

Hoo Development Framework consultation 2022

Response from CPRE Kent

Overarching comments

CPRE Kent encourage the effective community engagement which must go alongside good placemaking. We do however believe the level of detail we and the public are being asked to comment upon ahead of being asked if there should be such significant focus of development on the Hoo Peninsula in the first place is causing confusion. That is, it would be entirely understandable for someone reading the current consultation materials to presume that the principle of the development has already been accepted. As it is, we have had people asking us what the point of commenting on this consultation is as Medway Council will just do what it wants anyway.

Within the introduction to the consultation document, it is stated that comments gathered during the consultation will inform the ongoing work on the new local plan and will be considered in the next stage of formal consultation on the local plan. The recently published Local Development Scheme (LDS) confirms the intention is to undertake a Regulation 18 “Development of Alternatives” consultation next year, with overall adoption of the new plan not occurring until the end of 2025. Whilst we welcome the degree of clarity the new LDS brings with respect to timings, the current issues within Medway Council being unable to progress a Local Plan are well documented.

Against this backdrop, we do remain extremely concerned that Medway is pre-determining its housing growth strategy outside of the considered assessment of the Local Plan process and have been raising this concern throughout the various HIF consultations. To us, it remains that the Council is purposely pushing forward on the detail of the individual elements of the proposed Hoo St. Werburgh Development in a piecemeal fashion with the intention of then presenting the housing upon on the Hoo Peninsula as something which has already been decided and cannot be changed within the emerging Local Plan.

This concerns us as it is the Local Plan process alone which allows for the correct, democratic, and balanced consideration of appropriate growth strategies along with reasonable alternatives. In usual circumstances, CPRE Kent would be considering the detail of what is being proposed alongside the necessary context of the Local Plan and its accompanying evidence base. This would include full environmental assessments, sustainability assessments, transport assessments and other assessments as necessary, such as air quality assessments.

On environmental matters alone, the Hoo Peninsula is a largely rural area, containing significant environmental constraints including ancient woodlands, SSSI's, SAC's SPA's and RAMSAR sites. It is also predominately Best and Most Versatile agricultural land and has significant areas of intrinsically dark skies, the loss of which should be strongly resisted. The ecology upon the Hoo Peninsula is extremely sensitive, containing one of the largest breeding site in the UK for the nightingale population, highly protected water voles along with recently proven habitats of the rare purple emperor butterfly and a rare breed of dormouse. Medway also has at least six red listed rare birds sheltering in its boundaries including the Black Tailed Godwit, the Curlew and the Pochard and many more on the amber list. It is also the fact that the Four Elms Hill and Peninsula Way through

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Chattenden suffers significant levels of air pollution, hence it being designated a Air Quality Management Area (AQMA).

Without the wider evidence base and context that would accompany a local plan, it remains our view that it's not possible to provide fully informed comments on the detail of what is being proposed. In isolation of this, we currently remain utterly unconvinced that the selection of the Hoo Peninsula for such substantial housing development would survive the Local Plan process. Our concern is that Medway Council is also fully aware of this and will therefore continue to actively avoid the scrutiny of a Local Plan process up until the point the Hoo Development can be presented as a done deal. CPRE Kent strongly object to such an approach and will continue to raise these concerns throughout this consultation, the wider Local Plan consultation and certainly any plans with come forward outside of the Local Plan Process. In particular, we will be scrutinising the approach the Local Plan Sustainability Appraisal takes.

In view of the above, we maintain our overriding objection to the principle of the Hoo St. Werburgh Development and no comments/engagement with this consultation should be construed as support for the proposal. Notwithstanding this point, we would far rather be sitting at the table trying to provide positive contributions to any future development than just shouting from the sides. That is, should the intention be for a draft SPD for the Hoo development or similar to be prepared alongside the local plan process to inform the proposed policy text for the allocation, we would welcome being part of that process.

Detailed comments

Against the above context, we make the following observations:

- Little detail or context is given with respect to the Hoo Peninsula Landscape Sensitivity and Capacity Study referred to. Whilst it is assumed this is the report previously provided as a draft intended for internal use only circa 2019, this is not clear and nor is it clear whether this was subsequently updated. Without such detail, it is impossible to understand the full logic behind each of the sensitivity conclusion or whether or not we could agree.
- Notwithstanding the above comment, we are extremely surprised to see Land east of Hoo St Werburgh assessed as having a low/medium sensitivity to development given the existing topology and very little existing enclosure.
- We note car ownership and usage rates on the Peninsula are much higher than the rest of Medway. As set out in our responses to the various HIF consultations, CPRE Kent strongly object to the principle of the Government spending £86 million pound to build traffic inducing new roads that facilitate building, or “unlocking”, greenfield sites. It is our view such government funding should be being redirected towards the regeneration and delivery of new homes on brownfield sites within the Medway towns. The benefits of new roads schemes are extremely over-stated and in reality, generate traffic above background trends by inducing traffic, which leads to permanent and significant environmental damage. Specifically, and as set out in our The end of the road? Challenging the road building consensus, March 2017 <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>, the building of new roads to accommodate further

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growth is just going to significantly exacerbate the Peninsula's accepted existing problem with ingrained car dependency.

- Whilst we note the "Garden Communities aspirations", unfortunately this is now being used as little more than marketing guff across Kent and the rest of the country with what is being built/proposed now showing very little resemblance to the true original principles of the Garden City movement. Regrettably there is nothing within this consultation document that convinces CPRE Kent the Hoo Peninsula proposals would be any different.
- Specifically, there seems to be very little real reference or aspiration to fundamental Garden City principle of self-containment through the provision of providing at least 1 job per household. Rather, the proposal seems to be the creation of a dormitory town primarily dependant on new road building to enable in/out commuting to resident's places of work along with reliance upon the existing employment area at Kingsnorth. The lack of information with respect to self-containment, combined with the lack of vision or detail with respect to proposed on site employment provisions, currently seems to be a significant failing of the current proposal.
- With respect to the proposed "neighbourhoods" generally, we have particular concern with those north of A228 (Chattenden, Deangate and High Halstow). In basic place making terms, we would have expected that the A228 would have acted as an obvious edge of the proposed development, not least as any real permeability beyond this obvious barrier will naturally be extremally limited. Rather, the temptation for future occupiers will remain to use the car to make those short journeys to the local centre. This is because they would be looking to either avoid dangerous crossings or having to take significant detours so as to use preferred routes that are intended to provide connectivity. High Halstow comes in for particular criticism in this regard as clearly is isolated from the rest of the proposed development and offers no real connectivity.
- It is also the case that both Chattenden and Deangate are located within the most environmentally sensitive areas, abutting the Chattenden Woods and Lodge Hill SSSI. It seems a lost opportunity to not use the barrier that would otherwise be offered by A228 to minimise the likely significant impact this development will have on this particularly environmentally sensitive area. Likewise, the topography with respect to the Deansgate area means any landscape impact will be most acute here.
- Whilst we note throughout the document reference is made to the fact the highest regard has been had for the SSSI, Ramsar and SPA designations, the selection of the Hoo Peninsula for such extensive development in the first place is a direct contradiction of this statement. If the highest regard was truly to be being had then you would not choosing to development right up to the boundary of these important designations.
- For these reasons, as a minimum we consider those neighbourhoods north of A228 (Chattenden, Deangate and High Halstow) need to be removed from the proposal going forward.

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