

24th November 2022

Catherine Smith
Medway Council
Planning Policy
Gun Wharf
Dock Road
Chatham
ME4 4TR



Innovation House
Discovery Park
Sandwich
Kent, CT13 9ND

T 01304 806850
E info@humeplanning.co.uk
W www.humeplanning.co.uk

Dear Catherine,

Hoo Development Framework Consultation

We are writing on behalf of our client, FD Attwood and Partners who control a significant land interest within the Hempstead Corridor, in relation to the Hoo Development Framework Consultation. From the circulated information, it is evident that this document is being prepared as a basis for the future consideration of a new settlement at Hoo, with the intention of the Development Framework providing more certainty on what additional services would be delivered as part of strategic growth on the Hoo Peninsula.

Because of the significant scale of development proposals envisaged in this document for the single location of Hoo, this option, if pursued, must be presumed to underpin the whole of the emerging Local Plan strategy. Therefore, whilst the aim of this consultation is predicated on the basis of ensuring that growth in this location can be delivered in the form of a sustainable new community as envisaged, its preparation and consultation at this point is considered to be premature and "out of step" with the Medway Local Plan Review.

Whilst the proposed new settlement at Hoo was included in the previous Local Plan strategy, the Regulation 19 draft Plan was formally abandoned by the Council in October 2021. It has subsequently been agreed by the Council, following discussions with DLHUC, that it will revisit the spatial strategy and development options and will be informed by a new "Call for Sites" assessment which commenced earlier this week on the 20th November 2022 and will run beyond this (Hoo) Consultation until the 31st January 2023.

Accordingly, at this time, the Council's evidence gathering should be looking at the spatial strategy in broad terms, focusing on options for the distribution of growth. This is expected to be set out in the Regulation 18 Consultation some time in 2023 when the "Call for Sites" options have been assessed. This (Reg 18) Consultation will then seek to gather stakeholders' views on the most appropriate strategy to meet Medway's housing needs over the Plan period.

It is self-evident that the timing of the Hoo Consultation, apart from being confusing to members of the public, suggests that a full and rigorous review of all available spatial options will not be pursued and the continued focus at Hoo, which has been evident since the first attempted review of the 2003 adopted Medway Local Plan in 2005, will continue to be pursued.

This approach suggests that the spatial strategy is predetermined, and that growth will be focused at Hoo. The implications of this are likely to lead to unbalanced comments being received at the Regulation 18

Consultation stage from the public and an incomplete assessment of alternative strategies at this early stage of the plan making process by officers. The foundations of sound plan making will be undermined at the outset, putting the whole process at risk of challenge and failure.

Further advancing this Framework ahead of an agreed Spatial Strategy could result in abortive work, additional resourcing costs and most importantly, further slippage to the review process which Medway Council can ill afford if the plan is to have a future role in guiding development pressure.

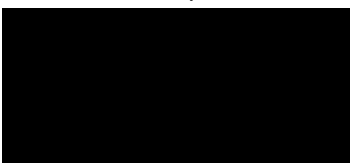
The level of growth at Hoo cannot be known until the spatial strategy is fully considered, and planning for a settlement of 10,000 would look very different in terms of requirements to a settlement of 5,000. It is also considered that further work is required to understand the likelihood of HIF funding being available in the longer term for the necessary infrastructure works. Hoo remains predicated on a £170 million HIF bid to make it a "sustainable location"; a pivotal funding assumption that has been in place for some time and is likely to be vulnerable to competing public funding projects, given the current economic conditions. This is more critical in the case of Hoo because assumptions are being made on the delivery of large items of infrastructure at Hoo, including a new railway station and passenger railway line as part of the Hoo consultation.

The HIF funding approvals were secured at a time when Medway Council decision makers believed that the emerging local plan could be adopted with Hoo as the spatial "centrepiece" of the strategy and an evidence base that suggested there were no suitable alternative spatial options that would be acceptable, which was contested by many objectors. It is no longer possible to make this conclusion as Medway Council are today at the very start of the review process and purportedly will be open to the consideration of a full range of options from landowners across Medway, not all of which have been previously even handedly reviewed. It has been accepted by all parties that without HIF funding for major road and rail and environmental infrastructure that Hoo is not a sustainable location and would not support the growth in this area as envisaged by the Framework.

It is therefore considered that the progression of this document should be paused until after the representations received at Regulation 18 stage of the Local Plan have been fully considered, and a preferred spatial strategy to accommodate the growth determined. The Framework will then have a clear brief and can look to provide a vision for the Local Plan in line with paragraph 22 of the NPPF.

The Council will note from previous correspondence that FD Attwood and Partners has concerns regarding the provision of a new settlement at Hoo. We do not seek to set out these comments here, given the focus is on the Framework itself rather than the principle of growth in this location, but we will be providing comments on this at the Regulation 18 consultation draft and in broad terms we request this objection is noted.

Yours sincerely,



A J Hume
Principal
Hume Planning Consultancy Ltd