

Dear Medway Council,

Thank you for the opportunity to respond to the HDF consultation. We are mindful that this consultation was intended for the residents of Hoo High Halstow and Chattenden but was presented to residents of Chatham Rainham and Capstone and not to the wider Hoo Peninsula.

High Halstow Parish Council does not support The Vision, Key Principles, Overall Framework Plan or Neighbourhoods. detailed in the Hoo Development Framework (HDF) document.

On the 24th of October this Parish Council wrote to the Director of Place and Deputy Chief Executive with concerns over the Hoo Development Framework Consultation. Despite being promised a full reply we have to date received no response. We therefore submit the contents of that letter dated 24th October 2022 (attached), Sample comment received from residents (attached) and further comment (below) as our response to the current Hoo Development Framework Consultation.

"The Hoo Peninsula is a unique location in Medway and hosts the most sensitive environmentally designated countryside, including marshland, RAMSAR sites, ancient woodland, SPA's and SSSI designated land across the whole of Medway, containing, among others, the largest breeding site in the UK for the under pressure nightingale population, highly protected water voles, recently proven habitats of the rare purple emperor butterfly and a rare breed of dormouse. Medway 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.

The current strategy report for Birdwise, quoted the Footprint Ecology Bird Disturbance Report key findings were:

The number of birds using the three SPAs has declined markedly, in particular, on the Medway at locations with the highest levels of access for the public; stating "Access levels are linked to local housing. It is not possible to rule out likely significant effects on the integrity of the protected sites as a result of increased housing;"

The Hoo Peninsula also has a large and growing business community providing local jobs. The Grain LNG terminal is the largest in Europe and eighth largest in the world, with plans for further expansion. The Hoo Peninsula provides proportionately the largest bulk of the business rates income for Medway Council, without which Medway would, as a whole, struggle financially. The wider Hoo Peninsula, including Grain, Allhallows and Cliffe ought to be part of the strategic planning of the Peninsula. Much of the post war late 20th century housing in Hoo and High Halstow was to provide for workers on the Peninsula at the oil refinery, power stations and ports. The Plan needs to consider how employment uses will relate to the housing and transport proposals for the Peninsula.

On top of this, the Hoo Peninsula is proposed to take the biggest proportion of the housing allocation for the whole of Medway. This will more than double the population of Hoo and High Halstow. Hoo would grow into a town the size equivalent to the Ebbsfleet complex with a road and rail infrastructure not fit for purpose. Furthermore, proposals for the Chattenden area are to increase the housing density and numbers on either side of the A228 which has already dangerous air quality issues, well below current recommended safe levels.

There are therefore very important and as yet unanswered questions about how the current planned relief road infrastructure, proposed by HIF, which relies on a 10% modal shift to rail transportation will be sufficient to cope with the simultaneous huge expansion of housing and

business requirements, and also how the unique wildlife ecosystems can thrive in the midst of this growth.

In October 2021 the scheduled Regulation 19 consultation draft Local Plan was published and almost immediately withdrawn. The reason given for the withdrawal was the lack of an evidence base. The Parish Council along with neighbouring Hoo Parish Council and others have repeatedly asked for the evidence base. Particularly the Transport Assessment, and Ecological Impact Assessment that must underpin the Council's proposals for the Peninsula since 2017. Requests for information have exhaustive via written and Freedom of Information requests as well as considering and threatening judicial review. Medway Council has repeatedly promised the evidence base by the end of November 2021 but it has still not appeared, more than 12 months later.

The NPPF makes it clear the approach to preparing plans should be supported by evidence. Under the heading "Preparing and reviewing plans" the Framework provides:

*"31. The preparation and review of all policies should be **underpinned by relevant and up-to-date evidence**. This should be **adequate and proportionate, focused tightly on supporting and justifying the policies concerned**, and take into account relevant market signals.*

*32. Local plans and **spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements**. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."*

Instead of this evidence based strategy, as we ponder this current HDF consultation in which we are pre-emptively asked if residents support **The Vision, key principles, Overall Framework Plan and Neighbourhoods** with no substantive evidence of sustainability.

It is difficult not to conclude that the identification of sites has been led by housing developers rather than the local or the wider Medway community. The Council has issued a new Call for Sites and will be carrying out a Regulation 18 consultation, possibly in Summer/early Autumn of 2023 on "Alternative Development Options". This new consultation suggests that a range of development options and locations will be fairly assessed, including promoted sites in Capstone Valley and around Rainham. We have little confidence that Medway will carry out an evidenced based assessment of any of the options but will once again take the biased political approach that the Hoo Peninsula, this most environmentally sensitive part of Medway a strategic energy hub of national importance and a home to some of our rarest and most precious species, is in danger of unsustainable growth of sprawling housing development.

Yours Sincerely



George Crozer
On behalf of
High Halstow Parish Council