EXAMINATION OF THE MEDWAY LOCAL PLAN 2041

PHASE 2 HEARINGS – MATTER 13: SITE ALLOCATIONS

BOXLEY PARISH COUNCIL

OCTOBER 2026

Summary of submissions

1. These written submissions are made on behalf of Boxley Parish Council ("BPC"). They address the Inspectors' questions under Matter 13 that bear on the proposed allocations LW4 (Shawstead Farm) and LW8 (Mill Fields) within Policy SA7 (Capstone Valley).[1]

2. These submissions should be read alongside BPC's submissions on Matter 9 (Transport) and the separate transport submissions prepared by John Russell Transport Planning, which form part of this Hearing Statement (see below).

3. Paragraph 115 of the December 2024 NPPF requires that, in assessing sites that may be allocated, "it should be ensured" that any significant impacts on the transport network can be cost-effectively mitigated to an acceptable degree through a vision-led approach. Paragraph 116 states that the residual cumulative impacts should be judged "taking into account all reasonable future scenarios". One reasonable future scenario, identified by National Highways and Kent County Council, is that the Junction 4 improvements to be delivered by Lidsing do not come forward in time, or at all.[2] The Council has not yet shown how LW4 and LW8 could proceed in that scenario.

4. Allocations LW4 and LW8 are also inconsistent with the Plan's own landscape and green infrastructure policies. They are unsupported by any site-specific landscape evidence. Accordingly, LW4 and LW8 are not justified or effective, and they should be deleted from Policy SA7.

[1] MLP/ED35, Schedule of Matters, Issues & Questions (Phase 2), questions 13.76–13.91 and 13.161–13.163.

[2] MLP/ED20, paras 2.5.3–2.5.4.

13.76 What evidence demonstrates that the scale of development proposed (up to 3,958 new homes) within Capstone Valley is justified having regard to the spatial development strategy and reasonable alternatives? / 13.77 How were the allocated sites selected and what alternatives were considered and discounted?

Summary answer

5. The evidence does not show that the scale of development is justified. In particular, it does not show why LW4 and LW8 were selected, as late additions to the Plan, in preference to reasonable alternatives. See further Mr Russell's transport-related submissions below.

6. The Sustainability Appraisal scored both LW4 and LW8 negatively (minor) for landscape, for transport and accessibility, and for health and wellbeing. Both score "significant negative" for natural resources, and LW8 also scores "significant negative" for pollution.[3] The appraisal does not explain why those adverse effects were accepted when other sites were discounted.

7. The transport modelling also assumes that LW4 and LW8 connect to the network by simple priority junctions.[4] Shawstead Road, Ham Lane and Capstone Road are single-track rural lanes that are not suitable to serve development on this scale. The assumed housing figure for Lidsing (1,300 dwellings) also understates the allocated figure of circa 2,000 homes.[5]

13.79 What evidence demonstrates that the proposed quantum and form of development can be accommodated without unacceptable harm to the landscape character of Capstone Valley?

Summary answer

8. No evidence demonstrates this.

---

[3] Sustainability Appraisal Vol. 3 (A3.3), Appendix, site appraisal matrix for LW4 and LW8.

[4] Forecasting Report (B18.1), Table 5-4.

[5] B18.1, Table 3-3; MLP/ED23, Policy LPRSP4(B), Phase 3.

Landscape sensitivity

9. The Sustainability Appraisal records that the Capstone Valley has not been subject to a specific landscape sensitivity/capacity assessment, particularly in relation to the setting of the Kent Downs National Landscape.[6] It acknowledges that "uncertainty remains in regard to the impact of allocations in the Capstone Valley".[7] An allocation of this scale cannot be justified with that level of uncertainty. The Council was aware of this gap at Regulation 18 stage and did not seek further evidence to fill it.[8]

10. As was noted in BPC's Regulation 19 submission, Capstone Valley forms part of a natural break in development. The Council's own evidence in previous Local Plan iterations (including the 2003 Plan and 2012 Core Strategy evidence base) recognised its function in maintaining landscape distinctiveness between urban settlements. The Council's own 2024 Landscape Character Assessment describes LCA D3, land around Capstone Farm Country Park, as "a valuable rural landscape" and "an open area that helps retain a sense of separation between Hempstead and Princess Park/Wayfield."[9] The submission Plan itself notes at 4.7.2 that "Land in the connecting countryside close to the Kent Downs, in areas such as the Capstone Valley, reflect features of the designated landscape."

11. In seeking to place major development in this highly sensitive landscape, the Council is not acting consistently with the position it has always previously taken with respect to Capstone Valley.

12. The SA does state that "In the absence of a landscape sensitivity or capacity assessment, it is necessary to adopt a precautionary approach and consider the potential for adverse impacts on the National Landscape."[10] However, there is no evidence that the Council

---

[6] SA Volume 1 (A3.1), page N39.

[7] Ibid.

[8] C2.4.2 Interim SA (2024, D.5.5.1 ("*Some 17 strategic sites lie outside of the Sensitivity and Capacity study area. The potential effect of each of these sites on landscape capacity is therefore uncertain at this stage, and would need to be informed by site-specific assessments*.")

[9] B7 LCA, p 287.

[10] A3.2 Volume 2, p 131.

has adopted such a precautionary approach. A truly precautionary approach would involve further landscape work or the removal of these allocations from the Plan.

Coalescence and conflict with Policy S4

13. As is clear from the 2024 LCA, LW8 would erode the open land between Lordswood and Hempstead.[11] Together with LW4, it would bring about the effective joining of those two settlements. Policy S4 requires the separation of settlements to be retained. The allocations are therefore internally inconsistent with the Plan's own strategic policy. That inconsistency goes to the soundness of the Plan as a whole.

13.81 Are the green infrastructure requirements sufficiently clear and deliverable?

Summary answer

14. No. The requirements are neither clear nor shown to be deliverable.

15. The Concept Plan (Figure 13) in the submission draft gives no indication of the scale or alignment of the green infrastructure corridors, or how they would relate to built development on LW4 and LW8.[12] The supporting text accepts that it "would not be possible to deliver all of the required natural and semi-natural open space on-site due to the scale of development."[13] Most of that open space is instead to be provided off-site at Darland Farm.[14]

16. LW8 would sever the green corridor from Darland Banks to the Kent Downs National Landscape at Bredhurst and Boxley, and would threaten ground-nesting birds, including the red-listed skylark. Without a masterplan covering both Capstone Valley and Lidsing, there is no mechanism by which strategic corridors could be secured across the administrative boundary.

[11] B7 LCA, p 287, p 310.

[12] Page 273, 14.8.8.

[13] Para 14.8.4.

[14] Paras 14.8.4-14.8.5.

13.84 Is there sufficient capacity within the local highway network to accommodate the scale of development proposed?

Summary answer

17. The transport evidence does not demonstrate that LW4 and LW8 can be accommodated on either the local or the strategic road network. These allocations are reliant upon infrastructure designed to support an allocation in another local authority's development plan (Lidsing Garden Village). The Council's proposed interim solution is uncertain in terms of both feasibility and costings. See further:

    a) BPC's submissions under Matter 9.

    b) Mr Russell's transport-related submissions below.

13.87 Have cumulative impacts with other allocations been fully assessed? / 13.162 Is the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character and infrastructure provision and public services adequately understood and addressed?

Summary answer

18. No. Taken together, LW4, LW6, LW7 and LW8 and the Lidsing development amount to some 6,000 homes. Their cumulative effects have not been assessed robustly.

19. Sites allocated in the Medway Local Plan 2041, including LW4 and LW8, would "exacerbate the delays and capacity" at M2 Junction 3 to the M2 and on the A229 approach.[15] Accordingly, National Highways required more detailed analysis of cumulative impacts at M2 Junction 3, taking account of the removal of queues once the Junction 4 mitigation is in place.[16] The subsequent analysis assumes that Junction 4 is delivered.[17] The cumulative impacts in the scenario where Lidsing does not come forward have therefore not been adequately considered.

[15] MLP/ED20, para 2.4.5.

[16] MLP/ED20, para 2.4.8.

[17] MLP/ED20, paras 2.4.4-2.4.6.

20. Adverse air quality impacts on the North Downs Woodlands SAC have also been identified in the Habitats Regulations Assessment for the Plan. This remains under discussion with Natural England.[18] The Maidstone modelling, which demonstrated that adverse effects could be avoided, relied on the Lidsing East-West Link Road and on traffic calming on Boxley Road/Lidsing Road.[19] The Council's proposed main modification to Policy SA7 only restates the requirements of the Habitats Regulations.

13.89 Are there any significant viability, land ownership or deliverability constraints?

Summary answer

21. Yes. For the reasons set out above, there are significant and unresolved deliverability constraints, such that the site-specific allocations within Policy SA7 are not deliverable within the anticipated timescales set out in the housing trajectory.

13.91 Is Policy SA7 overall positively prepared, justified, effective and consistent with national policy?

Summary answer

22. No. For the reasons above, Policy SA7 is not justified or effective, and it is not consistent with paragraphs 115 and 116 of the NPPF insofar as it relates to LW4 and LW8.

23. Because the Plan's housing supply relies on up to 3,958 homes in the Capstone Valley, the deficiencies identified above and in BPC's Matter 9 submissions have implications for the soundness of the Plan as a whole. The Plan as currently drafted depends on infrastructure that is uncommitted, unfunded and outside the Council's control.

Conclusion

24. The evidence does not show that LW4 and LW8 can be delivered without severe residual cumulative impacts on the road network, in all reasonable future scenarios, including the scenario in which Lidsing is delayed or does not come forward.

[18] MLP/ED20, para 2.5.7.

[19] Ibid.

Nor does it show that they can be delivered without unacceptable harm to landscape character and settlement separation. The allocations are unsound and should be deleted.

ALEX SHATTOCK

Landmark Chambers

26.10.26

1.1 This response has been prepared on behalf of **Boxley Parish Council ("BPC")** for the Examination of the Medway Local Plan 2041.

1.2 This response addresses the transport-related questions raised under **Matter 13 in relation to Policy SA7** (Capstone Valley). This response forms part of BPC's Hearing Statement, alongside its general submissions on soundness and other matters.

1.3 This response should be read alongside Boxley Parish Council's submissions on Matter 9 (Transport) which are also relevant to Policy SA7 and are cross-referenced where appropriate.

1.4 This response is prepared by Mr John Russell, who is a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT). Mr Russell holds an Honours Degree in Civil Engineering and is a Director of JR Transport Planning Limited, a consultancy that specialises in transport planning, traffic engineering and highway design.

13.76 – What evidence demonstrates that the scale of development proposed (up to 3,958 new homes) within Capstone Valley is justified having regard to the spatial development strategy and reasonable alternatives?

1.5 It has not been clearly demonstrated that the scale of development proposed at Capstone Valley is justified having regard to the spatial development strategy, reasonable alternatives and the transport infrastructure required to support it.

1.6 The allocation of up to 3,958 homes (almost 10,000 people) would fundamentally change the character and transport demands of an area that is currently rural in nature and served by rural lanes. The existing highway network is not designed to accommodate development on this scale and cannot do safely and efficiently.

1.7 There is currently no public transport provision serving the area. Walking and cycling rely substantially on the existing rural lanes, where relatively low traffic levels form an important part of the present environment. These conditions will significantly change following development on the scale proposed. A substantial increase in traffic would make the use of these lanes by pedestrians and cyclists unattractive and unsafe. It has not been demonstrated how a comprehensive and safe active travel network, or viable public transport services, would be provided to serve the development from its early phases. Without such provision, residents would be dependent on private cars for many journeys, increasing pressure on an already constrained highway network.

1.8 Of particular concern is the reliance on improvements to M2 Junction 4 and associated highway links serving the proposed Lidsing Garden Community (LGC) in neighbouring Maidstone (see BPC submissions on Matter 9). These works are outside Medway's administrative area and are not within the direct control of Medway Council. Their delivery depends on decisions, funding, approvals and

development progress in another local planning authority area. Although the works may be anticipated in the wider development strategy, their delivery in a plan aligned manner cannot be controlled by the Council.

1.9 It has therefore not been demonstrated that the allocation can be accommodated safely and sustainably if these cross-boundary works do not proceed, or that a deliverable alternative would be available. The Sustainability Appraisal and Strategic Transport Assessment should demonstrate that the scale and location of growth are justified against reasonable alternatives, taking account of the existing absence of public transport, the limitations of the rural lane network and the consequences of non-delivery of the proposed M2 Junction 4 improvements.

13.83 – What transport evidence supports the allocation?

13.84 Is there sufficient capacity within the local highway network to accommodate the scale of development proposed?

13.85 What highway mitigation measures are required and how will they be funded and delivered?

13.88 How will infrastructure provision relating to Policy SA7 be phased alongside development?

13.89 Are there any significant viability, land ownership or deliverability constraints?

1.10 I refer to BPC's Hearing Statement for Matter 9 which also addresses these questions and is not repeated here.

1.11 Although a Strategic Transport Assessment and supporting transport evidence have been provided, it has not been demonstrated that all material concerns regarding cumulative highway impacts, available capacity, sustainable travel, mitigation and infrastructure delivery have been resolved. These matters are closely interrelated and are particularly significant because Capstone Valley (SA7), comprising up to 3,958 homes, depends on strategic highway improvements, including the proposed east-west Link Road and improvements to M2 Junction 4, alongside substantial investment in walking, cycling and public transport.

1.12 Without the east-west Link Road and the necessary junction improvements, Capstone Valley risks being left as a development in a poorly connected location, where many everyday journeys will be difficult to make by active travel modes and where existing public transport provision is absent. In those circumstances, a substantial shift away from private car use would depend on the delivery of infrastructure and services that have not yet been demonstrated to be sufficiently comprehensive, funded or secured. This raises a wider question as to whether the allocation's transport strategy is realistic as a whole: the proposed housing growth, the strategic highway network and the sustainable transport measures need to function together, rather than being treated as separate interventions whose eventual delivery can be assumed.

1.13 The Council's *Medway Local Plan 2041 – Transport Evidence Base: Mode Share Strategy (Stage 3)* recognises that achieving sustainable travel depends on the location of everyday facilities and the provision of appropriate walking, cycling and public transport infrastructure.

1.14 These principles are particularly relevant to Capstone Valley. Given the location of the allocation in relation to existing facilities, many everyday journeys are unlikely to be realistically walkable. The proposed scale of development could potentially support local facilities, but that depends on those facilities being provided in appropriate locations and at the right time, and being accessible from the homes they are intended to serve. The allocation's scale alone does not demonstrate that a functioning local centre or a sufficient range of everyday services will be delivered.

1.15 With no existing public transport provision serving the site, a substantial shift away from private car use would also depend on a viable public transport service and safe, direct walking and cycling connections to surrounding settlements and destinations. The Stage 3 strategy identifies broad interventions across Medway, including Local Cycling and Walking Infrastructure Plan routes, the internalisation of trips through the co-location of homes, jobs and facilities, and Bus Rapid Transit in specified growth areas. However, the strategy does not, in itself, establish the infrastructure strategy required for Capstone Valley, the extent of off-site walking and cycling improvements, the public transport service to be provided, or the cost, funding and delivery arrangements for those measures. Nor does it clearly establish that the proposed Bus Rapid Transit strategy will serve SA7.

1.16 The absence of a demonstrated, comprehensive sustainable transport solution is particularly important when considered alongside the uncertainty over the east-west Link Road and M2 Junction 4 improvements (see submissions under Matter 9).

1.17 If the strategic highway connections are delayed or do not proceed, the development could generate substantial additional traffic on the existing road network while residents remain dependent on cycling and public transport alternatives that have not been shown to be sufficiently developed or deliverable. Conversely, the provision of a east-west Link Road and junction improvements alone would not establish that the development would achieve a sustainable mode share. The Plan needs to demonstrate how the road network, local facilities, public transport and active-travel routes will operate together to provide a realistic alternative to private car use.

1.18 Whilst it is recognised that new development will contribute towards walking, cycling and public transport improvements, the question is whether in relation to SA7 they would be sufficient to overcome the locational disadvantages of the site and are deliverable at the scale and pace required in particular to and from the SA7 area.

1.19 In the absence of the strategic road connections and a secured sustainable transport network, car use will remain the default for many journeys. That would undermine the mode-share assumptions on which the transport strategy relies and would place further pressure on the existing highway network, rather than resolving the impacts of the proposed development.