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Frindsbury Extra Parish Council Representation in response to Medway Council's Regulation 19 pre-submission draft Local Plan.

Dear Local Planning Authority,

Frindsbury Extra Parish Council (FEPC) writes on behalf of the communities of Wainscott, Frindsbury, and Upnor in response to the draft Local Plan consultation and wishes for our representation to be passed to the Independent Inspector when the plan is submitted. We would also like to express our wish to participate in any future hearing sessions.

The Parish Council acknowledges the importance of Medway Council adopting a comprehensive Local Plan and, in principle, supports the development of such a framework. However, in its current form, the draft raises significant concerns in several key areas including housing provision, infrastructure funding, healthcare capacity, air quality, highways, and education. These unresolved issues call into question whether the plan is legally compliant and whether it can be considered 'sound'.

Noted below are sections of the Local Plan the Parish Council feel are not legally compliant or sound and wish for our representations to be considered.

Funding

Upon reviewing the overall Regulation 19 proposal, it is evident that significant early-stage capital investment will be required to deliver the necessary infrastructure, educational, and community facilities to support the development. However, the plan lacks clarity regarding how and where these essential funds will be sourced.

While it is apparent that housing development will rely on Section 106 contributions, this alone will be insufficient. Assuming a contribution of £20,000 per housing unit, the total secured through Section 106 could be approximately £490 million. This figure falls substantially short of what is required to deliver the full scope of infrastructure needed for the Hoo Peninsula and surrounding areas. Furthermore, there is little information on how other development proposals will be funded.

The plan relies heavily on ongoing discussions between Medway Council and central government to secure funding for infrastructure, highways, education, and community services. However, given the current economic climate, there is no guarantee that central government will commit the necessary financial support. Moreover, Medway Council is not in a financial position to forward-fund the critical infrastructure required to enable both existing and proposed housing and employment allocations, which are essential to delivering a sustainable and viable environment.

In conclusion, the delivery of housing over a 15-year period means that Section 106 funding will be delayed and will not be available in time to support the early delivery of key infrastructure. In the absence of a clear and committed funding strategy, the plan cannot be considered sound or deliverable.

14.7 Strood West

This proposal to turn green belt land into a housing development appears to be advanced on the assumption that Gravesham Borough Council will bring forward regarding Chapter Farm, land that sits in

Gravesham to the west of Gravesend Road as a residential development allocation, thereby justifying the release of adjoining Green Belt land. However, residents of Medway have contacted Gravesham councillors seeking clarification on the status of Chapter Farm, and in most cases have been informed that no final decision has been made and that the allocation is unlikely to proceed.

Given the current uncertainty, Frindsbury Extra Parish Council strongly recommends that until such time as Gravesham formally allocates Chapter Farm for development, the adjacent land within Medway should continue to be considered as serving a significant Green Belt function and be afforded full protection from development. The land within the Medway Council boundary is Grade 1 agricultural land and thus pursuing this site allocation without first looking for alternative sites, that are lower grade agricultural land or brownfield sites is a **contradiction the council's own Policy T14.**

Should Gravesham Council proceed with the allocation of Chapter Farm, and the proposed West Strood development also come forward, the Parish Council would expect to see substantial and deliverable highway infrastructure improvements as a precondition. Specifically, this includes major enhancements to the junction of the B2000 and the Wainscott Bypass, including the delivery of both an on-slip and off-slip road to and from the Medway Tunnel and the A2. These improvements are essential to prevent further traffic congestion and reduce the risk of "rat running" along Hollywood Lane—a route that has already been the site of serious accidents, including fatalities.

In additionto the above, the Parish would seek meaningful investment in local community infrastructure, including the provision of:

- New or enhanced playing pitches and recreational facilities such as a sports centre.
- Allotments and publicly accessible green spaces
- A new primary, secondary and Special Needs Provision which is severely lacking in the area.
- A full-time GP surgery, which is currently lacking in the Parish and will become critical as the local population grows

Although policy SA6 does mention the implementation of a primary and secondary provision no timeline has been given and given the current lack of school spaces in the Parish this would need implementing before any housing is considered. The Parish Council has approached local schools such as Wainscott Primary and Maritime Academy who have both confirmed they are at capacity every year for year 7, with Maritime having to take on an extra 60 pupils in the last year which they have confirmed they will not be able to accommodate again going forward. The Secondary provision will have to be large enough as villages such as Cliffe Woods and Cliffe will also need to be accommodated for as this would be their nearest secondary option as those children are currently being turned away from Maritime Academy due to distance, but it is their nearest secondary and the school being at capacity from local children in Strood and Wainscott. Also, no additional special needs provisions have been mentioned. The only local authority secondary special needs provision this side of the river Medway is Abbey Court but this provision is mainly for those with severe learning difficulties or profound multiple learning difficulties. A primary and secondary special needs provision is desperately needed in the area.

Finally, in accordance with the aspirations of this Local Plan, any development on this site must be of a high design quality and of a scale and density that is sensitive to its edge-of-countryside setting.

14.14 Frindsbury Peninsula Opportunity Area

Frindsbury Peninsula Opportunity area is located on the current Medway City Estate. Proposing to change from a business estate to establish a mixed-use regeneration area is noted, the proposed timescales towards the end of the Local Plan period are concerning. This prolonged horizon will likely leave existing businesses in a prolonged state of uncertainty, discouraging much-needed investment in both business operations and premises over the next 10 to 15 years.

In order for this proposal to have any realistic prospect of success, a far more significant catalyst will be required than the redevelopment of the Veetee sites alone. The scale of investment needed would demand substantial public sector funding either directly through Medway Council or a dedicated development corporation. However, given current financial constraints, it appears highly unlikely that Medway Council would be able to act as the principal driver of such a complex regeneration scheme.

Furthermore, the scale and location of the Hoo Peninsula may not meet the threshold required for government intervention through a national development corporation.

It has been suggested that Kingsnorth in Hoo, off the Four Elms Hill could serve as an alternative relocation site for displaced businesses. However, this location presents a number of disadvantages, including inadequate transport infrastructure, poor public transport links, poor air quality area and a relative disconnect from the main urban centres of the Medway Towns.

While parts of the existing estate may appear dated, it supports a wide range of business units and diverse uses, providing affordable premises for both established firms and new start-ups. These businesses make a valuable contribution to the local economy and benefit from proximity to the urban area, workforce, and customers.

There is also concern as no local facilities such as nurseries, schools or healthcare facilities have been mentioned in the document or policy SA13. Local schools such as Wainscott Primary and Maritime Academy have both confirmed to the Parish Council they are at capacity year on year with Maritime even taking on an extra 60 pupils in the last year which they have confirmed they will not be able to accommodate again going forward.

Frindsbury Extra Parish Council is therefore concerned that, without a clear, well-funded delivery framework and suitable relocation alternatives, this regeneration proposal risks displacing viable businesses, undermining local economic resilience, and leaving the area in prolonged decline. Should the council still want to pursue this policy then it is our view that the change of use to residential should start adjacent existing residential areas in Strood and Frindsbury in order to prevent ghettoisation. Thus, site allocations for residential areas should be better identified on the Urban Core Policy Map, showing an evolutionary change over the period of the Local Plan.

9 Transport

Neither the Infrastructure Delivery Plan (IDP) nor the Strategic Transport Assessment (STA) have been supplied as part of the consultation. Thus, it is difficult to make precise criticisms as there is not the information made available to do so. Again, it is not possible to critique the mitigation strategy, as we await the outcome of the Medway-wide Monitor and Manage Mitigation Strategy.

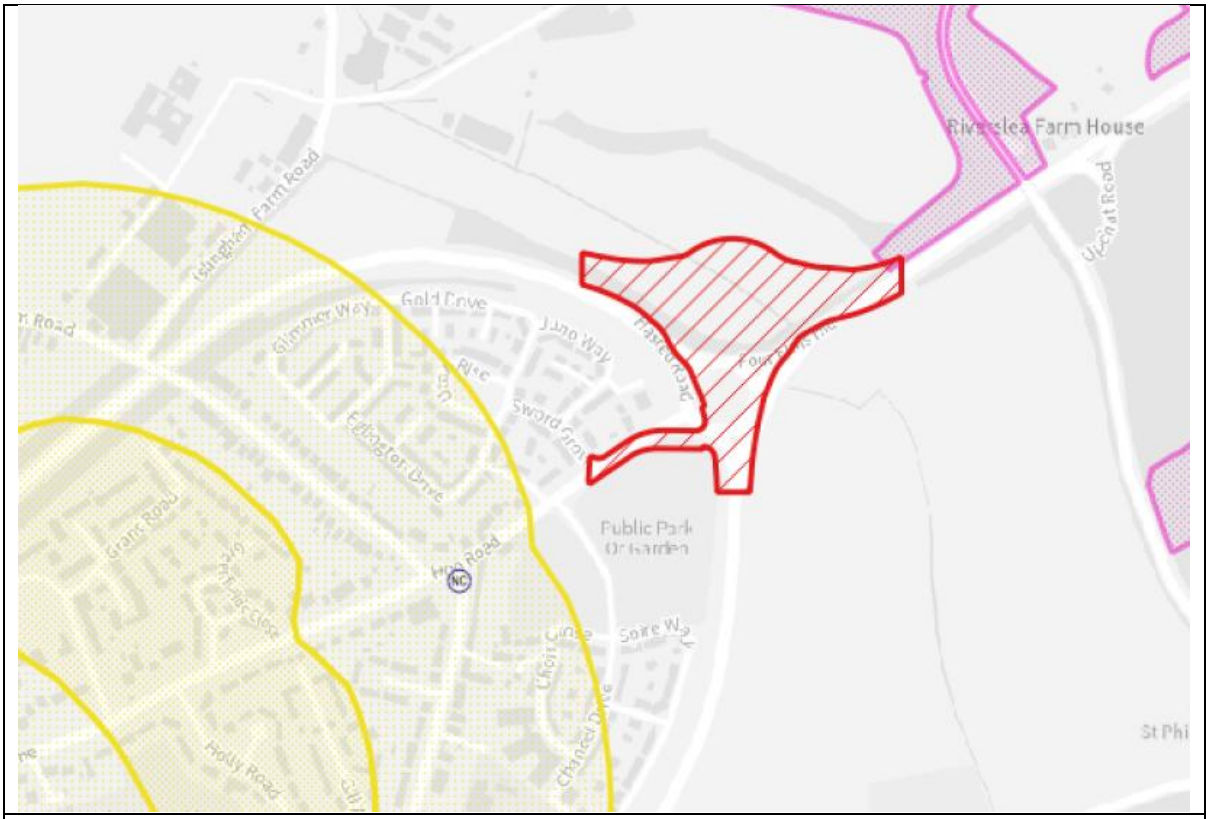
The two policy maps, the North West Policy Map and South West Policy Map, do not show future infrastructure plans, particularly upgrades to highways. This of particular concern as the A289 passes through FEPC, almost circumventing Wainscott. The dual carriageway is a vital east-west route north of Medway's main conurbations. The three roundabouts on the A289 within FEPC are regularly over capacitated at peak times. The traffic flows at these roundabouts needs to be improved, this would also assist in lowering air pollution. It is extremely disappointing as there have been numerous conversations over recent years for a slip road from the A289 up to A228 Four Elms Hill. Yet all that are shown are two safeguarding areas for future improvement of Four Elms and Sans Pareil roundabouts. However, we believe that the only way to significantly improve Four Elms Roundabout to facilitate current and projected growth, is to construct a grade separated junction. This may need to be also done at the Sans Pareil Roundabout, which does have the advantage of the natural form to permit a grade separated junction.

The South West Policy Map covers the more urban part of FEPC, however it does not show cycling routes nor improvements for public transport.

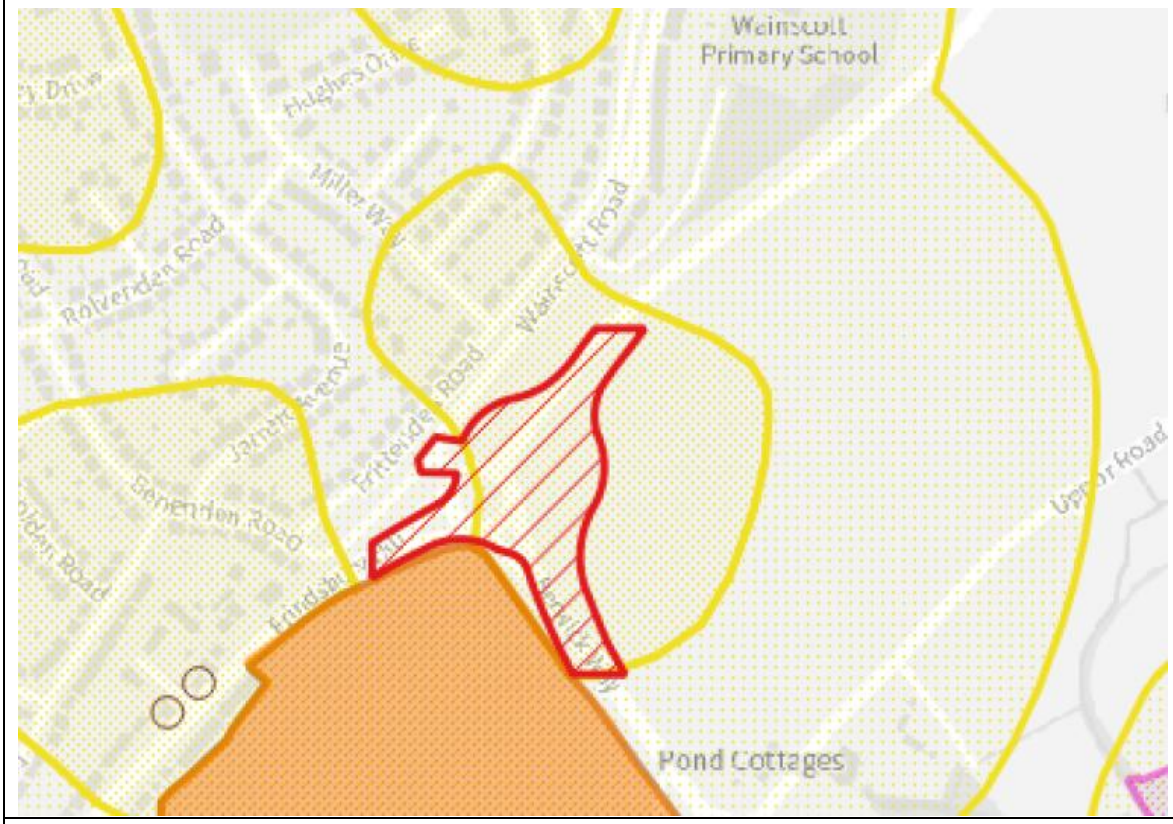
The IDP is mentioned in Policy DM15. The policy described how it is to be funded, but to as to what the plan contains is not available.

We remain firmly against the proposal to exempt urban centres from the managing and monitoring, as the areas need to comply with all the policies to even be given consideration for exemption.

We support the concept of providing a Bus Rapid Transit corridor, connecting Hoo St Werburgh and Strood town centre.



Extract from North West Policy Map showing the safeguarded area for a future enlarged Four Elms roundabout



Extract from South West Policy Map showing the safeguarded area for a future enlarged Sans Pareil roundabout

We support Policy DM18: Transport Assessments, Transport Statements and Travel Plans, but there needs to be more clarity on how the frameworks are setup and how the milestones are achieved for future projects.

10 Health, Communities and Infrastructure

The National Planning Policy Framework, a keystone in local plan development, addresses issues which a Local Authority must consider meeting the on-going health needs of the community. Of relevance from the policy document:

- Planning Policies and decision should aim to achieve healthy and safe places (p96)
- To ensure faster delivery of health infrastructure local planning authorities should work proactively with promoter, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues **before applications are made.**

Healthcare Infrastructure is an essential component of the Local Plan development, ensuring that new developments are supported by adequate healthcare facilities. Frindsbury Extra Parish Council are proactive in communicating with residents on many issues. We are currently drafting our Neighbourhood Plan. During these engagements the primary concern of our community is healthcare provision, mainly having only one hospital serving Medway and Swale. It is therefore with interest we have read Medway Infrastructure Delivery Plan specifically Section 3.5 Health and Social Care. In this it is stated that NHS Kent and Medway are currently undertaking a review of the proposed Local Plan growth in order to assess the impact on primary, community and acute healthcare. We would have expected this review to be available at this point in the consultation to shape the ongoing plan.

We would have also liked to see results on engagement direct with the PCN's as these consist of clinicians across the healthcare systems who can offer invaluable advice into community needs and how development is likely to affect them.

Other healthcare providers include Kent and Medway NHS and social care partnership trust. This trust provides a wide range of adult mental health and disability learning services for Medway residents. It is worth noting that whilst Medway residents use these services they must travel out of Medway to use them because they have no locations in within Medway. There is no increased provision or locations for social care in the plan.

Finally and most importantly Medway NHS Acute trust have themselves stated in the Medway Infrastructure Delivery Plan PG 63 states:
"Acute services are currently delivered from Medway Maritime Hospital in Gillingham, which serves Medway and some residents of Swale. Services are currently stretched and the **anticipated increase in the local population of both Medway and Swale will not be able to be accommodated within the existing infrastructure**."
There is nothing in this plan to mitigate this, or any of the other issues raised. Measures need to be put in place for the safety of current and future residents specifically in allocating a site for a second hospital for Medway and Swale which is desperately needed.

4.3 Conservation and enhancement of the natural environment and 4.4 Sites of international importance for nature conservation

The Parish Council was very disappointed that an extremely important and rare site is missing from the local plan document. A chalk stream which runs from Chattenden Woods down through Upnor and into the River Medway. There are just over 200 in the world. England has 98% of them and the other 2% are found in France which shares our chalk-based geology. Chalk streams are recognised by the World Wide Fund for Nature (UK) as having high conservation value.

The stream rises from a spring in Chattenden Woods, flowing from the junction of the clay beds then flowing over the chalk bedrock through Islingham Farm under Four Elms Hill dual carriageway, adjacent west side of Upnor and finally into White Wall Creek.

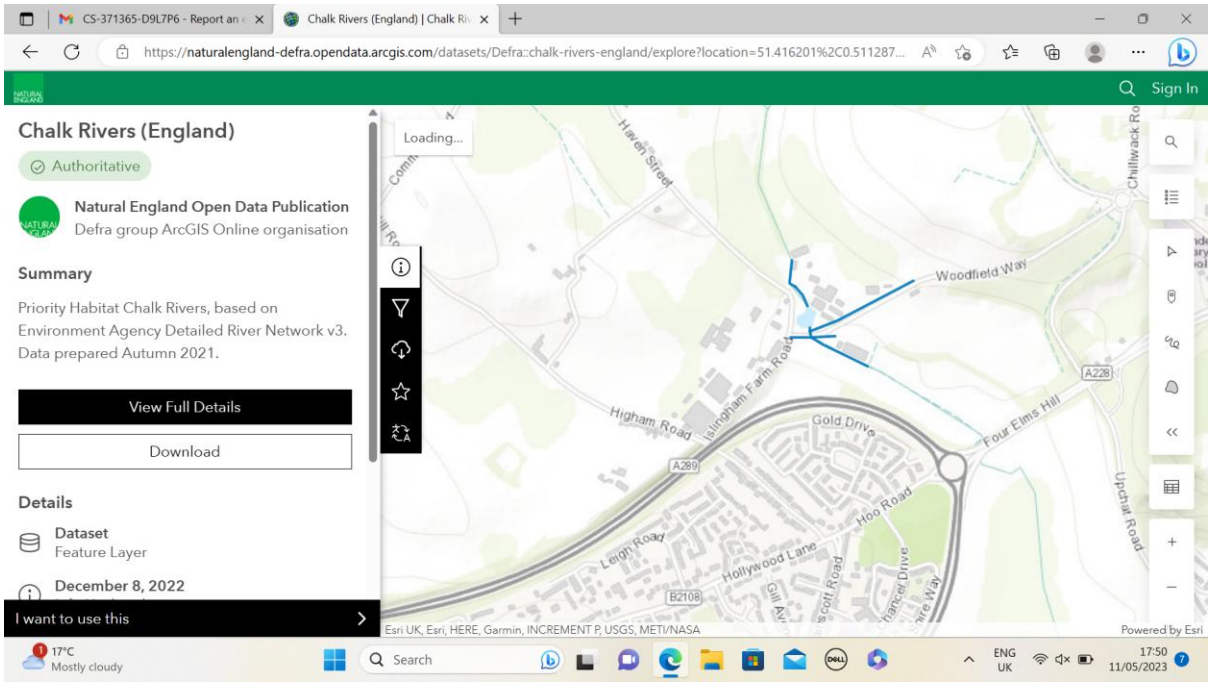
The Parish Council has been looking at how it could increase its profile within the community and promote local interest vital for its preservation. Any further developments close to the stream could damage or even destroy this unique habitat. The Parish worked alongside University of Greenwich to survey the lower part of the river. The study formed part one of their student's project for her degree course. The stream has not been subject to much conservation, only some removal of overgrowth when it has restricted its flow. Even this has damaged the riverbed and removed some of the environment that offers cover for small insect larvae which in turn would support larger animals and birds.

The Parish Council thought it would be worth investigating historical records to see if the stream had a name that was used in the past. The ordinance survey did not record such a name for the stream. There is mention of the stream throughout our local history dating back to Anglo Saxon times, but no name was found. The Parish Council spoke to several local people who grew up in the area including our local MP. There was a surprising response most local people said it was known as the River Wain. The Arethusa Venture centre when it was operating employed local people as its instructors and they regularly surveyed the stream and they too referred to it as the Wain.

The Parish Council contacted the Ordinance Survey and raised a query about the name of the stream. We had a very positive response and within a short time they agreed that they would document our local chalk stream on their maps as the River Wain.

The River Wain now has its own identity. It is also recognised as a chalk stream by Natural England and DEFRA and can now be included in the Local Plan regarding environmental conservation.

Map below showing River Wain has been registered as a chalk stream.



4.10 Air Quality

4.10.1 Clean air is an important factor in human, environmental and ecological health. Medway has areas of good air quality, which should be maintained, and areas with recognised poor air quality, which the Council seeks to improve. Areas of poor air quality are managed and designated by Air Quality Management Areas (AQMAs) to bring pollutant levels below national objectives. The Local Plan's strategic objectives aim to support people to lead healthy lives, and to prepare Medway for a sustainable and green future and managing air quality contributes towards these. The Local Plan recognises that air quality is an important consideration when making decisions with regards to future developments, transport, and pollution control issues.

Medway Council has acknowledged the existence of poor air quality within designated Air Quality Management Areas (AQMAs); however, it has not provided sufficient detail regarding the severity of the pollution in these areas. According to the World Health Organization's air quality guidelines, the recommended maximum concentrations for nitrogen dioxide (NO_2) are 25 µg/m^3 for the 24-hour mean and 10 µg/m^3 for the annual mean.

The table below, taken from the Kent Annual Air Quality Report 2024 and reflecting data from January to December 2023, presents annual mean NO_2 levels recorded on roads in and around the Frindsbury Extra Parish Council area. The data demonstrates that recorded levels significantly exceed the WHO

recommended thresholds—often by more than double—raising serious concerns about the health and environmental implications for local residents.

DT ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Mean: Raw Data
DT12 Frindsbury Road															
DT12	573865	169646	35.2		28.3	34.9		33.7			27.8	27.8		24.0	30.2
DT21 Spire Way															
DT21	574999	170882	23.6	27.0	19.9	22.4		19.7		21.2	19.3	21.2		16.3	21.2
DT22 Joy Lodge Four Elms															
DT22	575488	171616	37.6	37.6	26.0	31.9		27.2		29.7	22.3	42.2		28.3	31.4
DT49 Higham Road															
DT49	574554	171351	32.1		20.7										-
DT50 Higham Road															
DT50	574568	171357	36.6												-
DT51 Benenden Road															
DT51	574521	170426	27.2		25.1										-
DT52 Frittenden															
DT52	574562	170497	28.2												-
DT53 Four Elms Hill															
DT53	575924	171839	51.5			22.7									-
DT54 Four Elms Hill															
DT54	575970	171860	46.5		41.4	41.4		45.7		53.8	43.8				45.4

The proposal to introduce additional residential development in and around the A289 and Four Elms Hill—areas already experiencing dangerously poor air quality—poses a serious risk to the health and wellbeing of both current and future residents. This approach raises significant public health concerns, particularly given the existing exceedances of safe air quality thresholds.

Furthermore, the draft Local Plan and associated policy documents provide insufficient evidence of how Medway Council intends to mitigate the anticipated increase in air pollution, nor is there a clear indication of how such measures would be funded or implemented. This omission is particularly concerning in light of the Council's statutory duties.

Under the Environment Act 1995, local authorities are legally required to review and assess local air quality and take action where national air quality objectives are not being met. Failure to properly assess and mitigate the air quality impacts of proposed development may render the Local Plan unsound under the tests of soundness set out in national planning policy—particularly in terms of "justified," "effective," and "consistent with national policy" criteria.

4.10.2 Large, potentially polluting developments which generate a significant amount of vehicle movements have the potential to significantly affect air quality. Therefore, air quality impact assessments must be completed and mitigation measures provided, in accordance with local air quality guidance.

Two large-scale and potentially high-emission developments are proposed within the draft Local Plan—namely at Strood West and Medway City Estate. Both are expected to generate significant additional vehicle movements, which will further degrade air quality in an area already identified as having serious pollution concerns. Despite this, there appears to be no evidence that site-specific air quality assessments have been undertaken as part of the plan-making process.

Frindsbury Extra Parish Council strongly believes that, prior to allocating such sites for development, the localised impact on air quality and public health must be properly assessed. In this instance, the absence of such analysis raises serious concerns about the suitability and viability of these proposed developments within the Parish.

The Medway Air Quality Action Plan 2024 clearly identifies road traffic as the main source of nitrogen dioxide (NO_2) pollution in the area, particularly from major roads such as the A289 and City Way. While the Action Plan proposes several mitigation measures, including:

- Bus fleet electrification
- Implementation of Medway's Electric Vehicle Strategy
- Transitioning the Council's fleet to low-emission vehicles
- Increased uptake of active travel

None of these measures are likely to sufficiently reduce emissions along the A289 to counteract the cumulative impact of the proposed developments. In particular, a large proportion of the new housing is expected to appeal to commuters travelling to London, yet there is no rail station on the Hoo Peninsula and no confirmed funding for sustainable transport infrastructure. Consequently, new residents will almost certainly rely on private vehicles, further increasing traffic volumes on Four Elms Hill and the A289.

Moreover, the Local Plan does not provide clear or robust evidence of how the proposed mitigation measures will be funded or delivered. Without this, such measures cannot be considered credible or effective and therefore cannot be relied upon to address the additional air quality impacts arising from these developments.

4.10.6 The Medway Air Quality Action Plan 2015 was adopted in December 2015, and the Four Elms Air Quality Action Plan in 2022. The Medway Air Quality Planning Guidance, 2021 has been prepared to set out the measures which will be taken to help reduce emissions which occur as a result of development proposals. It provides advice for the design and layout of schemes and potential mitigation measures. The guidance applies across the whole borough to improve air quality and avoid worsening air quality in existing AQMAs or resulting in the designation of further AQMAs.

The Four Elms Air Quality Action Plan (2022) is cited within the draft Local Plan to support projected improvements in air quality and emissions reduction. However, this document is now outdated and relies on mitigation measures that are no longer viable. The assumptions and modelling scenarios within the Action Plan are fundamentally based on infrastructure improvements funded through the Housing Infrastructure Fund (HIF), a project that was quashed by central government in October 2023. As such, the Four Elms AQAP can no longer be considered a reliable or evidence-based foundation for planning policy or for assessing the air quality impacts of proposed development.

The Plan itself explicitly states:

"As part of the implementation of the Local Plan, a large area of residential and employment land has been attributed for development on the Hoo Peninsula, which will lead to additional traffic on Four Elms Hill."

It continues:

"As part of the Housing Infrastructure Fund (HIF), £170 million of funding has been secured to deliver strategic transport and environmental projects on the Hoo Peninsula…"

These statements are now inaccurate, given the HIF funding was removed by central government. Yet, the modelling assumptions in the AQAP are entirely contingent on those upgrades being delivered. The plan even acknowledges that:

"Scenarios were modelled with EFT emissions and background concentrations for 2024 in line with the HIF relief road initially proposed opening year…"

"In 2024 with the Local Plan and the HIF Relief Road implemented, exceedances of the NO_2 annual mean AQO of 40 µg/m^3 are predicted at over half of the modelled receptors… In 2030… two exceedances… are predicted, the highest concentration being 51.9 µg/m^3."

These results are deeply concerning, even under optimistic modelling assumptions. The modelling reveals that air quality levels would continue to exceed legal thresholds for NO_2 even *with* the HIF-funded infrastructure, which is no longer going ahead. Without that mitigation, the actual outcomes are likely to be significantly worse.

Despite this, the Local Plan continues to reference the Four Elms AQAP as a credible evidence base. This calls into question the robustness of the Local Plan's environmental and health impact assessments,

particularly in relation to air quality in areas already designated as Air Quality Management Areas (AQMAs).

The health implications of this are serious. As highlighted in the Medway Air Quality Action Plan (2015):

"NO_2 has been identified as having various adverse health effects, particularly on the respiratory system… It has been estimated that poor air quality in the UK causes more than 50,000 deaths per year… and may reduce life expectancy by 7–8 months."

Furthermore, the draft 2025 Medway Pharmaceutical Needs Assessment (PNA) notes that:

"The Hoo Peninsula asthma prevalence (6.9%) exceeds the local and national average."

The evidence presented demonstrates that the draft Local Plan relies heavily on outdated documents and modelling scenarios, particularly those associated with the now-defunct Housing Infrastructure Fund (HIF). As this infrastructure will not be delivered, the continued reliance on these assumptions undermines the robustness and credibility of the Local Plan's evidence base. This raises serious questions regarding the Plan's soundness under national planning policy.

We therefore strongly urge that Medway Council cease using the Four Elms Air Quality Action Plan 2022 as part of its evidence base, and instead undertake a revised, updated air quality assessment that reflects the current funding context, transport realities, and health vulnerabilities in the area.

Furthermore, monitoring data clearly shows that current pollution levels, particularly for nitrogen dioxide (NO_2), significantly exceed the World Health Organization's recommended limits. Any future large-scale developments on the Hoo Peninsula will inevitably exacerbate air quality issues along the A289 and Four Elms Hill, directly impacting the health and wellbeing of both existing and future residents.

In light of the increasing volume of residential development on the Peninsula, as well as expanding industrial activity (including large-scale operations such as Amazon and Kingsnorth), the Parish Council strongly recommends that tangible, site-specific mitigation measures be implemented, and where necessary, required as planning conditions, prior to further approvals being granted. Examples include:

- Installation of reed beds, which are proven to reduce nitrogen oxides (NOx)—a major pollutant from diesel emissions. A potential location for such intervention is the southern side of Four Elms Hill.
- Planting of native hedgerows and trees along key road corridors to create a natural environmental barrier. These would contribute to carbon capture, reduce particulate matter, and serve as sound barriers to mitigate traffic noise.

While the Local Plan states its intention to promote "healthy communities," the continued allocation of housing in already overburdened and polluted areas fundamentally contradicts this objective.

Crucially, the Local Plan provides no clear evidence or strategy for how the substantial infrastructure improvements required to address air quality and public health concerns will be funded or delivered. Without such a framework, the Plan lacks both credibility and feasibility in its current form

Summary

As described above, Frindsbury Extra Parish Council recognises the importance of Medway Council adopting a comprehensive and effective Local Plan. However, for the reasons previously stated, we do not believe the current version of the Plan is either *sound* or legally compliant.

We are concerned that the Council appears to be progressing the Local Plan primarily to meet housing targets, without adequately planning for or securing the essential funding, infrastructure and supporting measures required to ensure the safe and sustainable delivery of development. This approach risks compromising the well-being of both existing and future residents.

We strongly urge Medway Council to fully consider the views of the Parish Council representing the most localised tier of government and to make the necessary amendments to the Plan. We call on the Council to provide clear, evidence-based assurances that the infrastructure, services, and funding required to support the proposed growth will be delivered in a timely and sustainable manner, in line with Medway's stated ambitions.

Thank you and Kind Regards

Frindsbury Extra Parish Council