

Allhallows Parish Council

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1. Introduction

This objection is submitted on the basis that the proposal conflicts with multiple policies in the National Planning Policy Framework (NPPF) and the emerging Medway Local Plan 2041, as well as established spatial strategy principles. The development represents an unsustainable, disproportionate and unjustified expansion of Allhallows.

2. Conflict with the Development Plan and Spatial Strategy

2.1 Outside the settlement boundary

- NPPF 15, 105, 110, 174 – requires development to be located where it can be sustainably accessed and where it protects rural character.
- Medway Local Plan 2041 (Reg.18) – Allhallows is not identified as a suitable location for strategic growth.
- Spatial Strategy – directs growth to urban centres and strategic allocations, not isolated rural villages.

2.2 Prematurity

- NPPF 48 & 49 – refusal is justified where granting permission would undermine the plan-making process.
- A development of 350 dwellings in a non-allocated rural village would predetermine strategic decisions in the emerging Local Plan.

2.3 Site excluded from Medway Local Plan 2041 allocations

The site was assessed and rejected in the Local Plan evidence base as unsuitable.

NPPF 31 & 35 – decisions must be based on proportionate, up-to-date evidence.

The Council's own evidence identifies:

- poor accessibility/reliance on A228
- limited services
- environmental constraints
- unsustainable transport patterns

Granting permission would contradict the Council's evidence-based spatial strategy.

3. Unacceptable Scale and Overdevelopment

3.1 Disproportionate to Allhallows

- NPPF 130 & 134 – developments must be sympathetic to local character and proportionate in scale.

- A 350-home estate would overwhelm a small rural village.

3.2 Urbanisation of countryside

- NPPF 174(a) – requires protection of valued landscapes and rural character.
- NPPF 180 – requires avoidance of significant landscape harm.
- The proposal introduces a large, urban-form estate into open countryside.

4. Highways, Access and Transport Concerns

4.1 Stoke Road capacity and safety

- NPPF 110(b) – safe and suitable access for all users.
- NPPF 111 – development should be refused where cumulative impacts are severe.
- Stoke Road is narrow, constrained, and unsafe for increased traffic.

4.2 Unsustainable reliance on private cars

- NPPF 105 & 112 – developments must reduce car dependency.
- The location cannot support sustainable travel.

4.3 A228 and Four Elms Roundabout

- NPPF 111 – severe cumulative impacts justify refusal.
- The A228 corridor is already at or over capacity; Four Elms roundabout is a known bottleneck.

4.4 Ratcliffe Highway capacity and safety

- NPPF 110(a) & 111 – requires safe operation of the highway network.
- Ratcliffe Highway has a collision history, and narrow geometry, its current condition is a concern with its ability to support further growth in traffic.

4.5 Limited public transport

- NPPF 112(a–c) – requires high-quality public transport and active travel options.
- Allhallows has infrequent buses, no local rail access, and unsafe walking/cycling routes.

4.6 Haven Holiday Park cumulative impact

- NPPF 111 – cumulative impacts must be assessed.
- Haven Holiday Park generates up to 2,000 vehicle movements/day in the summer peak and a seasonal population of c.10,000 – 1,300 caravans and employees (site owners own estimate with traffic volume also identified in developers own figures).
- The application ignores this known, quantifiable pressure.

4.7 Withdrawal of Stoke–Allhallows school bus (Autumn 2026)

- NPPF 110(b) – safe access for all users, including children.
- Withdrawal of this service will force pupils onto Stoke Road, which lacks footways and lighting.
- Increased car trips from parents further worsens congestion.

4.8 Development dependent on private car usage

- NPPF 105, 110, 112 – developments must prioritise sustainable transport.
- This site cannot meet those requirements due to rural isolation and lack of alternatives.

5. Lack of Local Services and Infrastructure

5.1 GP and primary care capacity

- NPPF 93(a–d) – requires adequate health infrastructure.
- Allhallows has a very limited Doctor’s Surgery, with no GP’s allocated; accessibility of main surgery in Hoo is limited by public transport or encourages more car transport.
- No NHS mitigation or funding is proposed.

5.2 School capacity

- NPPF 95(a–c) – requires sufficient school places and timely delivery.
- No secondary school in Allhallows; primary schools are near capacity, confirmed by the school.
- No agreement with the Local Education Authority or DfE. This will create additional car journeys to alternative schools on A228 and Ratcliffe Highway.

5.3 Water Supply

- We understand that there is no spare capacity in the water supply to the village.

5.4 Electricity Supply

- There were issues with electricity supply to recent developments in the village and additional sub-stations were required.

6. Environmental and Landscape Impacts

6.1 Loss of countryside

- NPPF 174(a) – protect and enhance valued landscapes.
- NPPF 180 – avoid significant landscape harm.

6.2 Biodiversity impacts

- NPPF 179 & 180 – protect habitats and deliver biodiversity net gain.
- Insufficient evidence of net gain or species protection.

6.3 Proximity to protected habitats

- NPPF 180 & 181 – requires protection of SSSIs, SPAs, Ramsar sites.
- Increased recreational pressure and disturbance not mitigated.

7. Flood Risk and Drainage

- NPPF 159–169 – requires robust assessment of flood risk and sustainable drainage.
- Outline application lacks detail; insufficient evidence that SuDS can be delivered.

8. Reserved Matters Provide Insufficient Detail

- NPPF 130 & 134 – requires high-quality design and clear evidence of layout, scale, and landscaping.
- With appearance, layout, scale and landscaping reserved, the application provides no assurance that impacts can be mitigated.

9. Conclusion

This proposal conflicts with multiple sections of the NPPF and the emerging Medway Local Plan 2041, including policies relating to:

- sustainable transport
- spatial strategy
- landscape protection
- infrastructure capacity
- design quality
- cumulative traffic impacts
- health and education provision

The site has been explicitly excluded from the Local Plan 2041 allocations, and the proposal would result in severe cumulative impacts on the highway network, unsustainable car dependency, and unacceptable pressure on local services.

For these reasons, the application should be refused.