



**Medway Council**  
**Planning Department**  
Gun Wharf  
Dock Road  
Chatham  
Kent, ME4 4TR

**18 October 2021**

**Dear Sir**

**Application: MC/21/2328: Land South of Bush Road, Near Cuxton, Medway, Kent**

**Construction of a winery building including café/restaurant and visitor centre with energy centre, car park, access road and landscaping.**

The revised plans do nothing to reassure Cuxton Parish Council that this planning application should be approved. It is our view that this application should have been dismissed at the pre-planning stage as was the case with Gravesham Council when we believe the location for this development was Luddesdown. The primary reason for our decision remains unchanged: Bush Valley lies in an Area of Outstanding Natural Beauty, within the Metropolitan Green Belt and adjacent to a Conservation Area (Upper Bush) and so should be protected from being destroyed to make way for a huge commercial development such as the proposed Kentish Wine Vault that includes a huge subterranean processing plant.

Medway Council's own Greenbelt Review 2018 states that the extent of Green Belt land in Medway "is relatively small, 4.94% of land area' (page 4), and even less is also categorised as an AONB. Despite the small size the Green Belt and AONBs in Medway these areas do offer residents access to tranquil open spaces in an otherwise increasingly urban area.

Green Belt land is covered by the National Planning Policy Framework, which attaches great importance to Green Belts and lists 5 purposes. Purposes 3- 5 are the most relevant here:

- Purpose 3: to assist in safeguarding the countryside from encroachment

Medway Council's Local Plan Sustainability Appraisal (2018) acknowledges that Medway has less landscape, heritage and open spaces per 1000 residents than neighbouring authorities and concludes that Medway's countryside and open space is under threat from new development. For these two reasons alone approving a huge commercial development in an AONB would seem to go against Medway's own developing Local Plan Sustainability Appraisal.

- Purpose 4: to preserve the setting and special character of historic town

Whilst Medway Council's Green Belt Review does not consider that Cuxton has an 'historic core', it has been recognised as a settlement for 200,000 years. Cuxton is also the home to a Palaeolithic site of national importance (scheduled monument number :1003363).

The KCC Archaeology team have identified the presence of archaeological remains in Bush Valley comprising a probable funerary monument of Late Neolithic or Early Bronze Age date that was subsequently enlarged in the Early Bronze Age.

- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land\*

When considering planning within a Green Belt area the NPPF places a responsibility on planners to consider whether the circumstances are exceptional and justified to include an initial assessment of making 'better use of suitable brownfield sites and increasing density in appropriate locations well served by public transport'.

Planning on the doorstep (PAS2015) states that '... *it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land.*

After recently investing 8 million pounds into creating vacant, dedicated business estates, including the Innovation Centre and North Kent Enterprise Zone, designed to encourage 'the right' type employers / employment in Medway, and offering plenty of jobs per square metre. It would be contrary to these aims to sanction such large and commercial operations on Green Belt / AONB land to create an estimated 50 service /agricultural jobs.

If the overarching new plan for Medway 2035 regeneration is to create a Waterfront City conurbation by invigorating riverside housing, paths and employment it is reasonable to ask why the operations proposed by the KWV cannot be conducted locally in an area that doesn't destroy an AONB and would benefit from excellent river transport links.

Indeed, of the 11 sites in Cuxton, identified for development in Medway Council's SLA, the only one approved was the 1367 site at Cuxton Industrial Estate (riverside land approved for B1, B2 and B8 classifications).

It is concerning to read that those officers involved in the pre-planning application meetings appear to have decided to discount the protection the designation as an AONB affords.

*"Officer comments are complimentary about the combined architectural and landscape design and in spite the high status of protection an AONB affords, find the scheme compelling enough to support the application."*

*(Source: Landscape Responses document, page 1, Landscape Architecture, para 1).*

AONBs are landscapes that have distinctive character and outstanding natural beauty. Safeguarding these areas is in the national interest. Any major development in an AONB must meet the criteria for exceptional circumstances and be in the public interest.

The representation from the Kent Downs AONB Unit officer provides a comprehensive evaluation of the legal and policy evidence to support opposition to this development. Cuxton Parish Council agree with their appraisal that this is not an agricultural development, but a *"mixed use development comprising several different elements including agriculture, industrial, visitor centre, retail and restaurant, with the agriculture an ancillary part"* (page 2). As such this development should not be considered an exceptional circumstance.

To be considered in the public interest any development inside an AONB must also demonstrate that the benefits outweigh any harmful impact. The benefits of potentially 50 employment opportunities and apprenticeships fall far short of compensating for the loss of a tranquil valley with AONB status. This is a potential national loss not just a local one.

The representation of the AONB Unit officer also raises the point that no consideration appears to have been given by the applicant to locating the facility outside of the AONB and challenges the applicant's assertion that transporting the grapes off site would damage the grapes and the quality of the wine produced (page 4). Additionally, the AONB representation goes on to suggest that a proposed building of this scale would have an irreversibly impact on the special character and qualities of the Kent Downs, and that the LVIA "*significantly underplays some of both the landscape and visual impacts*" (page 4).

After due consideration, of the evidence Cuxton Parish Council strongly oppose this development in the proposed location within the Kent Downs AONB and urge the developers to look for an alternative location that is not in the AONB and has better road links as discussed under 'Purpose 5', thereby removing the prospect of increased traffic flow through Cuxton village which is the other major concern of residents.

This concern is clearly evidenced in Cuxton Parish Council's original response to the planning application. It is difficult to believe that the estimated 70,000+ visitors a year to the Visitor Centre, in addition to the restaurant and café customers, will have a "limited impact" on Bush Road traffic flow, as suggested by the traffic assessments presented in the planning application. The volume of HGV deliveries to the bottling plant are also a real concern given the ambition of the applicant is to produce 10-15 million bottles of wine a year, all of which will need to be transported in and out of the processing plant along Bush Road.

Taking a wider view, this month's COP26 conference has highlighted the urgency of the need to place our planet and our children's future ahead of continued industrial development and urges us to protect our communities and natural habitats. The AONB status of Bush Valley should protect it from devastation and as a nation we have committed to protect biodiversity and the natural environment, not to destroy it.

On November 9<sup>th</sup>, Medway Council held their first ever Climate Change Conversation Event, promoted as an opportunity to share ideas and talk through climate change in Medway. We must assume from this that Medway is serious about its own responsibility towards reducing climate change, and so will reject this proposal that will decimate some of the last remaining chalk grasslands in the country.

Plantlife, in charge of our green-flag country park at Ranscombe, have recently featured in a very informative, global news article from the UK Centre of Ecology and Hydrology. The article explains how grasslands can absorb as much CO<sub>2</sub> as a forest of the same size and that their preservation is essential for slowing climate change.

It is a fact that the climate is already changing, and it will continue to change even as we reduce emissions, with potentially devastating effects. We cannot afford to wait to act against the threat of climate change. We must work together **NOW** to protect our planet and people and ensure a greener, more resilient future for us all.

*"Making peace with nature is the defining task of the 21st century. It must be the top, top priority for everyone, everywhere."*

António Guterres (UN Secretary General)

The question is this: is Medway Council willing to stand up for the planet, take positive action and prove that they are serious when it comes to protecting our environment? Reject this commercial development masquerading as a green one, because it will destroy Bush Valley and destroy a beautiful, biodiverse and tranquil part of the Kent Downs Area of Outstanding Natural Beauty for ever. Better to **“Respect, Protect, Enjoy”** (Kent Downs AONB Unit)

Yours faithfully

June Nicholson

Clerk/RFO

Cuxton Parish Council