

Planning Policy
Medway District Council
Gun Wharf, Dock Road
Chatham
Kent
ME4 4TR

By email only to: planning.policy@medway.co.uk

25 November 2022

Dear Sir/Madam,

Re: Hoo Development Framework Consultation

Gladman Developments Limited ('Gladman') is a leading strategic land promoter with considerable experience of the development management and plan making process. With significant land interests on the Hoo Peninsula, Gladman welcomes the opportunity to comment on the draft Hoo Development Framework ('the Framework').

Gladman fully supports Medway Council's ('the Council') identification of a new settlement on the Hoo Peninsula and the important role this will play in Medway's future growth strategy. This support, however, is qualified in some areas where Gladman consider that further clarification would bolster the Hoo Development Framework.

The role of the Hoo Development Framework

Within the introductory section of the document, the Council identifies that the Framework does not itself constitute planning policy but rather provides direction on the vision and key principles for a new settlement on the Hoo Peninsula. The Framework is, moreover, noted as forming part of the evidence base to develop policy requirements for related housing allocations.

Gladman consider that, notwithstanding the development status of the Framework (or lack thereof), there would be benefit in clarifying the role of the Framework in decision making in the interim between preparation and adoption of the new Local Plan. On this matter, the reference to the non-statutory nature of the Framework needs to be qualified. Although it is not a statutory document it could be treated as a material consideration in the determination of planning applications.

In qualifying the Framework's role in decision making, regard should be had to the fact that the Framework should not introduce additional requirements above those established in the adopted Development Plan, and that the objectives and principles therein must be viewed as illustrative and not absolute requirements. The Framework must retain enough discretion to allow flexibility in the final design and layout of individual development sites, which will be determined during the development management process and in response to site specific opportunities and constraints.

The Framework Plan

Section 4 of the consultation document provides an illustrative Framework Plan for the new settlement on the Hoo Peninsula, which combines the Council's vision for Hoo St Werburgh, aspirations and key development principles. Gladman acknowledges the Council's reference to the illustrative function of the Framework Plan but considers there to be a need for further clarification on its illustrative nature and its iterative and incremental development. At this stage the Framework Plan is not fixed, but subject to change and refinement. This needs to be recognised by the Council in future versions of the Framework.

The current Framework Plan is rightly aspirational and communicates where development is likely to go and what the Council hopes to achieve in the long term. The Framework Plan, and the principles that underpin it, should not be held as being a prescriptive map for the future development of a new settlement. Rather, the Framework Plan should be conveyed as being flexible, and outcome focused, allowing for the variety of circumstances engendered by the constraints and opportunities of bringing sites (individually and collectively) forward for development. The design and layout of individual development sites will be established through the development management process.

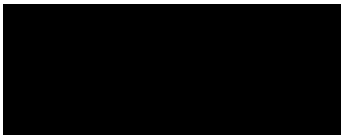
Gladman would also invite the Council to revisit the illustrative Framework Plan, as illustrated on page 73 of the document, to ensure that it accurately captures and reflects the vision and guiding principles. And that these guiding principles are in themselves properly justified and their implications for future development considered.

Conclusions

Gladman supports and welcomes the opportunity to comment on the draft Hoo Development Framework. Through this consultation response, Gladman has sought to identify areas where further clarification and exploration with stakeholders is required. It is hoped that this representation is helpful and constructive. Gladman would like to be informed of and participate in any future consultation on the Framework.

If you have any questions do not hesitate to contact me or a member of the Gladman team.

Yours faithfully,



Chris Ball
Senior Planning Director
Gladman Developments Ltd