avoiding harm to protected habitats.

The scale of allocations in the Regulation 19 Local Plan directly conflicts with these policies, undermining the statutory status of the neighbourhood plan under section 38(6) of the Planning and Compulsory Purchase Act 2004.

8.4 Conclusion for Chapter 8

Applying **NPPF paragraph 11(b)** leads to only one lawful and sound conclusion: the Hoo Peninsula allocations must be removed, and growth reallocated to more sustainable and less constrained locations.

Chapter 9: Alternative Strategy — Urban Density First Approach

9.1 Strategic Rationale

An **Urban Density First** strategy would:

- Focus growth in Strood, Rochester, Chatham, Gillingham and Rainham;
- Prioritise vacant brownfield regeneration and underused urban land;
- Increase densities in areas close to mainline rail stations and high-frequency bus corridors;
- Support town centre regeneration, service economies, and public transport viability.

This approach aligns with:

- **NPPF para. 124 and 125** – optimise density in locations well served by public transport;
 - **NPPF paras. 109 to 114** – focus significant development in sustainable transport locations;
 - **NPPF paras. 161 to 186** – reduce greenhouse gas emissions and promote climate resilience.
-

9.2 Benefits Over Current Strategy

1. **Infrastructure Efficiency** – Uses existing water, wastewater, electricity, and road/rail capacity, avoiding the need for major rural network expansions.
 2. **Environmental Protection** – Avoids direct harm to SPAs, Ramsar sites, and SSSI on the Hoo Peninsula.
 3. **Economic Regeneration** – Boosts footfall and investment in town centres.
 4. **Climate Benefits** – Shorter journeys, higher public transport mode share, lower per capita emissions.
 5. **Land Use Efficiency** – Preserves best and most versatile agricultural land.
-

9.3 How It Could Be Delivered

- Update and expand the **Brownfield Land Register** to capture underutilised land;
 - Apply **minimum density policies** in urban centres and near transport hubs (e.g., 50–100 dwellings per hectare within 800m of a station);
 - Incentivise mixed-use redevelopment of vacant retail and commercial premises;
 - Partner with Homes England for funding and delivery of urban regeneration sites.
-

9.4 Compliance with the SEA/SA Requirements

The Sustainability Appraisal did not properly assess this urban-intensification strategy as a fully developed alternative. A lawful and sound plan would revisit the SA, model this approach at equal detail to the current rural allocations, and transparently compare environmental, social, and economic outcomes.

Conclusion for Chapter 9:

An Urban Density First approach is a realistic, deliverable, and more sustainable alternative that meets housing needs without the unacceptable harm caused by Hoo Peninsula overdevelopment. It should be adopted as the spatial strategy in the next iteration of the plan.

Chapter 10: Conclusions and Requested Modifications

10.1 Legal Compliance Failures

The Regulation 19 draft Local Plan fails legal compliance because:

- The **Habitats Regulations Assessment** is incomplete and cannot lawfully support allocations causing likely significant effects on European sites;
 - The **Sustainability Appraisal** fails to fairly assess reasonable alternatives and omits key cumulative impacts, contrary to SEA Regulations;
 - The plan fails the **Duty to Cooperate**, with no effective agreements in place for cross-boundary environmental mitigation, transport upgrades, or water/wastewater infrastructure.
-

10.2 Soundness Failures

The plan fails all four NPPF paragraph 36 soundness tests:

- **Positively prepared** – does not meet needs in a way consistent with sustainable development principles;
 - **Justified** – reasonable alternatives (urban intensification) have not been properly considered;
 - **Effective** – infrastructure delivery is uncertain and unfunded;
 - **Consistent with national policy** – plan clearly conflicts with NPPF in multiple chapters.
-

10.3 Requested Modifications

1. **Remove Hoo Peninsula Allocations** (including 14.9 and 14.10) from the Local Plan.
 2. **Reallocate Growth** to the urban/suburban Medway Towns through a higher-density urban intensification strategy.
 3. **Adopt 400m and 1km Buffer Zones** around SPAs, Ramsar sites, and SSSIs to prevent urbanisation impacts.
 4. **Complete a Legally Compliant HRA** before plan submission, including full Appropriate Assessment and secured mitigation measures.
 5. **Re-run the Sustainability Appraisal** with a full, equal-weight assessment of the Urban Density First approach.
 6. **Secure Infrastructure Delivery Commitments** through binding agreements before allocating any large-scale growth sites.
-

Final Statement:

In its current form, the Regulation 19 draft Local Plan is not legally compliant, is not sound, and fails the Duty to Cooperate. The scale and location of growth on the Hoo Peninsula are incompatible with the NPPF, the Hoo St Werburgh & Chattenden Neighbourhood Plan, and statutory environmental protections. The requested modifications are necessary for the plan to pass examination and deliver genuinely sustainable development.

Thank you for taking the time to read this representation.



SAVE THE HOO PENINSULA

Michael Pearce

Campaign Leader

Save The Hoo Peninsula

Elizabeth Turpin

Deputy Campaign Leader

Save The Hoo Peninsula

From: [REDACTED]
To: [policy_planning](#)
Subject: Medway Local Plan Regulation 19 consultation - FOB submission
Date: 11 August 2025 23:54:56
Attachments: [Local Plan Reg 19 consultation - FOB submission.pdf](#)

Sirs,

please find attached pdf of Friends of Broomhill's submission to the Local Plan Regulation 19 consultation. It is short because it only addresses two significant points raised by our non-political voluntary organisation/charity, those being:

- the acknowledgment of Broomhill Park as a large open public space on the South West Policy Map
- our disquiet of allocating Grade 1 agricultural land for residential estates

We hope that Medway Council listens to our opinions and acts upon them when amending the Local Plan before submitting it to central government for scrutiny. And we trust that the following are incorporated:

- request that the full extent boundary of Broomhill is shown on the map
- that the park is registered

Thankyou for the opportunity for us to make our opinions known, and we hope that they are included in the final draft.

Regards

Andrew Millsom

Trustee

on behalf of Friends of Broomhill



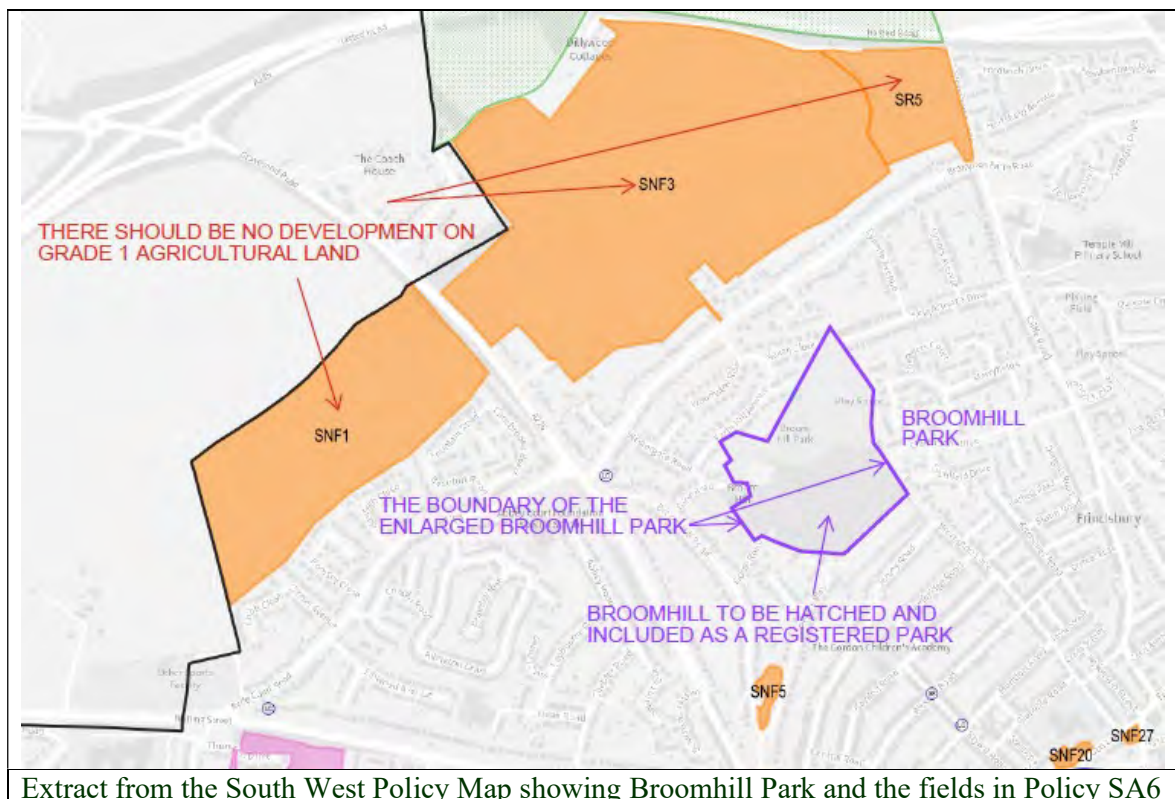
www.friendsofbroomhill.org.uk

Local Plan Regulation 19 Consultation - Friends of Broomhill Submission

The Friends of Broomhill is a non-political community volunteering organisation that owns the Old Orchard and works with Medway Council Greenspaces Department on maintaining and improving Broomhill Park. The trustees of the charity have striven over the years to enlarge and improve the open public space to the maximum extent within the confines of the surrounding housing, allotments and playing field. Thus, it is very disappointing that unlike Rede Common, Broomhill has not been hatched as a local nature reserve (not even the Old Orchard), and not hatched the same as The Vines in Rochester, i.e. as a Registered Park. Yet the park has won many Green Flags, and the Old Orchard was awarded a Gold from Kent Wildlife Trust in 2024 in the Wilder Kent category.

Therefore, we urge Medway Council to have the policy map revised so that the park is hatched as a Registered Park. If this is not possible, then to provide a new hatch for parks that are not determined Registered Parks but have high status, e.g. awarded the Green Flag. We would also like to have the parkland named and show the boundary of the full extent of the enlarged park, which we hope to completed in Spring 2026. The final enlargement shall be approximately 85% of that shown in the 2013-2023 Vision Document for Broomhill. A significant achievement for a voluntary organisation.

Below is a marked-up extract from the South West Policy Map showing the extent of the final extent of the parkland, it includes all Medway Greenspaces areas, the Old Orchard (owned by FoB since April 2018) and land at the top of the hill, where the former reservoirs were sited.



Extract from the South West Policy Map showing Broomhill Park and the fields in Policy SA6

In addition to our comments about the status of Broomhill Park, we also have severe concerns about Policy SA6: Land West of Strood. Areas SNF1, SNF3 and SR5 are Grade 1 agricultural land. And as a group that really appreciates nature and quality farming, it is our opinion an anathema to build housing estates on such fertile land.

For Medway Council to pursue such a policy without looking into alternative areas/sites is a contradiction of Medway Council's own policy T14: Rural Economy. That policy states other areas with lower grade agricultural land or brownfield sites should be considered before Grade 1 and/or 2 land is allocated, and only when the other avenues are exhausted would it be acceptable to consider using Grade 1 land. It is our opinion that searching for other sites has not been exhausted. Rather Medway Council is "piggybacking" on Gravesham Borough Council's proposal to allocate Chapter Farm land for residential units. Thus, Medway Council is contradicting its own Policy T14.

There is a possibility that Gravesham's Local Plan will not end up incorporating the farm, which would leave Medway Council's proposal left on its own; isolated and breaking its own policy criteria.

Therefore, we would like Medway Council to remove Policy SA6 from the draft Local Plan before it is submitted to central government for inspection and review.

On behalf of Friends of Broomhill,

Andrew Millsom
Trustee

08 AUG 2025

Professor Anan Shetty
Medway Hindu Temple and Cultural Centre

ME7

Date: 6th August 2025

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

Subject: Representation for Site Allocation – Hindu Temple and Cultural Centre in Medway

Dear Planning Policy Team,

I am writing to formally submit a representation in relation to the Local Plan process and to request the allocation of a suitable site within the Medway area for the development of a **Hindu Temple and Cultural Centre**. This representation is made in light of the growing demographic need and cultural significance for the Hindu community across Medway towns.

Background and Justification

1. Growing Hindu Population in Medway:

Medway is home to a steadily growing Hindu population, which includes a significant number of families of Tamil origin. This demographic development is reflective of national trends, and Medway stands as one of the more diverse boroughs in Kent. As such, the provision of religious and cultural infrastructure is both timely and essential to support this flourishing community.

According to the 2011 UK Census, there were over 816,633 Hindus living in England and Wales. The Southeast region has seen a steady increase in its Hindu population over the past decade, with many families

moving to areas such as Medway due to affordable housing, employment opportunities, and educational access.

- Locally surrounding towns such as Gravesend, Dartford, Maidstone, and Sittingbourne also report a visible and growing Hindu presence, reflected in cultural associations, community events, and language school enrolments.
- The Hindu community, many of whom have migrated from Sri Lanka, South India, and East Africa, forms a substantial part of this growth, maintaining vibrant traditions and religious practices that centre around temple worship and community gathering.

Despite this growth, there is currently no purpose-built Hindu temple in Medway, requiring families to travel to distant towns for spiritual and cultural activities.

2. Current Lack of Appropriate Facilities:

Despite the increasing presence of Hindu families, Medway and neighbouring areas currently lack a traditional Hindu temple designed in accordance with cultural and religious norms. Many members of the community are forced to travel long distances to London or other towns for worship and cultural activities, placing an undue burden on families and elderly devotees.

3. Serving the Wider Region:

A Hindu Temple in Medway would not only serve the local population but also act as a religious and cultural hub for nearby towns such as Sittingbourne, Maidstone, Dartford, and Gravesend, all of which host a significant Tamil-speaking population. Such a centre would reduce travel barriers and create a more connected and cohesive regional community. A purpose-built Hindu Temple would fulfil the long-felt spiritual and cultural needs of the Hindu community in Medway and serve as a focal point for the broader region. The temple would not only host religious ceremonies and festivals but would also:

- Offer language and cultural education to younger generations.
- Promote spirituality
- Promote health and well-being through yoga and spiritual practices particularly among elderly and other deprived population
- Facilitate interfaith engagement and promote community integration.

4. Fostering Integration and Inclusivity:

This project aligns with Medway's vision of inclusivity, cultural enrichment, and social cohesion. Beyond fulfilling spiritual needs, the establishment of this temple and cultural centre will promote social cohesion, interfaith dialogue, and mutual understanding. The centre will be open to all, offering opportunities for the wider public to engage with and appreciate Hindu culture and values. This will significantly contribute to Medway's ethos of inclusion, multicultural harmony, and community wellbeing.

5. Planning Policy Support

This proposal aligns with the objectives of the National Planning Policy Framework (NPPF), particularly in promoting healthy, inclusive communities and ensuring that sufficient community and cultural facilities are available to meet local needs.

Additionally, we urge the Medway Local Plan to consider the importance of **faith-based infrastructure** in fostering community integration and equality, particularly in areas experiencing demographic change.

6. Proposed Land Use and Facilities

We respectfully seek the allocation of suitable land in Medway to develop an integrated **Hindu Temple and Cultural Centre**, consisting of the following key components:

- **Traditional Hindu Temple:** A sanctified space for religious ceremonies, daily prayers, and major Hindu festivals, built according to traditional architectural principles.
- **Community and Cultural Centre:** A venue to host community events, festivals, Indian language classes and its integration with English language, Traditional Indian dance and music classes, yoga and wellness programmes, and interfaith forums.
- Programs for the elderly
- **Resource Centre for Cultural Education:** A facility aimed at educating younger generations and the wider public about Hindu values, traditions, and contributions to British society.
- **Multipurpose Hall:** A modest hall to accommodate family events, outreach programmes, and charitable activities supporting the local community.
- **Parking and Accessibility Infrastructure:** Sufficient parking space and provisions to ensure easy access for the elderly and persons with disabilities.

Site Criteria

The ideal site would meet the following criteria:

- Located within Medway towns with good transport access
- Appropriately zoned or suitable for change of use to community and religious use
- Sufficient in size to accommodate the proposed facilities and parking
- Sensitively located to minimise impact on neighbouring residential areas
- We are open to discussions with Medway Council to identify and assess specific sites that may be suitable for allocation.

Conclusion

We believe the proposed Hindu Temple and Cultural Centre is a timely and valuable addition to the Medway community. It will serve not only as a place of worship but also as a beacon of integration, education, and cultural celebration. This vision reflects the spirit of Medway's growing diversity and contributes to the social fabric of the region.

We urge the Council to acknowledge the significant unmet need for a Hindu Temple and Cultural Centre in the Local Plan and to allocate an appropriate site to serve this purpose. This will help ensure inclusivity, equity, and the recognition of Medway's diverse and evolving communities.


We would welcome the opportunity to meet with planning officers to discuss this proposal further.

Yours Sincerely,



Prof (Dr.) A A Shetty

President



Dr Mallika Sundaram

Secretary



Dr Ananth Puranik

Treasurer

(On behalf of the Hindu Community of Medway)



ME3

10 th August 2025

Subject: Objection to the Medway Draft Regulation 19 Local Plan - Irreversible Damage to a Potential World Heritage Site

1. Born from a successful campaign to protect a vital environmental haven, the Friends of the North Kent Marshes (FONKM) is a volunteer-led organisation dedicated to the preservation and appreciation of this unique landscape. The group was officially formed in 2004, evolving from the "No airport at Cliffe Campaign Liaison Group" which, in partnership with the RSPB and local authorities, successfully fought off government proposals between 2002 and 2003 to build a major hub airport at Cliffe. This victory was short-lived, as the threat re-emerged around 2007 with the then Mayor of London Boris Johnson's proposals for an estuary airport. FONKM, alongside its allies, was again instrumental in opposing these plans, cementing its role as a vigilant guardian of the marshes.
2. FONKM's core mission is to promote the marshes and ensure that this irreplaceable mosaic of habitats is protected from development pressures. This landscape's global significance has been further recognised by its inclusion in the RSPB-led bid for the East Coast of England, from the Thames to the Humber, to become a UNESCO World Heritage Site.[\[1\]](#)[\[2\]](#) This bid, which is supported by Medway Council, Kent County Council, and other local authorities, aims to secure the highest international recognition for the area's crucial role in supporting up to 300,000 migratory birds annually.[\[3\]](#)[\[4\]](#)
3. The Friends of the North Kent Marshes (FONKM) submits a formal and vehement objection to the Medway Council Draft Regulation 19 Local Plan. The proposed scale of residential development will cause profound and irrevocable damage to the internationally significant North Kent Marshes through a substantial and inevitable increase in recreational disturbance, rendering the plan unsound.
4. The North Kent Marshes, forming the southern anchor of the East Atlantic Flyway, are designated as a Special Protection Area (SPA) and Ramsar site, reflecting their global importance for vast populations of overwintering and breeding birds.[\[5\]](#) The evidence base underpinning the North Kent Strategic Access Management and Monitoring Scheme (SAMMS), a partnership that includes Medway Council, explicitly states that increased residential development leads to a direct increase in recreational use of the marshes. The scheme's very existence is an admission that new housing within a 6km radius of the protected sites has a detrimental impact. The proposed Local Plan allocates a significant number of new homes within this sensitive zone - The Hoo Peninsula, guaranteeing a surge in activities, like dog walking, known to disturb wildlife. While we support the principle of the SAMMS tariff on

developers, it is a mitigation, not a solution, and cannot compensate for the cumulative impact of thousands of new residents.

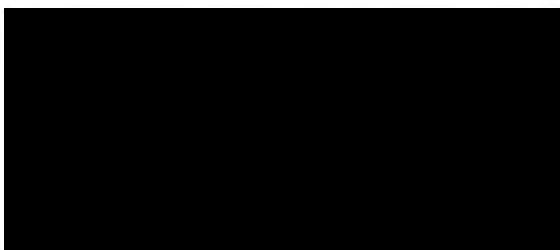
5. Crucially, this plan directly undermines a major conservation initiative that Medway Council itself supports. The North Kent Marshes are a key component of the RSPB-led bid to have the East Coast wetlands designated as a UNESCO World Heritage Site.[1][2][6] This bid, backed by Medway Council, Kent County Council, and other local authorities, seeks the highest possible protection for this chain of coastal habitats.[3][4] To simultaneously support this prestigious international recognition while advancing a Local Plan that will degrade the very asset in question is a profound contradiction. It sends a message that local development targets supersede national and international conservation commitments. The potential inscription as a World Heritage Site is expected to be assessed by UNESCO in the coming years, with a final decision possible by 2029.[3] Proceeding with this Local Plan would jeopardise this once-in-a-generation opportunity.
6. To be considered "sound," the Local Plan must ensure the conservation of the environment. By allocating housing on a scale that will demonstrably increase pressure on an already fragile and internationally protected ecosystem—one that is on the path to World Heritage status—the plan fails this critical test. The proposed development will lead to a tipping point where the damage from recreational disturbance becomes irreversible.
7. Further Para 1.3.12 of the Plan states: *"The HRA report supporting this Regulation 19 Plan is interim pending specific work on air quality assessment. The HRA will be updated and published for comments before the submission of the Draft Plan for examination."* There is no SA or HRA available to the public to support the Plan during the Reg 19 consultation period.
8. We urge Medway Council to reconcile its Spatial planning policy with its stated support for environmental conservation. The Council must reconsider the scale and location of the proposed housing allocations and give paramount importance to the preservation of the **North Kent Marshes**. The long-term health of this unique and irreplaceable environment, a candidate for World Heritage status, must not be sacrificed.

Sources help

1. [rspb.org.uk](https://www.rspb.org.uk)
2. [rspb.org.uk](https://www.rspb.org.uk)
3. [medway.gov.uk](https://www.medway.gov.uk)
4. [cmscoms.com](https://www.cmscoms.com)
5. [magnolia-platform.com](https://www.magnolia-platform.com)
6. [yorkshirepost.co.uk](https://www.yorkshirepost.co.uk)

The Friends of the North Kent Marshes

(Founding members J Darwell G Crozer and the late J Moore)



Rochester Eco-Hub response to Medway Draft Local Plan

Regulation 19 Consultation Response 11 August 2025

INTRODUCTION.

1. **Rochester Eco-Hub.** We are a group of residents from across Medway who are concerned about the natural environment. We meet in Rochester to discuss environmental issues and to plan positive actions such as litter picks and plastic free living.
2. **Regulation 19 Consultation.** This gives residents the opportunity to comment on the Legal Compliance and Soundness of the Medway Draft Local Plan set against National Planning Policy.
3. **Examination in Public.** Rochester Eco-Hub request to be permitted to attend the 'Examination in public' of the Medway Draft Local Plan.
4. **Timing.** The opportunity for Medway residents to respond to the Draft Local Plan Consultation has been timed to occur during the school summer holidays. This may result in the Inspector having fewer responses to consider and may unfairly disadvantage a particular birth cohort with school age children.
5. **Context.** The Medway Unitary Authority Area has a fantastic topography with two river estuaries, marshes, farmland and hills. It has a proud history and potential to use its many resources to the full, under the guidance of a dedicated planning team at Medway Council. *To improve the Legal Compliance and Soundness of the Draft Local Plan we believe more thought needs to be given to the following:*

NATIONAL PLANNING POLICY FRAMEWORK

1. **Sustainability:** Paragraph 7 of the National Planning Policy Framework states that 'the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.
2. **Objective of sustainable development.** 'Meeting the needs of the present without compromising the ability of future generations to meet their own needs'

UNITED NATIONS GOALS FOR SUSTAINABLE DEVELOPMENT

1. **United Nations Goals for Sustainable Development,** The United Kingdom has signed up to the UN 17 Global Goals for Sustainable Development, which address – social progress, economic well-being and environmental protection.
2. **Social objective.** To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
3. **Economic objective.** To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the

right time to support growth, innovation and improved productivity: and by identifying and coordinating the provision of infrastructure.

4. **Environmental objective.** To protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

STRONG, VIBRANT AND HEALTHY COMMUNITIES

1. **Homelessness.** Our Medway communities include a vast range of diverse people, life-styles, backgrounds, health conditions and needs. Among these the National Planning Policy Framework identifies people who need affordable housing and by definition 'homeless people' are included in the scope of the policy that the Local Plan must address. (House of Lords Library) *We urge Medway Council to include in the Local Plan the work that they are currently doing to alleviate and then eliminate homelessness in Medway during the plan period.*
2. **Allotments.** Communal gardens can be a great asset for helping Medway residents to live healthy and fulfilling lives. *The Local Plan should ensure that there is adequate provision of Allotments and Community Gardens to fulfil the needs of the residents.* At the moment there is a long waiting list and evident need for more spaces to be provided along with encouragement for allotment holders to share.

STRONG, RESPONSIVE AND COMPETITIVE ECONOMY

1. **Local Economy.** The National Planning Policy Framework supports small sites to come forward for community-led development for housing and self-build and custom-build housing. *The Local Plan should promote the local economy.* This can be achieved, via conditions written into agreements, design codes and contracts, once it has become the declared policy of the Council. Such a policy greatly assists, among others, developments undertaken under charitable and community funding, and should be included in the Local Plan.
2. **Neighbourhood Plans.** The National Planning Policy Framework encourages local communities to write their own 'Neighbourhood Plan', and sets out the parameters and relationships with the 'Local Plan'. *The Local Plan should encourage communities to make their own neighbourhood plans on a ward by ward, basis.* In a Unitary Authority the size of Medway, this would allow more residents to have their opinions heard and would create the basis for a more finely tune Local Plan to be written.
3. **Infrastructure provision.** The provision of essential infrastructure is not often imbedded in a developer's financial strategy and measures need to be taken to ensure that essential infrastructure is provided timeously. *The Local Plan should impose 'Grampian Conditions' on developers and specify pre-requisites before development can proceed.* The pre-requisites should be agreed with the local community through the Parish Council and Ward Councillor.

PROTECT AND ENHANCE OUR NATURAL, BUILT AND HISTORIC ENVIRONMENT

- 1. Sea level rise.** Due to global warming, water currently locked up as ice, in sea ice, polar ice caps, ice-sheets, glaciers and icebergs is melting and by 2100 we can expect sea levels to have risen by 300mm (12 inches). Marshland, valuable farmland and built-up areas will be affected. *Sea level rise needs to be studied and planned for and a map of areas at risk should be included in the Local Plan.* Neighbouring countries such as the Netherlands are planning in a positive way to meet the challenges of rising sea levels, currently up to the year 2100.
- 2. Environmental Assets.** The environmental assets of the Medway Unitary Authority area include some of the most internationally important, critical and sensitive natural habits and feeding grounds, lying within a proposed UNESCO World Heritage Site. These include an essential part of the 'East Atlantic Flyway' for migratory birds, Special Protection Areas, RAMSAR sites and Sites of Special Scientific Interest. 'RAMSAR' sites are designated under the Ramsar Convention, an international treaty for the conservation and sustainable use of wetlands. *The Local Plan needs to acknowledge that Medway has environmental assets of world significance and include policies that will support the proposed UNESCO World Heritage Site's adoption.*
- 3. Agricultural land.** One impact of global warming will be more extreme weather conditions, with hotter, drier summers and colder wetter winters. This will have a detrimental effect on our farming output and make good agricultural land even more precious. *The Local Plan must make it absolutely clear that no development on agricultural land will be permitted.* Medway Council need to inform their Ward Councillors and Officers, regarding the Agricultural Land Classifications last revised in 1988 by the former Ministry of Agriculture, now Department for Environment, Food and Rural Affairs. The Classifications relate to 'uncorrectable characteristics' of agricultural land and the Council should be aware of spurious soil testing, by developers, relating to the 'correctable characteristics' of agricultural land.
- 4. Brownfield sites.** The National Planning Policy Framework supports the aims of constructing carbon-neutral buildings, in existing urban areas on previously developed land with walking, cycling and public transport as the main means of transport. *The Local Plan should have at least 85% of the sites identified for development on 'brownfield' and previously developed land and Medway Council should keep an up to date 'Brownfield site register'.*
- 5. Public transport.** Buses are an intrinsic, and for some the primary, part of our public transport options. When considering development proposals, it should not be forgotten that buses use the same road network as private vehicles and that more frequent buses might just add to the existing road congestion. *The Local Plan should adopt an holistic approach to transport with its first objective to reduce the need to travel on the highway network.*
- 6. Development in rural areas.** The National Planning Policy Framework requires that developments should not be permitted outside of urban areas, except in exceptional

cases, away from peoples' work, services and facilities. *Building on previously undeveloped land in rural areas is not sanctioned by government and not considered as sound planning policy and should not be part of the Local Plan.*

7. **Environmental Delivery Plans**, Part 3 of the soon to be enacted 'Planning and Infrastructure Bill allows for Environmental Delivery Plans to be formulated. That would enhance protection for the environmental features in question with developers paying into a 'Nature Restoration Fund'. *The Local Plan should identify how Medway Council will interpret the new legislation, such that mitigation measures are not seen to override unarguably unsustainable development proposals.*
8. **Future Homes Standard**. The National Planning Policy Framework supports the aims of constructing carbon-neutral buildings. Building construction currently contributes around 40% of our carbon emissions. *The Local Plan should identify and plan for the implications of the 'Future Homes Standard' this will have a far-reaching impact on housing developments, and force developers to build in a more environmental and sustainable way.* Planning Applications currently under consideration, will not comply with Building Regulations when the Future Homes Standard comes in to force in the Autumn of this year.
9. **Houseboats**. By its nature, the Medway Council area has potential for residential marinas to be developed, on non-sensitive areas to accommodate houseboats constructed to the equivalent of the 'Future Homes Standard'. *The Local Plan should review many and varied ways to provide sustainable accommodation for its residents, without jeopardising the environment.*