*Post or hand deliver this representation to:*

*MC/26/0001*
*Local Planning Authority*
*Medway Council*
*Gun Wharf Dock Road*
*Chatham*
*Kent*
*ME4 4TR*

*Email this representation to:*

*planning.representations@medway.gov.uk*
*Quote "MC/26/0001" in the subject line.*

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## Representation in response to MC/26/0001

Dear Local Planning Authority,

This representation **OBJECTS** to Catesby's planning application MC/26/0001 (to build 350 dwellings on land off Stoke Road in Allhallows) on fundamental legal and planning grounds. Read against planning policy and other material considerations, the scheme conflicts with the development plan, including the Medway Council Local Plan (2003), and key provisions of the National Planning Policy Framework (December 2024).

### 1) Transport & Access (Highway safety, capacity, and cumulative impacts)

**1A. The development would materially increase traffic on roads that are currently low-flow, rural in character, and constrained.** The applicant's Transport Assessment (TA) forecasts 174 vehicle trips in the AM peak hour (08:00–09:00) and 165 in the PM peak hour (17:00–18:00) for the 350 homes, plus 1,527 two-way trips across 07:00–19:00. The TA also records existing Stoke Road flows of under 1,000 vehicles per day (via speed survey counts). This implies the scheme could more than double traffic on Stoke Road and change its character and safety risk, yet the TA describes peak impacts as "negligible". That conclusion is not credible on the face of the applicant's own numbers.

**1B. The TA assessment scope is too narrow and risks under-estimating impact. Key concerns include:**

- Assessment year and "worst case": the TA models to 2030 only. That may not represent full build-out, nor the realistic "in-combination" position alongside any potential other growth planned/coming forward in the Medway Council area. A longer horizon and/or full build-out assessment is required.
- Cumulative effects: the junction list/modelled network is limited. I am concerned about the wider corridor effects (including queue displacement and rat-running), not just a small number of junction capacity outputs.
- Trip generation omissions: the TA is framed around the residential element, but the application also includes a children's day nursery and other non-residential elements (e.g., burial/memorial uses and a mobility hub referenced in the application description). These will generate additional and differently timed trips (drop-off/pick-up peaks, visitors, servicing) that should be transparently quantified and assessed.

**1C. Access arrangements and local road safety risk are not properly resolved.** The TA proposes three priority junction accesses from Stoke Road and references local carriageway widening to address vehicles overrunning the verge. The need for verge-overrun mitigation itself indicates constraints and existing operational issues. I am concerned about:

- Conflict between faster moving traffic and turning movements at new priority junctions (and cumulative turning movements across multiple new accesses).
- Construction traffic using constrained routes, creating safety risks and unacceptable disruption unless tightly controlled and enforced through a robust Construction Traffic Management Plan.
- Emergency access reliance: an "emergency access from Binney Road" is described as possible; I am concerned this could become operationally relied upon, increasing pressure on an already constrained route.

**1D. The scheme risks worsening school-run congestion and safety.** The TA notes school-related bus services and that existing children use local services for secondary school. With up to 350 homes (and a nursery), there is a high likelihood of increased school-run car trips, short-stay stopping/parking, and conflict near routes to schools and bus stops. The applicant has not demonstrated how these impacts will be avoided or mitigated in a secured and enforceable way.

**1E. Conclusion on Transport & Access:** For the reasons above, the applicant has not demonstrated (to the required standard) that the highway network has adequate capacity, that impacts are acceptable in-combination, or that safe and suitable access can be achieved without unacceptable harm.

**2) Active Travel (Walking, cycling, public transport realism)**

**2A. The applicant's own baseline demonstrates poor, discontinuous pedestrian infrastructure and limited scope to fix it. The TA acknowledges:**

- Binney Road has no designated footway along the site's northern boundary and is shared with vehicles.
- Footways around Stoke Road are discontinuous, and the TA explicitly notes there are "very limited opportunities to introduce continuous footways" along certain key sections.
- This undermines any claim that the site is well placed for safe, attractive everyday walking (including for children, older residents, and disabled people).

**2B. Cycling connectivity is weak and does not meet modern "safe, direct, coherent" standards.** The TA identifies the nearest National Cycle Network route as NCN 179, accessed around 6km away. That is not practical for everyday utility cycling from this site without safe links. I consider that:

- Cycling would be suppressed by road speeds, lack of protected infrastructure, and severance points; and
- Reliance on "encouragement" measures is not a substitute for delivering safe infrastructure first.

**2C. Bus provision is limited and not a reliable basis for claiming "sustainable location".** The TA lists services (including school services and an hourly service pattern on parts of the corridor) and refers to "initial discussions" about possible enhancements. However:

- Some services are school-specific (not general all-day access).
- The offer appears uncommitted (no secured funding, no guaranteed timetable uplift, no binding triggers).
- In practice, the level of service does not provide a realistic alternative to the private car for many daily trips (work, healthcare, shopping, leisure), especially at evenings/weekends.

**2D. The Travel Plan targets are not credible without deliverable infrastructure and enforceable commitments.** The Travel Plan uses 2011 Census mode share as a baseline and proposes a staged reduction in car-driver share. But without:

- continuous footways / crossings,
- safe cycle routes to key destinations,
- guaranteed bus service improvements, and
- effective parking restraint,

the "mode shift" reads as aspirational rather than deliverable.

**2E. Conclusion on Active Travel:** The development's active travel offer is not genuinely safe, inclusive, or convenient, and does not meet the policy expectation that growth should be focused in locations that reduce the need to travel by car.

**3) Environment & Ecology (designated sites, protected species, disturbance)**

**3A. Proximity to internationally important habitat sites is exceptionally tight.** The applicant's Ecological Impact Assessment identifies internationally important designated sites in the immediate vicinity, including the Thames Estuary and Marshes SPA/Ramsar at approximately 50m from the closest point (with additional designated sites within 6km). The Medway Council Local Plan (2003) recognises these international sites as critical environmental assets.

**3B. The applicant's HRA information confirms likely significant effects and the need for Appropriate Assessment.** The applicant's Habitats Regulations information states that screening identifies likely significant

effects (e.g., construction dust/noise, water quality effects, and recreational disturbance) requiring mitigation and an Appropriate Assessment. Under the NPPF, the presumption in favour of sustainable development does not apply where significant effect on a habitats site is likely unless AA concludes no adverse effect on integrity. I object because, at present, it has not been robustly demonstrated that the scheme will avoid adverse effects, particularly given the very close distance to sensitive habitats and bird populations.

**3C. Recreational pressure and dog-walking impacts are a core unresolved risk.** With 350 homes, the increase in residents (and dog ownership) is likely to intensify use of nearby marshes, sea walls, PRoW and the Coast Path - areas that support sensitive wintering and passage birds. The applicant points to strategic mitigation contributions (SAMMS), but I am concerned this:

- may not adequately address localised, site-specific pressure created right next to the designated complex; and
- requires clear, enforceable delivery (triggers, indexation, monitoring, and long-term management) before any consent could be considered lawful.

**3D. On-site habitats and species constraints require greater weight and certainty.** The EcIA identifies on-site hedgerows and arable margins as habitats of principal importance, and recognises proximity to extensive grazing marsh habitat. The EcIA also indicates risks/potential presence for protected species/groups (e.g., bats, reptiles, and great crested newt assumed low numbers). I object because:

- mitigation is often deferred to later documents (CEMP / LEMP) rather than secured design-led avoidance now;
- lighting, noise, domestic pets and edge effects can create persistent disturbance beyond the red line; and
- "net gain" claims must be supported by deliverable, legally secured habitats and management - not just metrics.

**3E. Light pollution is a material ecological and amenity harm risk.** Given the rural/coastal context and proximity to sensitive habitats, I am concerned about increased artificial light affecting wildlife movement and bird behaviour and eroding dark skies/tranquillity. The NPPF requires limiting light pollution impacts on intrinsically dark landscapes and nature conservation.

**3F. Conclusion on Environment & Ecology:** The application has not shown (to a legally robust standard) that harm to designated sites and protected ecological receptors can be avoided, adequately mitigated, and (where needed) compensated, with certainty and enforceability.

**4) Landscape & Visual (character, settlement edge, views and receptors)**

**4A. The applicant's LVIA identifies significant adverse effects for local receptors - this is not a "minor" or "neutral" landscape change.** The LVIA's own summary table identifies:

- Moderate adverse effects on the "site and its immediate context" landscape character; and
- For visual receptors, Major–moderate adverse long-term effects in locations on the edge of the settlement (local residents most directly affected), and Moderate adverse effects for receptors along parts of the Stoke Road corridor (depending on location).

I object because these findings point to a scheme that would cause material landscape/visual harm rather than being comfortably absorbed.

**4B. Settlement edge expansion and erosion of rural/estuarine setting.** The proposal would extend built form into a sensitive transition between village edge and open marsh/estuary landscape. Even if some views are "in the context of existing settlement," the change represents:

- a permanent outward shift of the settlement edge;
- increased built mass and domestic paraphernalia (lighting, fences, vehicles); and
- greater visual influence from public routes, including longer-distance recreational paths.

**4C. Over-reliance on planting to "fix" harm later.** The LVIA relies heavily on proposed planting to reduce effects "in the long term." I object because:

- planting takes many years to mature and cannot be assumed to succeed uniformly;
- early and medium-term harm (during construction and establishment) is a real and relevant planning impact; and
- winter views and night-time effects can remain significant even after landscape mitigation.

**4D. Conclusion on Landscape & Visual:** The LVIA demonstrates that the proposal would generate unacceptable adverse landscape and visual effects for local residents and the rural/coastal setting, conflicting with the policy objective to protect valued landscapes and local character.

For the reasons and conclusions set out above, the application should therefore be **REFUSED**.

Thank you and kind regards,

**Name:** **Telephone:**

**Address:** **Email:**

**Date:**