



Historic England

Hoo Development Framework Consultation  
Planning Policy  
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Date 24 November 2022

[By email only to planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

Dear Sir or Madam

### Hoo Development Framework Consultation

Thank you for your email of 29 September 2022 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 9 April 2020), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment; and contain policies to deliver the conservation and enhancement of the historic environment. These considerations remain relevant.

Our comments at the first stage of consultation (ref. our letter of 9 April 2020) are somewhat better reflected in the current version of the framework in that many of the historic environment characteristics of the study area are identified and acknowledged. In our view, however, there is still an underplaying of the significance of the full range of the heritage of the area and the part it could play in enhancing the new and existing communities in this part of the Hoo Peninsula. This is possibly a reflection of an inadequate understanding and appreciation of the evidence base that, we previously pointed out, is likely to result in an "undercooked" plan for the development of the area in historic environment terms.



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Correspondence or information which you send us may therefore become publicly available.





The Hoo Peninsula, including Hoo St Werburgh and its surrounding villages and landscapes, holds an extraordinary depth and breadth of heritage potential. An outline of some of this was set out in our letter of 9 April 2020. We believe that more still needs to be done to fully understand the heritage baseline in order to better inform the emerging proposals for the area. This requires a robust heritage assessment so that development options are understood in the context of, and tested for impact against, the historic environment and heritage assets early in the planning programme and prior to the establishment of firm development proposals. This would prevent potential conflict and delay later in the planning process.

In summary, while there is better acknowledgement of some of the historic assets of the area than in earlier versions of the framework, there is still only a limited consideration of the significances of the heritage resource of the study area. It is essential that the conceptual framework is based on an appropriate understanding of the historic environment, and that this knowledge supports the potential for the historic environment to contribute to the future successful sustainability of the new communities, and informs the emerging structure and form of the new built environment so that it is sympathetic to its context.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We hope that these comments are useful. Please do not hesitate to contact me to discuss any of the matters raised in this letter.

*Yours sincerely*

***Alan Byrne***

**Historic Environment Planning Adviser**

CC Alice Brockway, Historic England  
Ben Found, Kent County Council  
Ross Crayford, Medway Council

