# Medway Local Plan Inquiry – Stage 2 Hearing Statement by Ray Dines.

## Capstone Valley Proposed Housing Allocations LW4 and LW8 (Policy SA7) Inspectors Questions 13.76 to 13.91

## 1. Introduction and Contents

I have been a resident of Lordswood since 1979 and worked for some 20 years as a Senior Transport Planning Manager with Kent County Council. In more recent times I have supported Bredhurst and Boxley Parish Councils with their consideration of various planning and highway matters including the Maidstone Local Plan.

In my professional career I gave evidence on behalf of the County Council at various Public Inquiries relating to Local Plans and major transport schemes.


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Appendix 1 – Letter dated 5.9.2024 from Tristan Osbourne MP.

# 2. Landscape Setting and Ecology

## Inspectors Questions 13.79 to 13.82

2.1 The Capstone Valley forms part of an important green corridor linking the Great Lines in Gillingham to the North Downs National Landscape at Bredhurst. The views along Capstone Valley, particularly from Darland Banks, have formed a valued recreational landscape since at least Victorian times.



2.2 The ongoing East Hill (LW6) development has already caused a notable change to that historic landscape, particularly when viewed from Darland Banks, parts of Hempstead and Capstone Farm Country Park.

2.3 The landform is changing to create development platforms, access



roads, and drainage features. View from Darland Banks  April 2026.

2.6 By July 2026 the scale of the earth works is more apparent in this



aerial view looking south from Darland Banks.

**The East Hill development (LW6) is now a reality, but it shows the scale of visual and environmental impact of development in such undulating landscape. There is no evidence to show that the Capstone Valley has the capacity to take another 2800 houses (LW 4 and LW8) without significant harm.**

**Please also see the consultation response dated 5 September 2024 from MP Tristan Osbourne (Appendix 1 -page 2).**

2.7 The proposed Local Plan allocations in the Capstone Valley (sites LW4 and LW8) conflict with the draft Local Plan's own policies, including:

- Policy S1 – Planning for Climate Change.
- Policy S2 – Conservation and Enhancement of the Natural Environment
- Policy S4 – Landscape Protection and Enhancement
- Policy DM3 – Air Quality & Policy DM4 – Noise and Pollution

2.8 The proposed development is also inconsistent with the recommendations of the Medway Landscape Character Assessment (LUC, June 2024), Areas D3 and D4. (Inquiry document B7).

2.9 The photo below (April 2026) looks south-eastwards from North Dane Way towards Elm Court (top right). The development of this area would result in the coalescence of Lordswood with Hempstead.



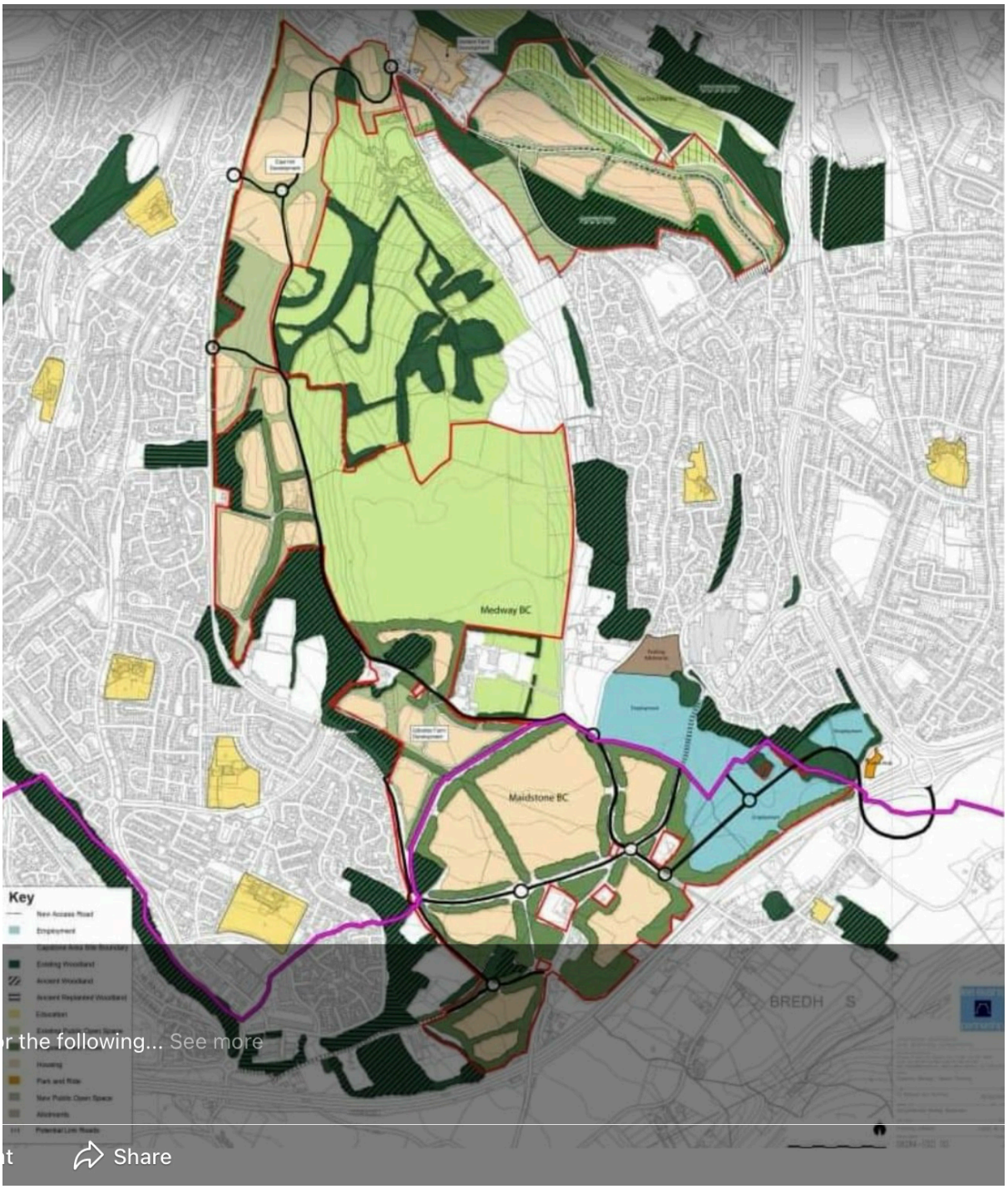
The Millfields site, LW8, is immediately to the south of Capstone Country Park (centre left).



2.10 The southern section of LW4 adjacent to North Dane Way showing the public footpath flanked by hedges in the foreground. Long distance views from the footpath towards Darland Banks, Capstone Country Park and Hall Wood (top left) would be lost.

2.11 The Site Promoters original Masterplan below shows “Millfields” LW 8 as green space that would provide a logical and highly beneficial expansion of the Country Park.

The contours of the land to the south and west of the Country Park including LW4 would offer a unique opportunity to create scarce chalk downland and maintain an effective green corridor between Lordswood and Hempstead.



2.12 Historically, Medway Council have protected the Capstone Valley to prevent coalescence between Lordswood and Hempstead.

2.13 In the current 2003 Local Plan, the whole of these proposed allocations lies within an Area of Local Landscape Importance (Policy BNE34).

Extract from 2003 Local Plan:

(xi) **CAPSTONE, DARLAND and ELM COURT**

**Location and character**

A substantial tract of undeveloped land extending from the North Downs as a green wedge into the heart of the urban area.

**Function**

Particularly attractive and important landscape feature defining urban areas, and preventing coalescence of Lordswood/ Princes Park and Hempstead.

Contributes significantly to informal open space needs of the communities which adjoin it.

Provides a rural landscape in close proximity to the urban area, bringing the countryside into the town.

Provides a wider landscape setting for Capstone Farm Country Park.

Contributes to the setting of the Kent Downs AONB to the south and the M2 motorway.

2.14 The draft Local Plan "Concept Plan" for the area (A1 Figure 13 -page 273) lacks detail and strategic coherence. The proposed "Green Infrastructure corridors" are not support by any design detail to prove that they would be effective. Figure 2 paragraph 4.6.5 is equally vague.

2.15 There has been no landscape capacity assessment for this area comparable to the work undertaken for development for Hoo.

This is confirmed in the Sustainability Assessment V.1-page N39 where it states in bold type, **"uncertainty remains in regard to the impact of allocations in the Capstone Valley on the setting of the National Landscape in absence of specific landscape sensitivity/capacity assessment covering the area".**

2.17 The draft Local Plan paragraphs 4.7.2 and 4.7.7 reinforce the importance of the Capstone Valley to the setting and the connectivity of the Kent Downs National Landscape and the Capstone Country Park. There are similar statements in Enquiry document C2.7 (July 2024) (The draft Green and Blue Infrastructure Plan) (Plan 23 – Page 90 is particularly relevant). The updated document MLP/EP37 makes no fundamental change.

2.19 Site LW4, surrounding Shawstead Farm lies within the best landscape at the heart of the Capstone Valley. This can be viewed from the public footpath that runs downhill from North Dane Way to Shawstead Farm and then climbs towards the Country Park.

View from footpath towards Darland Banks.



2.20 Site LW8 forms a high plateau south of the Country Park and from personal observation I am aware that it is an important stronghold for the "red-listed" skylark and other ground nesting birds.

The public footpath from Shawstead Farm to Hempstead provides 360-degree views of the surrounding rural countryside.

2.21 There has been no Ecological Assessment for these sites and no evidential basis for the statement in paragraph 14.8.4 of the Draft Local Plan that the land "has limited biodiversity value and public access" or the claim that "development would improve biodiversity and public access."

2.22 The draft Local Plan (paragraph14.8.1) states that "**The Capstone Valley forms a steep sided dry valley consistent with the landscape character of the Kent Downs National Landscape which was a target for the original designation of the Kent Downs. It also forms part of a valued countryside gap between existing built-up areas that flows into the Kent Downs to the south"**

2.23 The Sustainability Assessment Non-Technical Summary Page N21 (Table n.5.4) scores the Capstone Valley as a **"major negative"** in terms of Landscape, Natural Resources and Climate Change Mitigation.

# 3. Other Environmental considerations.

## 3.1 Ground Water Aquifers.

3.1.1 The ground water aquifer is close to the surface in the vicinity of the Wagon at Hale (near LW6). As identified at the Stage 1 Hearing (Inspectors question 6.41). – Groundwater Source Protection Zones and the Principal Aquifers have not been defined for the purposes of Policy DM1. The action point requested by the Inspectors has not been addressed by the Council.

3.1.2 The combined impact of allocation LW6, LW4, LW8 and LW 7 on the ground water aquifers has not been assessed.

## 3.2 North Downs Woodland Special Area of Conservation (SAC)

I will deal with the implications on the SAC in the following section of my Hearing Statement (paragraphs 4.6 – 4.12).

# 4. Transport and Infrastructure (Inspectors questions 13.83 – 13.90)

4.1 Allocations LW4 and LW8 are dependent on improved connections to M2 at junctions 3 and 4 that already operate beyond design capacity.

The proposed allocations LW4 and LW 8 are unsound because: -

- They rely on infrastructure to be provided in connection with the Lidsing Development but there is no certainty that the improvements at M2 Junction 4 or the East- West link will be provided within the plan period.
- The Infrastructure Delivery Plan (B2) dated December 2025 (paragraph 2.6 Capstone Valley) is silent on the matter of Transport Infrastructure. The Statement of Common Ground between the site promoters and the Council (MLP/ED 24c) is equally unhelpful.
- The connection to M2 junction 4 lies within the North Downs National Landscape and has no status in either the Maidstone or draft Medway Local Plans. The approval process would be complex and "exceptional need" for works within the National Landscape is yet to be proven.

4.2 There is no National Highways-approved scheme for the proposed new link road to M2 junction 4. Doubts remain as to whether the scheme can be constructed within the scheme promoter's landholding. There is no planning consent for the continuation of the "East-West Link" or it's connection to North Dane Way.

4.3 The construction of a replacement bridge over the M2, at an angle to the existing structure, would be a complex operation. The practicality, cost, viability, and timing of such scheme is very uncertain. There is no evidence that there has been any progress with the detailed design of this scheme since the Maidstone Local Plan Inquiry in 2022/23.

4.4 This uncertainty is reinforced by the Council's promotion for an "Interim Scheme" for M2 junction 4 (B18.7, paragraph 13.3). This approach was specifically ruled out by the Maidstone Local Plan Inspector (paragraphs 161 and 162).

4.5 With or without the proposed fourth arm of M2 junction 4, additional traffic resulting from the full development in Capstone Valley would also place unacceptable pressure on:

- Boxley Hill and the surrounding lanes within the North Downs National Landscape, including the villages of Bredhurst and Boxley.
- Shawstead Road, Ham Lane, Capstone Road and Hempstead Road leading to the residential section of Chapel Lane, Hempstead Valley Drive, Sharsted Way, A278 (Hoath Way) and the M2 at junction 4.
- Residential streets including Albemarle Road, Clandon Road, Gleaming Wood Drive, and Lordswood Lane, which provide direct routes between North Dane Way and M2 junction 3 via Walderslade Woods Road.

The Maidstone Local Plan Inquiry identified the need for wide range of junction mitigations within the Medway Council area, and the additional traffic impact of the proposed Capstone Valley allocations needs to be carefully considered. This can not be progressed in the absence of any access or public transport strategy for the proposed allocations LW 4 and LW8.

4.6 **The impact on North Down Woodland SAC remains unresolved following Maidstone Local Plan Inquiry.** Medway Council rely on a toolbox of mitigation measures indentified at the Maidstone Local Plan Inquiry in 2022/23.

4.7 This" toolbox" is a generic list with little or no substance. The main village streets in Bredhurst and Boxley already have significant traffic calming, and it is unlikely that additional measures would be workable or effective.

4.8 The suggestion that Boxley Hill could form part of a utility cycleway is unrealistic given its steep gradient, lack of lighting and torturous alignment.

4.9 The predictions relating to reduced external trips due to proposed on site employment are also optimistic particularly bearing in mind that this use will not be able to come forward until the completion of the full improvements at M2 junction 4 (Maidstone Local Plan paragraph 176).

4.10 Overall these measures are unlikely to be effective given the strong desire for motorists to take the shortest and quickest route to and from Maidstone Town Centre (Inspector's Report paragraphs 169-171)

4.11 The Maidstone Local Plan Inspector saw the completion of the full improvement of M2 junction 4 and the provision of the "East -West link" to be of primary importance to control flows on unsuitable roads including those impacting on the SAC. (Inspector's report paragraphs 166-169).

4.12 The combined impact of housing development at sites LW4, LW6, LW7 and LW8 (some 4000 houses) together with the proposed 2000 houses and Business Park at Lidsing would inevitably result in a very substantial increase in traffic flows through the villages of Bredhurst and Boxley and impacting on the SAC.

4.13 Kent County Council have identified the need for improvements to M2 junction 3 and the A229 Bluebell Hill to M20 junction 6 but there are currently no detailed designs, costings, or time scale for completion.

4.14 This matter has become more urgent with the start of construction of the Lower Thames Crossing. The A229 forms a strategic link between the M2 and M20 and is forecast to carry significantly more traffic (particularly HGVs) with the completion of the LTC. (Maidstone Local Plan Inspector's Report paragraphs 164 and 165)

## **5.** Sustainability

5.1 The topography of sites LW4 and LW8 would not encourage pedestrian or cycle movements. The sites are remote from rail services and established bus routes. The guidance in the 2024 version of NPPF Part 9 paragraph 109 (carried forward and reinforced into the 2026 version) places emphasis on the need for development to be located close to well-connected stations.

5.2 The importance of a vision led approach and the consideration of sustainable transport provision at the earliest stage of plan-making is also stressed. The Council's approach to Master Planning in this case does not comply with that guidance,

5.3 The Capstone Valley allocations are dependent on an "Orbital Bus Route" and the related connection between North Dane Way and the M2 at junction 4 (A1 paragraph 14.8.3 and paragraph 10 of Policy SA7).

This proposed Orbital Bus Route is based on the extension of the existing 166 bus service through the Lidsing development to Hempstead Valley Shopping Centre. However, this provides no solution for the proposed

allocations LW4 and LW8 that would require a completely new service. (The 166 service is routed via Lordswood Lane and Princes Avenue by-passing the potential housing allocations LW4 and LW8)

5.4 These sites are also poorly related to existing Secondary Schools, Health Centres and other local facilities. **Overall, the sites LW4 and LW8 are unsustainable** and assessments have not taken full account of the topography of the land or its isolation from public transport.

5.5 The proposed allocations to not comply with Local Plan Policies T25(Lack of any User Hierarchy, unsuitable topography to encourage pedestrian/cycle usage and no Public Transport Strategy) and T26 (Failure to show compliance with accessibility standards).

5.6 The current development at East Hill (LW6) raises similar concerns. The public footpath from North Dane Way to the Country Park has been closed since the start of the Phase 1 development and there is no provision within the development strategy for a safe pedestrian and cycle route between the Luton Recreation Ground and the Capstone Country Park.

It is also unclear now residents from this East Hill development (LW6) will gain convenient access to the existing 166 bus service along North Dane Way (given the existence of a tree lined embankment between the site and the bus stops). Compliance with Policies T25 and T26 has not been shown.

# 6. Traffic Modelling

6.1 There are serious concerns about the modelling of proposed allocations LW4 and LW8 in B18.1, Forecasting Report and B18.7, Junction and Modelling Mitigation Report (December 2025)

- The focus of these reports is very much on the A228 corridor.
- The design and model outputs for M2 junction 4 originate from a third party, Charles and Associates Consultants, acting on behalf of the Capstone Valley scheme promoters (B18.1, page 129, paragraph 8.3.8). That input cannot therefore be regarded as independent.
- Modelling of proposed allocations LW4 and LW 8 has no credibility in the absence of an Access or Transport Strategy.
- The number of houses assumed for the Lidsing development (1,300) in B18.1, Table 3-3, page 24, is incorrect; the actual number should be 2,000. The assumptions at page 44 are also

either inaccurate or impractical and are inconsistent with Figure 4.3 on page 45.

- The assumptions in B18.1, Table 5-4, page 54, for simple priority junction connections to sites LW4 and LW8 are inappropriate. Shawstead Road, Capstone Road and Ham Lane are single-track rural lanes and not suitable to serve development of this scale. Please see the photograph of Shawstead Road on page 16.
- The very short merge from the M2 junction 4 interchange onto the new fourth arm of the junction would not be effective or safe. The full detail of the proposed fourth arm and the new bridge over the M2 (B18.1, paragraph 8.3.8) is not shown on the plan. There is no NH approved plan or Safety Audit.
- There is no assessment of the need for right turning lanes at the junction with The Street, Bredhurst or Maidstone Road or the safe bridge width requirements for pedestrians, cyclists, and equestrians.
- The proposed interim scheme (B18.7, paragraph 13.3) cannot be assessed in isolation. Without the new East-West link there would be an intolerable impact on local roads. (Maidstone Local Inspector's final report paragraphs 161 and 162)

Shawstead Road looking southwards from the farm entrance (23.10.2026)



# 7. Conclusions

The proposed allocations LW4 and LW8 are unsound because the proposals:

- Contradict the Local Plan's environmental and landscape policies.
- Are inconsistent with the LUC landscape assessment, Making Space for Nature and the Green/Blue Infrastructure documents before this Inquiry.
- Would adversely impact on the setting the North Downs National Landscape, the Capstone Country Park and the Green Corridor between them.
- Would cause unacceptable harm to a historic landscape, local ecology, and the enjoyment of the area's dark skies and tranquility.
- Undermine long-established spatial policy aimed at protecting the Capstone Valley and preventing settlement coalescence.
- Have an unacceptable air quality impact on the North Downs Woodland SAC.
- Do not assess the potential impact of the development on Ground Water Aquifers.
- Do not show compliance with Transport Policies T25(User Hierarchy) or T26 (Accessibility Standards)
- Lack a credible or detailed masterplanning framework. The proposals do not comply with NPPF requirements for a vision led approach to Sustainability at the earliest stage of plan-making.
- Depend on infrastructure for which there is no approved design, funding package, or demonstrated deliverability.
- Rely on narrow country lanes to provide a primary means of access.
- Rely on flawed Transport Modelling that does not accurately reflect the nature and interaction of proposed developments at Lidsing and within the Capstone Valley or the details of the associated infrastructure.

- Pose significant and unresolved road safety and capacity issues, particularly affecting the villages of Bredhurst and Boxley and various locations within Medway.

For these reasons, the removal of allocations LW4 and LW8 is the necessary remedy if the Local Plan is to be justified, effective, deliverable, and consistent with its own landscape, ecology, transport, and settlement-separation objectives.

Appendix 1 – consultation response by Tristan Osbourne MP – 5 September 2024.

HOUSE OF COMMONS

LONDON SW1A 0AA

Medway Council
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Our Ref: Local Plan 2041 5 September 2024

I am writing to contribute to the Regulation 18 consultation on the Medway Council Local Plan 2041. First and foremost, I want to express my formal gratitude to the dedicated staff at Medway Council who have worked tirelessly to engage the wider community in Chatham and Aylesford throughout this process. Their efforts, through both digital activities and in-person events, have been invaluable in ensuring broad participation and transparency.

The importance of this Local Plan cannot be overstated, as it will shape the future of our communities by balancing new housing needs with sustainability, placemaking, and investment opportunities. Without an up-to-date Local Plan, Medway remains vulnerable to speculative and predatory developments, as recently evidenced by the outline permission granted for 450 homes at Gibraltar Farm in Hempstead and Lordswood. The absence of a robust Local Plan was also highlighted by Shadow Housing Spokesperson, Cllr Andrew Lawrence, who noted that the lack of a Local Plan has undoubtedly undermined our position to oppose predatory developments including on Capstone Valley.

The failure to secure an approved Local Plan over the past 15 years, during successive Conservative-led administrations under Rodney Chambers OBE and Alan Jarrett, has been a costly setback for Medway. This failure, compounded by the actions of the former Rt Hon Kelly Tolhurst MP in undermining the prior Plan, led to the loss of £170 million in Housing Infrastructure Fund (HIF) funding—an outcome many regret.

I fully endorse Medway Council's vision for 2041, which seeks to enhance the area's economic and cultural position within the region while preserving its rich heritage and natural environment. The draft Local Plan's commitment to reducing carbon emissions, promoting sustainable development, and protecting both natural and cultural heritage is commendable. Medway's ambition to lead in green growth, supported by high standards of sustainable building, retrofitting, and adaptation, is a forward-thinking approach that will benefit our communities for generations to come.

The road ahead will undoubtedly be challenging. While the draft Local Plan addresses a wide range of issues, housing remains a particularly critical area of focus. House prices in Medway have surged by over 23% in the past five years, exacerbating an already severe affordability crisis. The private rented sector is under immense pressure, and the growing reliance on temporary accommodation underscores the urgent need for sustainable growth. To meet demand, Medway must build 1,658 homes annually, supported by vital infrastructure improvements to ensure the development of strong, resilient neighbourhoods.

Regarding the three spatial growth options presented in the consultation, I formally support Option 3: the Blended Strategy. This approach, which prioritises the use of brownfield sites before developing suburban and rural areas, strikes the right balance between meeting housing needs and preserving the environment. Approximately 50% of new development is expected to take place on brownfield sites by intensifying existing urban centres and waterfront locations. This strategy allows us to deliver the necessary housing and

infrastructure while maintaining the character and heritage of our area.

However, I would like to add three caveats to my support for Option 3:

Firstly, with regard to the spatial planning of sites in regards to the Capstone Valley corridor. The consultation document acknowledges that Capstone Valley, in particular, shares similar characteristics to the landscape of the Kent Downs and contributes to its setting. It is a 'gateway' to the Area of Outstanding Natural Beauty (AONB) and provides a key function as a transition zone between the AONB and built-up areas of Medway. The area is identified as a strategic component of green infrastructure in Medway, with the potential for strengthening cross border green networks. The broader Capstone Valley is already subject to a confirmed 2,000 home proposal on Lidsing; a further 450 home development on Gibraltar Farm; as well as granted appeal permission for the 800-home East Hill Development.

I believe that the context regarding Capstone Valley has now changed and it's currently more than fulfilling its fair allocation of housing with those permissions by both Maidstone and Medway Councils with shared Housing allocation a possibility with Lidsing. I am therefore requesting that in the spirit of fairness that no further sites on the Capstone Valley are considered adjacent to the North Dane Way Road.

Secondly, the neighbouring boroughs of Gravesham, and Tonbridge and Malling, have both undertaken Green Belt Reviews as part of their Local Plan processes. Green Belt adjacent to the Medway boundary forms part of their respective assessments. It is noted that there is a narrow gap between the urban areas of Snodland and Halling where there is the potential of greyfield development. I have grave concerns about any such urbanisation and the loss of identity of such an expansive proposal. I am therefore requesting protections for this specific location to stop any rural sprawl that would adjoin these two distinct areas; that exist across Local Authority boundaries and have entirely separate Local Governance models.
In the consultation document it states that "The Council attaches great importance to the function provided by the green belt along its western boundary with neighbouring boroughs." and I would request this be the consistent and maintained position and that there is no agreement with Conservative-led Tonbridge and Malling Borough Council for any shared housing at this location.

Lastly, development can be a good thing and it's important for community confidence that developers communicate these important messages. During the construction phase, when hoarding or heras fencing is erected, developers should include displays which communicate the contributions they're making through the planning process to local infrastructure, e.g. schools, green spaces, etc.

In conclusion, the Blended Strategy offers a responsible and sustainable path forward for Medway. It reflects the shared responsibility of all areas within Medway to contribute to the solutions needed for growth while ensuring that development is guided by robust design principles, heritage and environmental considerations. I support the draft Local Plan 2041 and encourage Medway Council to adopt Option 3, with my caveats, as the preferred strategy for our future. Thank you for the opportunity to contribute to this consultation.

Kind regards,



Tris Osborne MP