

Medway Local Plan Inquiry – Hearing Statement

Matter 6: Natural Environment

Statement by Ray Dines

1. Introduction

I have lived in Lordswood since 1979 and worked for approximately 20 years as a Senior Transport Planning Manager with Kent County Council. More recently, I have supported Bredhurst and Boxley Parish Councils in their consideration of planning and highway matters, including the Maidstone Local Plan.

During my professional career, I gave evidence on behalf of the County Council at public inquiries relating to local plans and major transport schemes.

This statement focuses on the Inspector's Matter 6 questions concerning the Natural Environment, with particular reference to the proposed housing allocations LW4 and LW8 in the Capstone Valley.

My overall position is that the evidence base does not currently justify the allocation of LW4 and LW8 because the Local Plan has not demonstrated that these sites can be delivered consistently with its policies on climate change, landscape, biodiversity, green and blue infrastructure, and protected habitats.

I therefore ask that LW4 and LW8 are either deleted from the Plan or deferred until the Council has provided robust and site-specific evidence and Policies to demonstrate that the allocations are sound.

2. Response to Inspector's Questions

Policy S1 – Planning for Climate Change

Question 6.1

Whole-life carbon emissions will be influenced by many factors including the construction phase and the long-term decommissioning/demolition process. The Sustainability Assessment Volume 2, paragraphs 9.1.5 to 9.1.9 describe the components of Carbon Emissions at the various stages of the development. The topography of the sites will be relevant in both the construction and operational phases of the development.

Site allocation LW6 (East Hill) is a good example. The ongoing development here has required the stripping of topsoil and vegetation and the creation of terraced development platforms involving significant earthworks. This will result in higher Carbon Emissions as compared to a more level site.

The proposed housing allocations at LW4 and LW8 raise similar, and potentially greater, concerns. The allocations rely on the concept plan (Figure 13) of the Draft Local Plan, paragraph 14.8.8, but that plan does not demonstrate how development, green corridors, access arrangements, gradients, walking and cycling routes, or public transport infrastructure can be reconciled.

In particular, the proposed connections to Ham Lane and Capstone Road appear impractical given their existing rural character and width constraints. Furthermore, the gradients of the sites will not encourage pedestrian or cycle usage.

The concept plan therefore does not provide a sound basis for assessing either carbon emissions or sustainability.

Policy S1 is intended to support sound site selection and strategic option testing, but the current Policy does not provide an effective mechanism for comparing the whole-life carbon emissions of specific allocations. This weakness is carried forward into the Sustainability Assessment.

Question 6.3

Policy S1 does not provide sufficient contingency for uncertainty around viability or infrastructure delivery.

Site allocations LW4 and LW8 depend on major off-site infrastructure, including an east-west orbital bus route and improvements to M2 Junction 4 associated with development at Lidsing. However, there is no clear evidence that these schemes are deliverable within the Plan period.

Without that certainty, the allocations cannot be relied upon to deliver a genuinely sustainable pattern of development. Policy S1 should therefore be modified so that carbon and sustainability assumptions are tested against realistic delivery scenarios, rather than against infrastructure that may not come forward.

Policy S2 – Conservation and Enhancement of the Natural Environment

Question 6.8

The emerging Nature Recovery Strategy is highly relevant to the proposed allocations in the Capstone Valley.

Paragraph 4.3.2 refers to the North Kent Downs Biodiversity Opportunity Areas, but these areas are not defined in the Plan. Policy S2 also overlaps with Policies S5 and S6, particularly because paragraph 4.5.13 says the Nature Recovery Strategy will inform green and blue infrastructure proposals.

Figure 2, at paragraph 4.6.5, is unclear and poorly defined, but it appears to conflict with the proposed housing allocations LW4 and LW8. The Plan does not adequately explain

how strategic housing allocations in the Capstone Valley can be reconciled with these natural environment objectives.

The supporting text to Policy S6 is also relevant. Paragraph 4.7.2 states that land in the connecting countryside close to the Kent Downs, including areas such as the Capstone Valley, reflects features of the designated landscape. Paragraph 4.7.7 further reinforces the importance of the Capstone Valley to the setting of the Kent Downs National Landscape and Capstone Country Park.

There needs to be much greater clarity and consistency between the Local Plan policies, the site allocations, the Nature Recovery Strategy, and the proposed green and blue infrastructure network.

As far as I am aware, the only Green and Blue Infrastructure Plan before the Inquiry is Document C2.7, dated July 2024. Nothing in that document appears to support the conclusion that LW4 and LW8 are appropriate allocations. Plan 23 (page 90) confirms the importance of the Capstone Valley as a green corridor linking Capstone Country Park with the Kent Downs National Landscape.

Question 6.12

Air quality impacts on the North Downs Woodland SAC were a significant issue in relation to the Lidsing development at the Maidstone Local Plan Inquiry.

A toolkit of possible mitigation measures was identified, but the management of traffic flows on Boxley Hill was primarily linked to the provision of an east-west link and major improvements at M2 Junction 4.

There is currently no certainty that these schemes, or equivalent mitigation measures, will be delivered. Boxley Hill remains the shortest route between Lordswood and Maidstone, and additional traffic from LW6, LW4, LW8 and LW7 is likely to increase pressure on routes affecting the SAC.

The Plan therefore does not provide sufficient certainty that the combined air quality effects of these allocations and the Lidsing development can be properly mitigated.

Policy S4 – Landscape Protection and Enhancement

Questions 6.21 and 6.22

Paragraph 3 of Policy S4 is important because it reflects the long-standing objective of preventing the coalescence of settlements such as Lordswood and Hempstead.

The Medway Local Plan 2003 paragraph 3.4.107 (xi) and Policy BNE 34 set this objective and it is still relevant today. It is also a key consideration in the LUC Medway Landscape Assessment, June 2024, particularly in relation to Character Areas D3 and D4, pages 291–314.

The Sustainability Assessment itself recognises this uncertainty. Volume 1, page N39, states (in bold type): **“uncertainty remains in regard to the impact of allocations in the Capstone Valley on the setting of the NL in the absence of specific landscape sensitivity / capacity assessment covering this area”**.

This is a significant soundness issue. In the absence of a specific landscape sensitivity and capacity assessment for the Capstone Valley, the Council has not demonstrated that LW4 and LW8 are justified or consistent with the Plan’s own landscape protection Policies.

Policy S5 – Securing Strong Green and Blue Infrastructure

Questions 6.25–6.30

Please see my response to Question 6.8 above.

The nature, scale and deliverability of the proposed green and blue infrastructure network are not sufficiently defined. There is a conflict between the proposed green corridors and the strategic housing allocations in the Capstone Valley.

The Plan needs to demonstrate how LW4 and LW8 can be developed without undermining the function of the Capstone Valley as a landscape, biodiversity, recreation and green infrastructure corridor. At present, that evidence has not been provided.

3. Conclusion

For the reasons set out above, I do not consider that the proposed allocations LW4 and LW8 have been justified by proportionate evidence. This stems in part from poorly defined and overlapping Policies S1 -S6.

The Plan does not demonstrate that the proposed Strategic Housing allocations are consistent with its policies on climate change, natural environment protection, landscape, green and blue infrastructure, or protected habitats. The questions raised here under the Inspector’s Matter 6 will also be relevant to Matter 1 (Legal Compliance and Procedural Requirements) particularly the Inspector’s questions 1.4 and 1.6.

I therefore ask the Inspector to recommend that LW4 and LW8 are deleted from the Plan, or otherwise deferred until the Council has provided robust, site-specific evidence and Policies relevant to landscape capacity, biodiversity, infrastructure delivery, transport sustainability and whole-life carbon impacts.

Ray Dines

23 August 2026