HEARING STATEMENT
MATTER 13: SITE ALLOCATIONS

HALLAM LAND (ID: E157, E.20)

Policy SA8 – Inspectors' questions 13.92 to 13.106

1.1 Hallam Land's representations (E157) set out specific concerns regarding the suitability and deliverability of sites at Hoo St Werburgh and Chattenden on the basis of the Plan's current polices. These concerns include uncosted infrastructure requirements, aspirational transport schemes (including BRT and rail upgrades) and a lack of coordination between sites.

1.2 The Council's own evidence demonstrates that the Hoo Peninsula is not an intrinsically sustainable location for growth (A3.1, Figure N.5.2 "... the Hoo Peninsula SDO emerged as the worst performing"), meaning that extensive mitigation is necessary to overcome those constraints (as is evident from the extensive requirements set out in Policy SA8). Ten individual sites are listed under Policy SA8, demonstrating a need for coordination and collaboration.

1.3 Whilst the coordination of design, programming and delivery of environmental and transport infrastructure could be achieved, the trajectory for doing so is optimistic, and the mechanisms to ensure that the appropriate infrastructure is delivered in a coordinated and timely way are not yet resolved.

1.4 For that reason, a more realistic trajectory is required, and contingency is required in the form of deliverable sites which are not otherwise constrained by infrastructure or a need for complex coordination between multiple interests and agencies.

General Questions for Policies SA13 - SA14 – questions 13.210 to 13.213

1.5 Our representations express concerns about the detail which underpins Policy SA13, including the extent to which alternative locations for employment uses will allow redevelopment of the Frindsbury Peninsula in a coordinated and timely way.

1.6 As with other key strategic sites, the identification, costing and coordination of infrastructure currently provides insufficient certainty that the Council's housing delivery trajectory can be met.

1.7 Whilst these deficiencies could be overcome, the Plan provides no contingency against its reliance on these sites within the plan period. Given the compound constraints which exist – a need both for relocation of existing employment uses and the delivery of new infrastructure to serve new development – greater flexibility is required than currently expressed in policy, with contingency measures including the identification of alternative sustainable development sites capable of early and unconstrained delivery.